Guildford borough Submission
Local Plan: strategy and sites

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

December 2017

Document 3 of 12

Sections covered
Policy P2: Green Belt
Policy P3: Countryside
Policy P4: Flooding, Flood Risk and groundwater protection zones
Policy P5: Thames Basin Heaths Special Protection Area
Contents

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2. Policy P3: Countryside 1784
4. Policy P5: Thames Basin Heaths Special Protection Area 2242
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

Document part: Policy P2 - Green Belt
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/1197</th>
<th>Respondent: 8553761 / A Howlett</th>
<th>Agent:</th>
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<tr>
<td>I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity.</td>
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<td>I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.</td>
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<tr>
<td>Please register my objection to the Local Plan, we need to consider our children future. We cannot go on building forever over our green belt. Who will stand up and say enough is enough. Surrey Hills is a unique area, lets keep it that way.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<tr>
<th>Comment ID: pslp171/1184</th>
<th>Respondent: 8554113 / Anthony Baker</th>
<th>Agent:</th>
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<td><strong>Document:</strong></td>
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<td>1. <strong>Green Belt</strong></td>
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<td>I strongly object to no changes being proposed since the 2016 consultation with regards to insetting of East and West Horsley from the Green Belt.</td>
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<td>This is completely unacceptable and is against stated Government policy. No credible attempt has been made to demonstrate the exceptional circumstances which are required to allow the plan massive scale of development on Green Belt land around the Horsleys.</td>
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<td>It makes better sense for large scale development to be allowed on brownfield sites in urban areas where there is established and sustainable transport. It is of note that planning permission for a 438-home mixed-use scheme at Guildford train station was recently refused, saying it would appear as a 'monolithic' and 'alien' feature in Guildford town centre. Why does Guildford Borough Council (GBC) consider the station plan unacceptable but would prefer the destruction of large swathes of greenbelt land?</td>
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<tr>
<td>At least 70% of the proposed housing is planned for land currently in the Green Belt. Housing need is not a reason in law for protected green belt land being used. It is perverse for so much housing to be planned for the green belt. Clearly, the green belt has not been used as a constraint as clearly set out in Government advice, planning policy guidance, the NPPF, case law, election manifestos and Ministerial letters to MPs.</td>
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<tr>
<td>Green Belt is precious and was established to confine development to designated areas and this concept is increasingly important in the south east of England. It is what protects London from urban sprawl; it preserves air quality and this is especially important for the villages of East and West Horsley which are also very close to the A3 and M25.</td>
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| The Green Belt serves five legal purposes:  
  * To check the unrestricted sprawl of large built up areas  

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2
• To prevent neighbouring towns merging into one another
• To assist in safeguarding the countryside from encroachment
• To preserve the setting and special character of historic towns
• To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

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

Attached documents:

Comment ID: PSLPP16/2805  Respondent: 8555041 / Adrian Platt  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

I strongly object to the plan to inset several rural villages from the Green The GBC seem to have completely forgotten that people who live in the rural villages in the Borough have chosen a particular lifestyle to live in a rural community and the latest local plan would ruin many people's lives. The policy is grossly unfair to these people and the local plan should be completely altered so that development only occurs in brown field sites and on the urban edges of main towns. In addition the protection granted to residents for future development would be undermined giving villagers limited ways in which they could prevent unacceptable development.

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

Attached documents:

Comment ID: PSLPP16/12688  Respondent: 8555073 / Adrian Bathurst  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

The Council’s decision to remove villages from the Green Belt and alter boundaries is disappointing. The “exceptional circumstances” required to justify this action are stated to exist but are not explained.

In the case of East Horsley and West Horsley (North) the Green Belt and Countryside Study, which has also influenced the decision to inset, states “areas of open land within the wider Green Belt area are not frequently visible within the perceived village area due to the locations of surrounding woodlands and tree cover within private gardens”. There are protected woodlands and protection orders on trees in private gardens and photographic evidence shows how the villages exhibited a much more open character in the past but residents have been encouraged to allow hedgerows to thrive and have created their own tree planting schemes; unfortunately when we thought that this would preserve our rural villages we now find it will cause us to lose our Green Belt status.

The planning department has ensured that developments have been appropriate and without the Green Belt protection it will be very difficult to argue against plans which would have been deemed unsuitable in the past.

Please register my objection.

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

Attached documents:

Comment ID: PSLPP16/5648  Respondent: 8555297 / Mrs G M Aish  Agent:
The policy on which the Conservative party councillors and Government were elected was to protect the Green Belt. Surely to ignore this pledge would be undemocratic and dishonest. The whole point of the Green Belt is to preserve open land and to prevent the sprawl of the metropolitan area. Your Council tax payers certainly did not give you a mandate to remove so many of the villages in Surrey from the Green Belt, with the detrimental effect on the Borough of Guildford FOREVER. I object to the re-designation of Green Belt Boundaries.

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

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

Policy P2: Green Belt
4.3.13 , 4.3.15 and 4.3.16

Object: See comments on Questions 1 to 3,

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

Attached documents:

Comment ID: pslp171/2589  Respondent: 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey)  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

See comments on evidence.

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

Attached documents:

Comment ID: PSLPP16/16471  Respondent: 8557761 / Nigel Farley  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Re: Representation in respect of Draft local Plan - Strategies and Sites Consultation relating to development proposed in West Horsley and former Wisley Airfield site

I wish to object to the proposed draft Local Plan on the following grounds:-

Policy P2: Green Belt and the Countryside / Policy Pl: Surrey Hills Area of Outstanding Natural Beauty (AONB)

1. The first line of Policy P2 states, "We will continue to protect the Metropolitan Green Belt against inappropriate"
2. The residents of West Horsley are totally opposed to the village's removal from the Green Belt by insetting.
3. The Green Belt & Countryside Study is flawed.
4. West Horsley Parish is one of a rich and varied mix of well-established low housing density settlements with a considerable number of historic buildings.
5. Positioned on the north side of the North Downs, partly in the Surrey Hills AONB, it attracts a considerable number of recreational visitors (walkers and cyclists) through the seasons each year.
6. The Key Evidence document "Guildford Borough Economic Strategy 2013-2031” made no case for locating large numbers of homes in West and East Horsley or neighbouring villages.
7. Proposed new economic development site proposals are on the opposite side of the Borough to West Horsley

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

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: pslp171/2265</th>
<th>Respondent: 8557953 / Effingham Parish Council (Arnold Pindar)</th>
<th>Agent:</th>
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<td>Section 3.1 Wisley Page 383-4</td>
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<tr>
<td>We do not consider the Green Belt inset should be expanded at Wisley. Indeed, we believe it would be better to reduce the inset to ensure more defensible boundaries and more sustainable development. Guildford Borough Council is defending a current appeal for development at Wisley as an overdevelopment and disproportionate attempt to locate 2068 dwellings within the ancient village of Ockham. The planned inset would result in a similar overdevelopment of the site.</td>
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<tr>
<th>Comment ID: PSLPP16/6255</th>
<th>Respondent: 8557985 / Artington Parish Council (Philip Gorton)</th>
<th>Agent:</th>
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<td>Arlington Parish Council response to the Draft Guildford Local Plan and its direct impact on the Parish Arlington Parish Council (APC), after due consideration of the Draft Guildford Borough Local Plan, would like to comment on those aspects which directly impact Arlington Parish. In particu lar:</td>
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<td>APC strongly objects to the in-setting from the Green Belt of the Mount Browne and the University of Law sites as the case is not made.</td>
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<td>APC strongly objects to the adverse impact that the proposed neighbouring major developments would have on the local minor roads and in particular the B3000, for which there are no mitigating proposals in the Local Plan.</td>
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<tr>
<th>Comment ID: PSLPP16/11409</th>
<th>Respondent: 8559297 / Holy Trinity Amenity Group (Robert Bromham)</th>
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<td>P2 Green Belt, P49.</td>
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<td>We welcome the policy statement “We will continue to protect the Green Belt” but this policy is already compromised by the decision to develop on some green belt areas. We seek a more authoritative policy, and reconsideration of the green belt development proposed.</td>
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<tr>
<th>Comment ID: PSLPP16/6374</th>
<th>Respondent: 8559745 / Mr Brian East</th>
<th>Agent:</th>
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I object to the proposed removal of Send from the green belt area and to all proposals to build on green belt at Send and elsewhere in the borough when there are adequate brownfield areas to accommodate what is really needed.

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

Attached documents:

Comment ID: pslp171/164  Respondent: 8559745 / Mr Brian East  Agent:

I object to the proposal to inset Send Business Park from the Green Belt because it's an old non-conforming user in an area of outstanding countryside adjacent to the Wey Navigation and vehicle access is restricted in both directions along Tannery Lane.

Expansion or development at this location detracts from the openness of the Green Belt and is inappropriate.

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

Attached documents:

Comment ID: PSLPP16/5082  Respondent: 8561057 / Chris Brown  Agent:

I object to the Green Belt realignment which will take Send outside the settlement boundary when there are still brownfield sites available for development in urban areas which will have much less impact on local environment and infrastructure. It has never been made clear by GBC why there is a need for such a vast amount of additional housing in the next 20 years for an area which is primarily residential and not industrialised.

I object to the removal of Send from the Green Belt because the village and its countryside provides a necessary buffer between Woking and Guildford.

I am concerned that GBC is not calculating their requirements correctly and is mixing up the temporary student requirements at places such as Surrey University, with that of the needs of the local Guildford population. At no point in the 50 years I have lived in the area, have I experienced a supposed demand for such an enormous amount of homes required. I have not witnessed this demand from local people or companies, so I can only assume that all these homes will be lived in by people who are outside the GBC area and will be shipped in to live and work. If so, I object to this principal.
The number of homes proposed for Send (693p.a.) is completely disproportionate in the context of a village like Send. The extensive development proposed for Send and elsewhere in this locality such as Garlick’s Arch, Gosden Hill and Wisley Airfield means that, in effect, it will become a ribbon development from Guildford almost as far as Cobham and transform a pleasant rural area into suburbia.

The Green Belt policy has always been very clear. It is to stop urban sprawl and prevent joined up developments. This plan seems contrary to this policy and would appear to work in contravention of this.

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

Attached documents:

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Comment ID: PSLPP16/5086  Respondent: 8561057 / Chris Brown  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

I object to the new boundaries proposed for insetting the villages of Send and Send Marsh/Burnt Common from the Green Belt (policy P2).

The boundaries drawn enclose huge areas of open spaces that should be retained as Green Belt land and not developed at any time in the future. The village boundaries should be much more closely circumscribed to prevent urban sprawl and retain their village identity.

By having such a tightly inset area around the village then the greenbelt will be completely lost forever and urban sprawl will ensue.

With a presumption for development within these ‘inset’ areas, the proposed enclosures would encourage over-development and expansion of the villages in the future and completely ruin their essentially rural nature.

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

Attached documents:

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Comment ID: PSLPP16/5089  Respondent: 8561057 / Chris Brown  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

Fields around Danesfield, Send Marsh (GU23 6LS)

I refer to this area because it is not currently high profile but it is a significant site for other reasons.

I wish to object to this site although it is not specifically mentioned. However, I understand this site is regarded as ‘safeguarded’ and therefore could come into play should some of the sites drop out.

If you look at the maps then you will see that the far end and sides of Danesfield have had their boundaries inset and now the back gardens of these houses now are the proposed greenbelt boundary. As we are surrounded by open fields then this suggests that everything the otherside, ie open fields, would be redesignated as non greenbelt and therefore will be developed.

My comments on this site are as follows:
1. This site is on a flood plain. Over 37% of the site is in flood zones 2 or 3, with over 25% in flood zone 3. Therefore, this land is clearly not suitable for development and this was borne out whenever there is heavy rain and the land floods. I am reliably informed that the area becomes almost a large lake when there is a heavy downpour and this can be seen from the road and footpaths.

2. GBC policy and the Environment Agency are against developing on flood zones and so for this reason the land should not be built on or developed. GBC could face legal action from the Environment Agency if they were to go against this and spend tax payer’s funds to defend such a claim. This would be an irresponsible use of tax payer’s money.

3. I know photographic evidence showing the effect of flooding on the site have been sent to GBC and they have accordingly downgraded the site from a Potential Development Area to a Safeguarded Area.

4. Any building or hard standing will reduce the land available to absorb the run off from heavy rain falls and this will exaggerate the flooding affect. This could cause flooding and damage to adjoining property in Danesfield which may lead to future insurance claims.

5. There are many bats on this site which are protected under The Conservation of Habits and Species Regulations.

6. The access into the site is limited to only two points of entry. One entry is onto the busy Send Marsh Road which is narrow and unsuitable to carry more traffic. This entry point is near to a blind bend so there would be a safety concern and a potential accident black spot with approaching traffic from the direction of Send. The other entry point is into the side of Danesfield where the access is deliberately narrow as it is a residential road where many families live with young children. There is only just enough room to get two cars passing so a massive increase in traffic would be totally impractical as well as dangerous for all the small children who play in the road. Furthermore, there is an old established oak tree on the entry point which would have to be cut down and I believe this has a TPO on it.

7. As a resident of Send for 50 years, and with my family living here and our garden backing onto this site, I am very concerned about what is being discussed regarding potential building on the site. It would be an absolute travesty if this land were to be lost to building. This corner of Send Marsh is of an open rural nature and therefore totally unsuitable for insetting from the green belt.

8. Our village is loved and cherished by all those of us who live here. Send Marsh has a long history of generations of families living here and we all love the open countryside, the lovely walks, the beautiful views and the village life atmosphere. To commence on such a thoughtless and aggressive building program would bring this to an end and would mean that we could never go back to what we once had.

9. The site should not be termed “safe guarded “as the meaning of ‘safe’ does not seem to apply. As I understand the term as used here, this site could be back on the table as a possible contender for consideration for planning permission if other sites do not get their planning granted. There would not be a democratic process for this site to then have a further round of public consultation as the date have already been passed. We would then be at the mercy of GBC and the planners.

10. Send Marsh has already seen a dramatic increase in the traffic flowing through it and into Send village at peak hours with long tailbacks from the traffic lights at Mays Corner. Send Marsh regularly sees delays getting onto the Portsmouth Road at Send Dip with long queues of traffic going towards Ripley and Burnt Common.

11. This site is at the back of Danesfield has limited access onto Send Marsh Road and if this was the only way out then this would put a lot of strain onto an already congested road. If the access was through Danesfield then this would seriously congest our road as it is very narrow and difficult to pass cars at various points.

12. This site should not be removed “inset” from the green belt as this would mean planning permission would surely be granted for the future.

13. The field behind Danesfield is a beautiful open space with much wildlife including deer and foxes as well as lots of birdlife. The field is enjoyed by those in the village who walk and take their dogs by the adjoining footpaths.

14. Send Marsh Road has a very narrow and dangerous bridge which would need to be widened to make it safer and the whole of the Send Marsh Road would need to be overhauled. There is no mention of this in the plan.

15. Send Marsh does not have any infrastructure. There are no local shops, no school, no doctor’s surgery and no public park area. It comprises if mainly all houses and so the addition of so many new houses will put huge pressure on the infrastructure on Send and Ripley, both of which can hardly cope with the current pressures. You would have to walk a considerable distance to access any of these services and so this would mean owners would have to use a car. This would seem contrary to the governments’ policy for us all being green and reducing pollution.

16. The bus routes to and from both villages are very poor and infrequent, about one per hour. Again it is essential to have a car. The roads are too narrow and dangerous for cyclists so this is not really an option.
17. By proposing greenbelt sites in the area means this land will be gone forever. It is essential we protect the greenbelt or we will simply be a concrete jungle joined to Guildford and Woking with no green space in between. These greenbelt areas are essential to everyday living to provide clean and open space for everyone to enjoy.

18. There are plenty of brownfield sites available which should also be considered. In addition, there are sites which have been given planning permission but builders are refusing to build on as presumably, they are waiting for house prices to increase so they can maximise their profits. I feel time limits should be placed on planning permissions granted to encourage building in any economic climate.

19. Send Marsh is poorly served by schools, particularly the secondary school. It has become increasingly difficult to get children into George Abbot which is the closest school to the village. With the amount of houses to be built set to increase, where will the children go to school if we don’t have a plan to build schools?

I would like to place on record my objections which I would like to be seen by the Inspector.

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

Attached documents:

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**Comment ID:** PSLPP16/5528  
**Respondent:** 8561057 / Chris Brown  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

**Policy P2 on page 48**

I object to the Green Belt realignment which will take Send outside the settlement boundary when there are still brownfield sites available for development in urban areas which will have much less impact on local environment and infrastructure. It has never been made clear by GBC why there is a need for such a vast amount of additional housing in the next 20 years for an area which is primarily residential and not industrialised.

I object to the removal of Send from the Green Belt because the village and its countryside provides a necessary buffer between Woking and Guildford.

I am concerned that GBC is not calculating their requirements correctly and is mixing up the temporary student requirements at places such as Surrey University, with that of the needs of the local Guildford population. At no point in the 50 years I have lived in the area, have I experienced a supposed demand for such an enormous amount of homes required. I have not witnessed this demand from local people or companies, so I can only assume that all these homes will be lived in by people who are outside the GBC area and will be shipped in to live and work. If so, I object to this principal.

The number of homes proposed for Send (693p.a.) is completely disproportionate in the context of a village like Send. The extensive development proposed for Send and elsewhere in this locality such as Garlick's Arch, Gosden Hill and Wisley Airfield means that, in effect, it will become a ribbon development from Guildford almost as far as Cobham and transform a pleasant rural area into suburbia.

The Green Belt policy has always been very clear. It is to stop urban sprawl and prevent joined up developments. This plan seems contrary to this policy and would appear to work in contravention of this.

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

Attached documents:

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**Comment ID:** PSLPP16/5531  
**Respondent:** 8561057 / Chris Brown  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the new boundaries proposed for insetting the villages of Send and Send Marsh/Burnt Common from the Green Belt (policy P2).

The boundaries drawn enclose huge areas of open spaces that should be retained as Green Belt land and not developed at any time in the future. The village boundaries should be much more closely circumscribed to prevent urban sprawl and retain their village identity.

By having such a tightly inset area around the village then the greenbelt will be completely lost forever and urban sprawl will ensue.

With a presumption for development within these 'inset' areas, the proposed enclosures would encourage over-development and expansion of the villages in the future and completely ruin their essentially rural nature.

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

Attached documents:

Comment ID: pslp171/1792  Respondent: 8561377 / The Guildford Society (Julian Lyon)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

vv) The Guildford Society has no comment to make on the minor amendments to Policy P2.

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

Attached documents:

Comment ID: PSLPP16/6175  Respondent: 8562273 / The Clandon Society (Christopher Dean)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY P2 – Green Belt

We object to this policy.

1. It does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local Planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development. Green Belt was last taken in the 2003 Plan and now it is again proposed to move the boundaries.

1. The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the Plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

1. Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not
identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

1. The Countryside Study was a simplistic exercise based on the erroneous principle that ranking Green Belt land would identify candidates for development. The Council has not carried out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently Planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

1. We object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt (a term which neither the Plan nor the NPPF defines) and there is no need to inset them. We also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. In effect, each village will become a nucleus for further development. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development.

1. To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. We cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead. This policy is wildly disproportionate in terms of any foreseeable development need and has caused intense opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

1. Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” We believe this should be deleted as an untruth.

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

Attached documents:
The Plan states: “4.3.16 National planning policy requires that Green Belt boundaries are only amended in exceptional circumstances and that this must be undertaken as part of the Local Plan process. We consider that exceptional circumstances exist to justify the amendment of Green Belt boundaries in order to facilitate the development that is needed and promote sustainable patterns of development.”

1. The Plan fails to demonstrate that exceptional circumstances have been identified for each site that is to be taken from the green belt. The scoring system used to classify pieces of green belt was deeply flawed and assumed that because the housing number could not be accommodated on brownfield or previously developed land in the green belt, it is therefore legitimate to move the boundaries. The Plan implies that it is legitimate to have a blanket change to green belt boundaries to meet the housing number. That is not in accord with the NPPF or ministerial statements.

2. The Plan claims that in fact more housing could be delivered than the OAN which implies that excess land is being taken from the green belt. Doubtless some of Woking B.C’s shortfall will be built in Guildford.

3. The green belt appears to be functioning as a resource to be developed whenever the borough claims it is short of development land.

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

Attached documents:

Insetting of the Green Belt behind Heath Drive and Send Road and in the vicinity of St Bedes Junior School Send Hill

Taking the villages out of the Green Belt leads to windfall sites which could mean Send Village could have even more developments than are currently set out in the proposed plan.

Much of this land forms part of the Wey Navigation Corridor which should be protected. This land in turn provides habitation for a great deal of wildlife - foxes, bats, birds etc. It provides a beautiful green backdrop to walkers on the tow path and for distant views from Old Woking and Pyrford.

The statement on page 116 4.6.39 states that "The River Wey Navigation is owned and managed by the National Trust (NT) and is a highly valued asset of borough wide significance, both as an important element of our borough's biodiversity and as a very significant public space. The NT has compiled a set of guidelines for what it considers important characteristics of the river, and how this should be managed.

These include the importance of the river as a 'visually important open corridor' and 'an important leisure asset' as well as a Conservation Area.

Insetting land at St Bedes Junior School, Send Hill will go against what was stated in a recent Planning Permission granted which stated when the St Bedes School was demolished the land would be returned to Green field. Removing the Green Belt status would present this land to developers.

Removing the Send Lakes from the SNCI designation.
This means that there is the potential for these lakes not to be so well tended and the risk of flooding in the area to rise. At present a dedicated team tend the lakes, which is a joy for all the villagers to appreciate. It is an area that is a magnet for wild life.

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

Attached documents: 2.JPG (21 KB) 1.JPG (42 KB)
Proposal to ‘inset’ West Horsley by introducing new Green Belt boundaries to enable the village to be removed from the Metropolitan Green Belt

Report page: 10

WHPC view: Objects Strongly

In brief: No Exceptional circumstances presented to justify changing / adding to Green Belt boundaries. Proposal does not meet NPPF Policies. West Horsley South in High Sensitivity Green Belt (land parcel D6). Inconsistent land parcel sensitivity in Borough wide classifications. P2 Policy wording does not mention ‘insetting’ of several villages

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

Attached documents:

Comment ID: PSLPP16/17465  Respondent: 8563201 / West Horsley Parish Council (Sam Pinder)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

POLICY P2: Green Belt

Policy P2 states that: We will continue to protect the Metropolitan Green Belt … against inappropriate development”

WHPC only supports this opening statement.

Regrettably, despite such forthright words, GBC appears to be in breach of this policy itself, through the housing policies set down in the Draft Local Plan. Analysis of the breakdown included under Sites (p122), reveals that around 65% of the developments, some 8,202 dwellings, are proposed to be built on land currently within the Metropolitan Green Belt (see pie charts above). These inappropriate development proposals flagrantly ignore the opening statement of Policy P2 as well as the stipulations set out in NPPF paras 83 to 87. No ‘exceptional circumstances’ are advanced to justify the introduction of new Green Belt boundaries to enable the land at the many locations in the Borough to be used for building homes on.

Under NPPF policy, a Local Authority may impose constraints on the delivery of new dwellings, e.g. through the need to protect the Metropolitan Green Belt or the protection of the Surrey Hills Area of Outstanding Natural Beauty (NPPF protection comparable to that of a national park) or for other reasons such as lack of necessary infrastructure. Notwithstanding that proposed Green Belt areas to be built on, account for a significant percentage (over 6%) of the land area of the Borough, GBC has stated on several occasions to full Council Meetings that “no constraints will be applied to the OAN” to reduce the need to deliver dwellings on Green Belt land through the Plan Period.

WHPC, like other parish councils, finds this approach inexplicable, irresponsible and unsound.

WHPC objects to GBCâ€™s proposed imposition of new Green Belt boundaries and the extensions to current village Settlement Areas boundaries proposed under this policy. These are responded to in sections (a) â€˜insettingâ€™ and (b) â€˜Settlement Areas extensionsâ€™ below. The two sections are mutually interdependent in terms of NPPF policies.

Paragraph 4.3.13: Proposal to inset West Horsley from the Green Belt

Response: WHPC strongly Objects to the proposal to inset West Horsley from the Green Belt and requires this proposal to be removed from the Local Plan

Policy P2 proposes that West Horsley should be inset from the Green Belt, instead of being ‘washed over’ as it is today. Currently development is permitted within the Settlement Area, although it is still Green Belt with particular planning policies being applicable.
West Horsley is set in a rural location and the village has the look and feel of a rural village. Its Green Belt status has been a key factor in preserving that character. Moreover, being ‘washed over’ by the Green Belt has not been a serious constraint on development within the village. Today West Horsley is a picturesque and lively rural community, which has and continues to experience incremental growth, despite the continuing lack of sufficient infrastructure. The parish of West Horsley’s open, semi-rural character makes an important contribution to the openness of the Green Belt in this part of the borough. This is a specific and differentiating characteristic of West Horsley over its neighbour, East Horsley, which the Council and its consultant Pegasus Planning has failed to recognise.

The assessment of sensitivity in the context of the five purposes of Green Belt set out in GBC’s Green Belt and Countryside Study is flawed. The land parcels used to assess sensitivity are ill considered and mask significant variations in function and character of different areas within each land parcel. As a consequence, the conclusions drawn are subjective and inconsistent and do not provide a robust basis from which objective decisions can be made. The inconsistent conclusions about the extent to which different land parcels can be seen in the Green Belt Purposes Schedule and Green Belt Sensitivity Map (ref Vol. III Appendix 1 and Appendix 2). To be specific: land parcels are scored against four of the criteria laid out in NPPF para 80 and then categorised by their resulting land parcel score as follows: 3/4 = High Sensitivity, 2 = Medium Sensitivity and 1 = Low Sensitivity Green Belt. Based on their Green Belt sensitivity grading villages were then targeted for ‘insetting.’ The selection or targeting of villages to be ‘inset’ and those not to be ‘inset’ when scrutinised against their land parcel score and grading is demonstrably very inconsistent. For example: -

- West Clandon: no insetting proposed for south of railway line - Land parcels D1, D2 High Sensitivity, score 4 Settlement north of railway / west of main road - Land parcel C4, High Sensitivity, score 3 (similar to West Horsley South).
- Housing area, north of railway / east of main road. Land parcel C4 Medium Sensitivity, score 2 with no enlargement of the Settlement Area or insetting proposed, despite being close to a railway station on Guildford to London line.
- Burnt Common + Send Marsh: Land Parcels B11 to B15, Medium Sensitivity all scoring 2. Insetting proposed. No PDAs and minimal enlargement of Settlement Area (to embrace existing housing).
- East Horsley: Land Parcels D6, D7 High Sensitivity score 3. Insetting proposed.
- West Horsley: the whole village, both to the north (Land Parcel C14) and the south (Land Parcel D6) of the railway line that divides the village, passes the test for remaining ‘washed over’ as the village makes an important contribution to the openness of the Green Belt. (see also 2.13, 2.14 and 3.0 Sites Critique - Planning Assessment - Appendix 2). Inside the northern Settlement Area there is an average housing density of 9.9 dwellings per hectare (dph).
- West Horsley South is categorised as High Sensitivity, score 3. The southern half of the village has around 40 Listed buildings and many more historic buildings, a Conservation Area and a lower residential density of about 6 dph. Existing housing densities per hectare in both of the village Settlement Areas are shown on the map overleaf. The proposed dph for development Sites A38 to A41 is also marked on the map. Proposed densities substantially exceed the character density surrounding these Sites.
- Woodlands and large residential gardens make a vital contribution towards biodiversity, provide wildlife corridors, and furnish those open spaces which are vital to the character of the Green Belt. Visit the village of West Horsley and appreciate how the Green Belt has preserved the rural character and openness of the village.
- The case put forward in the Local Plan Evidence Base proposing the insetting of the villages of West and East Horsley, both predominantly located in High Sensitivity Green Belt Land Parcels is inconsistent, weak and non-compliant with NPPF policies. No Exceptional Circumstances are demonstrated.

**Paragraph 4.3.16 and Proposals Map: Settlement Areas extensions in West Horsley**

GBC are proposing to make a number of changes to the Current Settlement boundaries of West Horsley and so expand the Settlement Area, as set out within the Green Belt & Countryside Study prepared by GBC’s consultants, Pegasus Planning.

WHPC Objects to the Settlement Areas extensions changes proposed. Each is dealt with below:
1. There is a proposal to move the West Horsley settlement boundary westwards from behind the houses on the west side of Northcote Road to Long Reach, to include all the dwellings in East Lane, Greta Bank, Woodside, Farleys Close and the east side of Long Reach. The new northern boundary of this extended settlement area would be a post & rail fence with hedge, the southern edge of Ben’s Wood, both of which are NOT highly defensible Green Belt boundaries. Under NPPF rules Green Belt boundaries should only be changed in ‘exceptional circumstances’. The non-sustainability of site A38 and its importance to the openness of the Green Belt is reviewed in detail in the ADN Planning Assessment Report submitted in Part 2. Overall therefore, the proposal to extend the current Settlement Area westwards cites no ‘exceptional circumstances’ and is an invalid proposal.

2. There is a proposal to move the East Horsley settlement boundary westwards from behind the houses on the west side of Ockham Road North to the Western boundary of Lollesworth Wood, to create site A39. This proposal removes over 5 hectares of agricultural fields from the Green Belt. The present boundary line is clearly defined by a deep and well-maintained drainage ditch which is classified by the Environment Agency as a ‘main river line’ and therefore represents a highly defensible Green Belt boundary.

Moving this boundary west to the edge of woodland in no way improves its defensibility. Under NPPF rules Green Belt boundaries should only be changed in ‘exceptional circumstances’. The proposal cannot be considered as an exceptional circumstance and the only reason for this change is to bring a large agricultural field within the settlement area to provide more housing land. However, under NPPF rules this is not a sufficient justification for changing a Green Belt boundary.

3. There is a proposal to move the West Horsley settlement boundary northwards and westwards to take in the existing houses on the west side of Ockham Road North, houses on Green Lane and the private Close off Green Lane (sometimes referred to as ‘Bungalow Road’) to the proposed western boundary of site A40. This proposal removes over 8 hectares of paddock, garden land (Oakland ‘Farm’) and an established line of mature trees along the eastern edge of the Oakland Farm land from the Green Belt. The present boundary line on the southern edge of Site A40 is the hard northern edge of housing along Nightingale Avenue. The proposed western boundary on the edge of woodland and around the Camping & Caravanning site’s lake does not improve its defensibility. Under NPPF rules Green Belt boundaries should only be changed in ‘exceptional circumstances’. The proposal cannot be considered as an ‘exceptional circumstance’ and the only reason for this change is to bring the field within the settlement area to provide more housing land. Under NPPF rules this is not sufficient justification for changing a Green Belt boundary.

4. A further proposal is for the addition of Green Belt land on the south side of East Lane and to the east of Lollesworth Lane to the West Horsley settlement area to enable Site A41 to be created. The proposed eastern boundary along the western edge of a former tree nursery (sic: now woodland) and hedging to an area of grazing land is not defensible and lacks permanence. The southern edge of this proposed piece of settlement area goes beyond the indicated Site A41 to woodland adjacent to the northern edge of the railway line. An existing paddock between A41 and the woodland would result from the proposal and be potential land for infill development. Under NPPF rules Green Belt boundaries should only be changed in ‘exceptional circumstances’. The proposal cannot be considered as an ‘exceptional circumstance’ and the only reason for this change is to bring the field within the settlement area to provide more housing land. Therefore under NPPF rules there is not sufficient justification for changing a Green Belt boundary.

5. The existing West Horsley South Settlement Area (where no major PDAs are proposed) is wholly within High Sensitivity Green Belt Land Parcel D6, with a number of extensions proposed along its eastern and western boundaries. The largest extension proposed to this South Settlement Area is at the south-east corner, where Cranmore School and its grounds plus woodland on the west side of Little Cranmore Lane would be taken into the Settlement Area. WHPC submits that extension of the existing South Settlement Area at all the various locations, is purely being proposed in order to add land for potential inappropriate infill development. No justification is provided for these Settlement Area extension proposals and under NPPF rules ‘exceptional circumstances’ need to be advanced to justify Green Belt boundary changes. Further, most of the new boundaries proposed have poor or nil defensibility. Therefore under NPPF rules there is not sufficient justification for the proposed enlargement of the Settlement Area.

In the Green Belt & Countryside Study and accompanying Topic Paper, GBC attempts to justify its rationale for making changes in settlement boundaries in order to meet unfulfilled housing need in the Borough. Green Belt rules, however, are clear that unfulfilled housing need is not ‘an exceptional circumstance’.

The NPPF is clear that all changes to or movement of settlement boundaries must be justified by ‘exceptional circumstances’. GBC have offered only a generic justification in their Topic Paper of meeting unfulfilled
housing need. No case by case justification has been provided. Thus WHPC believes strongly the settlement boundary changes referred to above (plus many others) are invalid without individual detailed justification.

**Paragraph 4.3.17: Proposal to remove Wisley Airfield from the Green Belt**

WHPC OBJECTS to the proposal to remove Wisley Airfield from the Green Belt. The only justification for this proposed change is unfulfilled housing need which is not considered an exceptional circumstance. Without wishing to extend this letter, WHPC unequivocally supports the views of East Horsley Parish Council re Wisley Airfield, set down in their letter of 4th July 2016 to Planning Policy GBC (copy attached).

**POLICY P2: Limited In-filling**

**Response: WHPC Objects to this Policy**

A new planning designation has been introduced called ‘the identified boundary of the village’.

Though not applying to West Horsley, nevertheless WHPC finds it difficult to reconcile Policy P2’s opening statement that “We will continue to protect the Metropolitan Green Belt” with any further reduction in effective Green Belt status. Where this policy is proposed to be applied (e.g. East Horsley south of A246) it represents a de facto extension of the Settlement Boundary and a substantial reduction in the operational effectiveness of the Green Belt.

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

Attached documents: WHPC Draft Local Plan response July 2016.pdf (2.2 MB)

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<table>
<thead>
<tr>
<th>Policy No. and title</th>
<th>2016 WHPC position</th>
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<tbody>
<tr>
<td>P2 – Green Belt</td>
<td>Objects strongly</td>
<td>WHPC fully supports GBC’s policy statement of protecting the Green Belt from inappropriate development but objects to GBC proposals to build 65% of the proposed new dwellings on Green Belt land.</td>
<td>Objects strongly. Opening statement in Policy at (1) is supported</td>
<td>Exceptional circumstances must be demonstrated to develop in the Greenbelt, yet despite the weight of public and parish council opinion against weakening of this policy, Over 70% of new housing development will be in the countryside, of which, 65% is proposed in Greenbelt. By definition, this is not an exception and no attempt is made to demonstrate exceptional circumstances, in line with the requirements of the NPPF. The insetting of villages and extension of current Settlement Area boundaries is opposed</td>
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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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

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<td>New planning designation introduced titled ‘the identified boundary of the village’. Does not fit with Policy P2 for preventing inappropriate development</td>
<td>Objects</td>
<td>Limited infilling policy within extended Settlement Boundaries will be opposed</td>
</tr>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/411  Respondent: 8563713 / P-Fava.Consulting (Mr Peter Fava)  Agent:

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

I object to the proposal to inset Send Business Park from Green Belt because it is effectively an old non-conforming user in an area of outstanding countryside adjacent to the National Trust’s Wey Navigation.

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

Attached documents:

Comment ID: pslp171/1451  Respondent: 8564961 / Mr Daniel Palmer  Agent:

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

1. Removal from Green Belt of homes in Guildford Road, Northern end of Glaziers Lane, Flexford, Walden Cottages & Palm House Nurseries traveller site

I object to this as placing these homes outside of the Green Belt could enable development within these areas at much higher density and will give greater success for planning applications.

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

Attached documents:

Comment ID: PSLPP16/377  Respondent: 8565153 / Mr David Gianotti  Agent:
Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

- I object to all erosion of the green belt;

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

Attached documents:

Comment ID: PSLPP16/5983  Respondent: 8565185 / Mr Dave Robins  Agent:

I OBJECT TO all erosion of the Green Belt. Once we use this for building it will be lost forever. There are plenty of Brown Field sites to be built on first before using the Green Belt. The Green Belt is a buffer between Woking and Guildford

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

Attached documents:

Comment ID: PSLPP16/3864  Respondent: 8566049 / Mr David W Lazenby  Agent:

I OBJECT to the proposal to take Send out of the Green Belt, which is outrageous in these times. Send is currently the major buffer between Guildford and Woking. It fulfils the precise intentions of the Green Belt concept, and its status should be maintained as such.

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

Attached documents:
Objections to the Guildford Local Plan

I object to the proposal to remove the Horsleys from the Green Belt. The government clearly restated the principal that Green Belt should not be sacrificed for development. Guildford Borough Council has not demonstrated any valid reason for removing the Horsleys from the Green Belt.

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

Attached documents:

Comment ID: PSLPP16/3158  Respondent: 8568193 / Miss Edwina Attwood  Agent:

3.1 OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’) and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and neighbouring villages merging into each other. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

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

Attached documents:

Comment ID: PSLPP16/924  Respondent: 8569729 / Eric Payne  Agent:

Policy P2. Send should retain its green belt. I object to plans to remove areas from green belt status. In particular land behind the school including playing fields. With the middle school combining with the first school it would seem likely that the middle school site would be under pressure for redevelopment, which does not seem to appear in the plan. Any development here would exacerbate the traffic congestion in Send Hill and Send Road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to Policy P2 green belt

This policy states, “the general extent of the Green Belt has been retained.” This is a misleading statement. The policy wording is weak in support of the Metropolitan Green Belt even though the latter forms 89% of the borough and should be the cornerstone of all local planning policy. It is precious beyond the short-term demands of the present Government’s policy or a 15-year local plan. As noted under Policy S1 above, it is a solemn legacy to future generations – an asset and amenity that belongs as much to Londoners and the whole nation as to the people who live in it. Once gone it is gone forever. It is not the Council’s to give away. Policy P2 completely fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it has been around for a long time and it needs to be permanently protected. It was actually established in a local act of parliament in Guildford under the London Home Counties (Green Belt) Act 1938 and subsequently in the 1944 Greater London Plan to contain the outward sprawl of London. The boundaries of the Green Belt through Guildford Borough were later defined in the 1987 Local Plan, forming part of a 19-24km concentric belt around London. The Green Belt is intended to check the unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and other urban land. The principles of the Green Belt designation were outlined within Planning Policy Guidance 2: Green Belts (PPG2) and are found within the National Planning Policy Framework (NPPF). The Metropolitan Green Belt is an exemplar of good planning and the envy of planners throughout the world. Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. Building on it involves high opportunity costs, including an irreversible loss of:

1. Agricultural production
2. Rural leisure and tourism amenities
3. Water catchment
4. Flood control
5. Biodiversity
6. Natural heritage
7. A carbon sink for air pollution
8. Room for public facilities such as parks and burial grounds
9. Profitable film locations (e.g. Shere)
10. Future economic potential such as mineral extraction (even fracking)
11. Natural beauty, landmarks, open space, rural views and sight lines
12. Benefits to public health and wellbeing, physical and psychological (as well expressed in the NPPF) As a matter of law and national and local policy, these assets should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultations. It is quite incorrect to argue, as the Council

This is in breach of party manifesto commitments and contrary to previous responses to public consultations. It is quite incorrect to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold. I object to the “insetting” of 14 villages from the Green Belt. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost hell bent on self-defeat. I believe this policy is based on a flawed Green Belt and Countryside Study that, according to one Conservative Councillor, was irregularly commissioned by Council officers without the authority of Councillors.

To “inset” two thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, although they would quickly destroy them if the proposed “insetting” and boundary extensions go ahead.

I object to the removal of over 400 hectares of Green Belt land in and around Blackwell Farm to facilitate further development of Surrey Research Park and for 1800 homes. Over 60 hectares were removed from Green Belt 12 years ago for the same developer (Surrey University) who has yet to fulfill their planning obligations. This valuable land has been squandered with over 17 acres of surface car parking and as one of the key features of Green belt is its ‘permanence’ this second request for yet more Green Belt land to be released in such a short space of time, with all the outstanding issues that remain makes this all the more objectionable.

Furthermore I object on grounds of the impact this development will have in terms of congestion on our highways, these issues have been highlighted under ‘infrastructure’.

Exceptional circumstances have not been demonstrated for the removal of Greenbelt land which in my view, makes this policy unsound.

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

Attached documents:

Comment ID: PSLPP16/2202  Respondent: 8570273 / Fiona Curtis  Agent: Fiona Curtis
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

I object to ALL Green Belt sites allocated for development in the local plan object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development, however, it does identify the principle of development and uses.” This ignores the tens of thousands of detailed comments the Council has received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014.13 All Green Belt sites should be removed from the plan until “exceptional circumstances” for development are proven, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established.
I object to the inclusion of Greenbelt sites where exceptional circumstances have not been given. Housing need alone has in case law, been overturned and the housing need is highly questionable. We question the soundness of 66% of almost 14,000 homes being proposed on Greenbelt land and whether any circumstances could warrant this.

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

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<th>Respondent: 8570273 / Fiona Curtis</th>
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</table>

I object to the GBC Proposed Submission Local Plan particularly the changes relating to Ripley and Send.

I object to the extended development in the green belt (policy P2 site). The area is already extremely congested and this will result in unacceptable traffic issues, together with the merge of Send and Ripley.

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

**Attached documents:**

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<th>Comment ID: pslp171/2326</th>
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</table>

**Policy 2 Greenbelt**

| 4.3.13 | The Local Plan process is not complete yet 14/15 villages have been 'inset' or had greenbelt status removed. This would appear to be jumping the gun? The criteria relates to their openness, or lack of the same. Yet the Hog's Back, which is an entirely open stretch of Greenbelt, is the subject for large scale development. Openness appears to be entirely subjective and where development is possible, it is being shoe horned in and policies are twisted or diluted to facilitate this. Greenbelt policy is nothing short of a shambles. |

| 4.3.16 | It is not good enough to simply say that exceptional circumstances exist, they must be clearly demonstrated and justified and this is not the case. I therefore strongly object. |

| 4.3.17 | The characteristics of the Hog's back run in an East/ West direction and it is nonsensical to remove vast swathes of Greenbelt to facilitate coalescence at |

Object due to omission

Object
the Guildford end (Blackwell Farm) whilst adding Greenbelt at the Ash end, to

| 4.3.17 | The characteristics of the Hog's back run in an East/ West direction and it is nonsensical to remove vast swathes of Greenbelt to facilitate coalescence at the Guildford end (Blackwell Farm) whilst adding Greenbelt at the Ash end, to prevent coalescence with a much smaller area? There is an obvious lack of consistency here and concerns raised about the rationale (that the current and previous lead of GBC are / were Ash Cllrs) has not been addressed. Policy P2 -- What it says it will do and what it actually does are two very different matters. Ie it will be protected against inappropriate development unless exceptional circumstances are demonstrated. Yet 70% of development is in countryside and 58% on Greenbelt, without any justification by way of exceptional circumstances. |

| 4.3.18 | This should be retained, as the context is lost without this. It also makes no sense to remove Greenbelt status from 15 villages on the basis of their contribution to openness, whilst at the same time diluting a policy to protect openness? |

| Key Evidence | Should include the NPPF, which has been removed. |

| Monitoring Indicators | Should refer to both number and percentage as percentage alone can be used to obfuscate real volume. |

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

Attached documents:

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**Comment ID:** PSLPP16/9958  **Respondent:** 8570305 / Gareth Porter  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

*I strongly object* to the erosion of the Green Belt. All Green Belt sites should be removed from the plan until “exceptional circumstances” for development are proven, as stipulated repeatedly in the NPPF.

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

Attached documents:

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**Comment ID:** PSLPP16/6083  **Respondent:** 8571137 / G Mansbridge  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

**I strongly object** to the erosion of the Green Belt. All Green Belt sites should be removed from the plan until “exceptional circumstances” for development are proven, as stipulated repeatedly in the NPPF.

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

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

1. I OBJECT to your plan for Send Village and Send Marsh being removed from the Green Belt, which is permanent according to the National Planning Policy Framework. There are no Special Circumstances that justify this action.

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

Attached documents:

Comment ID: PSLPP16/16841  Respondent: 8571137 / G Mansbridge  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

I OBJECT to your plan for Send Village and Send Marsh being removed from the Green Belt, which is permanent according to the National Planning Policy Framework. There are no Special Circumstances that justify this action.

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

Attached documents:

Comment ID: pslp171/1480  Respondent: 8571137 / G Mansbridge  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

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

I object to POLICY 2 paragraph 4.3.15 to inset Send Business Park from the Green Belt: because Tannery Lane is totally unsuitable for a large increase in traffic being a single track road and the area is an outstanding countryside amenity.

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

Attached documents:

Comment ID: pslp171/183  Respondent: 8571617 / Gordon & Jane Farquharson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

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

In view of flawed new evidence, Guildford’s proposal for more than 12,426 homes (plus a buffer of 1,155 homes) is excessive and will result in needless loss of Green Belt and green character, and increased congestion, that cannot be justified in our heavily constrained borough.

There is evidence Guildford’s population growth is overestimated by about 40% because of under-recording of students leaving at the end of their studies.

If the Council fails to apply Green Belt protection or constrain expansion to reflect widespread, legitimate environmental and transport constraints, the 2017 Plan will cause harm to the qualities that underpin the economic success of Guildford and aggravate congestion.
The Council completely ignores the objective of Green Belt to avoid urban sprawl. For example, the development of Gosden Hill Farm simply perpetuates the sprawl of Merrow Park Eastwards. At the very least, the plan should skip a few fields, develop Wisley Airfield first, and then work back towards Guildford if the high numbers of houses are required post this plan.

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

Attached documents:

Comment ID: pslp171/184  Respondent: 8571617 / Gordon & Jane Farquharson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Allocating too much land for development in the 2017 Plan will also result in Guildford being required to provide homes for Woking on our Green Belt which is folly given the constraints in Guildford, a gap town with constricted roads set in the Surrey Hills AONB.

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

Attached documents:

Comment ID: PSLPP16/16197  Respondent: 8573505 / Anthony & Hazel Teal  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The development of nearly 14,000 homes over a 20 year period is unsustainable without a complete loss of character to those centres included within the proposed extensions to various urban areas and villages. This policy does not appear to recognise these existing regions simply do not have the necessary road and other infrastructure capable of coping with expansions on this scale or magnitude and is therefore unsustainable. This excessive development appears skewed towards the northern sector of the borough. While Woking and Waverley are willing to apply constraints to their housing growth, Guildford is not and the uniqueness of villages such as Clandon, Ripley and Send appear destined to be enmeshed in an urban sprawl.

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

Attached documents:

Comment ID: PSLPP16/13039  Respondent: 8573793 / Harry Eve  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object

58. I place a very high value on the Green Belt and the contribution that it makes to public health and wellbeing, physical and psychological, not only for the current residents of Guildford but also for Londoners and for future generations. This policy extends the destruction of Green Belt land proposed by the flawed Green Belt and Countryside Study and proposes
allowing infilling in the Green Belt through the creation of “village boundaries”. This is a major change from the earlier draft local plan that has not been consulted on previously. Far from being a “Protecting Policy” it is a policy aimed at weakening planning restrictions in the Borough’s countryside.

59. This policy appears to be an invitation to developers to seek to infill anywhere in the Borough regardless of Green Belt designation.

60. I object to the insetting of villages. For example, East and West Horsley are low density village areas that do contribute to the openness of the Green Belt and there are no exceptional circumstances for removing their Green Belt status. I object to the extending of their settlement boundaries which has been proposed simply to accommodate the wishes of developers to build on the Green Belt in an area that attracts high prices for market housing.

61. Guildford Borough Council have tried to overcome residents’ opposition to Green Belt removal by spinning their messages, introducing a subjective sensitivity assessment and using misleading statistics including a major understatement of the area of Green Belt to be removed.

62. I have a particular objection to the proposed village boundary described as Horsleys – East Horsley (south) and this is dealt with below under the heading Appendix H Maps.

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

Attached documents:

Comment ID: pslp171/1681  Respondent: 8573793 / Harry Eve  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

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

I object to the proposed changes. Far from protecting the Green Belt and scrapping the seriously flawed Green Belt and Countryside Study, Guildford Borough Council is undertaking further insetting and weakening Green Belt protection by also adding another “identified settlement boundary”. There is no genuine justification for removal of Green Belt protection or weakening protection of areas that remain within the Green Belt.

Guildford Borough Council has no mandate to reduce its area of Green Belt but proposes doing so on a massive scale. Most of the proposed housing development has been assigned to Green Belt sites.

I object to the “identified settlement boundary” of “East Horsley (south)” which includes a number of large fields and areas of special biodiversity. Access to much of it is only by a narrow single-track lane of high landscape value. It is clear that no serious thought was given to the areas designated or to the boundaries.

There is an anomaly between the approach taken here and for Policy P3. The new identified settlement boundaries will allow unnecessary development in the Green Belt countryside in the form of infilling.

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

Attached documents:

Comment ID: PSLPP16/8001  Respondent: 8574369 / Douglas French  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to the Local Plan because it seeks to build on Green Belt land unnecessarily. The work of Professor Anne Power at the London School of Economics, amongst much other expert research, clearly demonstrates that there is more than sufficient land to build all the houses that are needed without taking any of the Green Belt. In our area several studies show that unused brownfield sites in Guildford Town itself are capable of yielding most of the required land. GBC has not properly explored the capacity which is available there or on brownfield sites elsewhere in the borough, which would have provided a sensible starting point since GBC owns many of them.

I OBJECT to the Local Plan in that GBC’s approach to the Green Belt introduces a concept of grading its quality. This is an alien concept, not recognised in law. Of course some Green Belt is seen to be better than other Green Belt but the law does not make any distinction, nor should it. It depends who is looking at it and from what standpoint they are looking. Green Belt is Green Belt and it is not for GBC to stand in judgement on what bits it thinks are worth keeping and what are not.

I OBJECT to proponents of the plan representing those against it as “nimby’s”. Those against are not against building houses. They recognise the need for them. They are against building them in unsuitable, unthought out locations which damage existing amenities. This relates particularly to building them on Green Belt land, thereby destroying an existing amenity, when it is not necessary to do so.

I OBJECT to the Local Plan because it seeks to promote sites for houses with woefully inadequate attention being paid to the infrastructure to support those sites. Without proper infrastructure none of the identified sites will deliver what is claimed for them. No detailed thought has been given to the form of the infrastructure required, still less to how much it would cost and, it would appear, none at all to where the money for it would come from.

I OBJECT to removing Send and other villages from the Green Belt. The Green Belt was intended to be permanent, and its permanence was enshrined in law through the National Planning Policy Framework, reinforced by the NPPG and a succession of Ministerial guidance statements. For all of this to be overridden requires “special circumstances” which do not exist in the case of Send.

I OBJECT to all four proposed sites in Send because they are all in the Green Belt and not one of them displays the very special circumstances which would be needed in order to outweigh the substantial harm caused by reason of inappropriateness. There is abundant legal authority but I would cite the Court of Appeal cases of City of St Albans v Hunstan Properties and Gallagher Homes v Solihull Metropolitan Council. These precedents, which have been ignored by Guildford Council before, show that it is necessary to demonstrate that harm to the community at large, by taking the Green Belt, would be less than if it was not taken. The crucial words are “to the community at large”. Paragraph 47(1) of the NPPF advises local authorities “to ensure that their local plans meet the full, objectively obsessed, needs for markets and affordable housing in the housing market area as far as is consistent with the policies set out in this framework”. As the Court of Appeal has made clear one cannot rely on objectively assessed needs without having regard to the policy constraints. The qualification in this clause “as far as is consistent with” is not qualifying housing need; it is qualifying the extent to which the local plan should go to meet those needs. It is quite clear from the precedents that exceptional circumstances will not exist unless the potential harm to the Green Belt has been shown to be clearly outweighed by other considerations. In other words harm to the Green Belt is included in the factors which the NPPF requires to be taken into account.

The NPPF further states that in their local plans local authorities are required to meet objectively assessed housing needs “as far as is consistent with the policies set out in this Framework”. The policies referred to include Section 9 - Protection of the Green Belt. The Court of Appeal has clarified the interpretation of this by stating categorically that there may be nothing very special about a housing shortfall in an area which has very little undeveloped land outside the Green Belt.

The key question is not “is there a shortfall in housing land supply?” You have to ask “have special circumstances been demonstrated to outweigh the Green Belt objection?” And such circumstances are not demonstrated simply because there is a less than five year supply of housing land. Special circumstances will not exist unless the potential harm to the Green Belt is clearly outweighed by other considerations. The draft plan has not begun to demonstrate that there are exceptional circumstances and indeed offers very little to suggest that the authors have even read what the Court of Appeal has said about the provisions in the NPPF.

It is noted that the Court of Appeal precedents have been ignored before by GBC, which appears to regard itself as over and above the law. GBC seems willing to expend residents’ funds on counsel’s advice, in support of what its client
developers want to do, but cannot bring itself to get a QC’s opinion in order to guide it on understanding the case law that actually exists, which manifestly it does not understand.

Given the large amount of Green Belt in Guildford Borough, the council can legitimately argue that it does not have to match the housing targets of boroughs with less Green Belt. But if Guildford wants to match the housing target which would apply if it was not constrained by the Green Belt, it can still do so using brownfield land which is in plentiful supply. It is difficult to avoid the conclusion that it has not taken either of these legitimate routes because it finds the allure of developers’ propositions on green field sites more attractive. GBC should also note that the Green Belt was created not just for the benefit of local residents. It came to be known as the Metropolitan Green Belt because it was intended to be of benefit to a much wider range of people, especially Londoners visiting open spaces outside but near to London. It is beyond the remit of GBC to arrogate to itself the power to override Parliament’s intention.

I OBJECT to any sort of diminution of Send’s Green Belt because it provides an essential buffer stopping Woking and Guildford becoming one conurbation. It has served this purpose effectively since its inception and should continue doing so for the benefit of subsequent generations living here. No group of councillors, especially without a mandate, has the authority to impose a different future on residents.

I OBJECT to any reduction in Send’s Green Belt because so much land in Send provides the setting for the beautiful Wey Navigation corridor, which is a conservation area that enhances biodiversity, is visually important, provides a valuable leisure facility and combined with the surrounding lakes an exceptional habitat for a wide range of bird species and other wildlife.

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

Attached documents:

Comment ID: pslp171/1916  Respondent: 8574369 / Douglas French  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

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

Green Belt Policy 2 at paragraph 4.3.15 Send Business Park

2.1 I object to the proposal to inset Send Business Park from the Green Belt without any evidence being offered to justify it. Send Business Park is for historical reasons in an inappropriate location even for its existing operation and totally unsuited to become a “strategic employment site” as opposed to a “locally significant employment site”. It is an old non-conforming user in a Green Belt location adjacent to the beautiful Wey navigation, which is a conservation area. Any further development there is inappropriate and will detract from the openness of the Green Belt.

2.2 Although this proposal was included as part of site 67 in the 2014 draft plan, it was removed in 2016 following representations. It has now been put back in, which is a good example of why earlier objections are highly relevant and must be included in the material received by the Inspector. Since it was removed last year because it was considered to be in an area of high Green Belt sensitivity, it is difficult to fathom why, a year later, it is not regarded as being Green Belt sensitive at all.

2.3 I specifically object to the undeveloped field (currently separating the end unit at Send Business Park and the Narrowboat Basin Site currently under development) from losing its Green Belt status. Despite action over the last few years which has made it look steadily more derelict, by parking old vehicles on it and leaving them there for months, that Green Belt field still affords views over the Wey Navigation and the countryside beyond. The openness of the Green Belt would be severely damaged by further development on this site. It has also been noted by a frequent walker that over the last two years the car park has been stealthily increasing in size at the expense of another field. Such encroachment without planning permission is to be deprecated.

2.4 The site lacks adequate access for a strategic employment site because Tannery Lane is very narrow, twisty and dangerous, in parts single track and completely unsuited to commercial and industrial traffic. Given that there are many
potential employment sites in Guildford Borough with good access it is to say the least perverse to try to promote one which in so many respects is manifestly unsuitable.

2.5 The Employment Land Needs Assessment 2015 recognised that Send Business Park has poor access for traffic and public transport and other serious shortcomings for an employment site. The volte-face shown in the 2017 ELNA, where without explanation completely opposite conclusions are reached, requires some explanation. Given that neither the site nor the attendant infrastructure has changed in that period how can “very poor access to public transport suddenly become “good” access to public transport when the available public transport has not changed?

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

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Policy P2: Green Belt
This broadly reflects current national policy

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

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P2 Protecting - Green Belt
Support (but on the condition that the proposed inset boundary for Effingham is amended.)

EPC supports the insetting of Effingham in so far as it is consistent with the NPPF and Effingham’s emerging Neighbourhood Plan. However, we believe that the insetting boundary shown in the LP is incorrect and should be amended. This applies to the inset boundary to both the east and west of the village.

Requested inset boundary change to the east of the village.

EPC propose the following amendments to the inset boundary to the east of the village. The requested inset boundary change starts at the A246/Browns Lane junction. Instead of turning into Browns Lane it continues down the A246 to the traffic lights and the junction with The Street. It then continues along The Street until Chapel Hill. It turns into Chapel Hill and at the junction of Chapel Hill and Church Street continues straight across the road (Church Street) onto footpath FP118. This footpath, which goes to the north of the St Lawrence Church, joins up with the LP proposed inset boundary at the north west of the KGV fields, where it also intersects with FP118.

EPC propose this amendment as it follows a more clearly defined and permanent boundary – based on roads and footpath FP118. It also excludes the historic centre of the village and removes and protects important historical buildings and assets:
- St Lawrence Church,
- Browns (a former residence of the Lord of the Manor),
- Browns Field which is used by the Rugby Club minis for sport and is also a field of historic importance,
- Dormers and Old Stanton on Church Street, two period and historically attractive houses
- Silver Jubilee Garden, the former village green – opposite the entrance to St Lawrence Church.

EPC sees this amended inset as a clearly defined and permanent boundary following roads and a footpath. It also protects a public amenity space (Silver Jubilee Garden on Church Street) and several historic buildings including St Lawrence Church.

The inset boundary proposed in the LP does not follow a clearly defined boundary. It goes straight through the centre of the Barnes Wallis Close development where there are no defined or permanent boundaries, and if this inset boundary were to be applied it would be likely to cause confusion in the future.

EPC attaches a map, herewith, that shows the amendments in detail.

Requested inset boundary change to the west of the village.

To the west EPC proposes the following change to the inset boundary. At the back of Middle Farm Place the inset follows the road edge in front of 37, 39 and 41 Middle Farm Place and then follows the back gardens of Wychelm, Lavender Hill and Woodstock on Orestan Lane. This removes Middle Farm Place field from the inset. This amended inset boundary provides a clear, defensible and permanent boundary.

In addition Middle Farm Place field is a public amenity space and should not be included in the inset. The map attached shows the requested amendment to the inset.

EPC request GBC to add a paragraph to page 122, Sites, that states that GBC will support, in principle, sites brought forward by Neighbourhood Plans.

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

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P2 Protecting Green Belt

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EPC propose this amendment as it follows a more clearly defined and permanent boundary -based on roads and footpath FP118. It also excludes the historic centre of the village and removes and protects important historical buildings and assets:

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- Browns (a former residence of the Lord of the Manor).
- Browns Field which is used by the Rugby Club minis for sport and is also a field of historic importance.
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The inset boundary proposed in the LP does not follow a clearly defined boundary. It goes straight through the centre of the Barnes Wallis Close development where there are no defined or permanent boundaries, and if this inset boundary were to be applied it would be likely to cause confusion in the future.

Requested inset boundary change to the west of the village. To the west EPC proposes the following change to the inset boundary. At the back of Middle Farm Place the inset follows the road edge in front of 37, 39 and 41 Middle Farm Place and then follows the back gardens of Wychelm, Lavender Hill and Woodstock on Orestan Lane. This removes Middle Farm Place field from the inset. This amended inset boundary provides a clear, defensible and permanent boundary.

In addition Middle Farm Place field is a public amenity space and should not be included in the inset. The map attached shows the requested amendment to the inset.

EPC request GBC to add a paragraph to page 122, Sites, that states that GBC will support, in principle, sites brought forward by Neighbourhood Plans.

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

Attached documents:
I strongly object to the latest addition to the local plan for Send Marsh/Burnt Common and Ripley development for the following reasons:

I have lived for many years in the lovely Green Belt area of Surrey and am extremely concerned that you could be considering taking any of the Green Belt area away.

The definition of Green Belt is that it is a policy for controlling unreasonable urban growth. It should be a part of the countryside that will be sacrosanct for the foreseeable future, maintaining an area where agriculture, forestry and outdoor leisure should prevail. The fundamental aim of green belt policy is to prevent urban spreading by keeping land permanently open and consequently the most important aspect of green belts is the openness.

According to the NPPF there are five purposes of including land within the green belt:
To check the unrestricted sprawl of large built up areas
To prevent neighbouring towns to merge with each other
To assist in safeguarding the countryside from encroachment
To preserve the setting and special character of historic towns
To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

It seems to me that if you remove the Green Belt label from all the local villages you have listed in your plans, this will give anyone ad hoc rights to build as and when they like. Once lost, green belt can never be got back.

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

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/17329</th>
<th>Respondent: 8579649 / Home Builders Federation (Mr James Stevens)</th>
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</table>

The green belt review is unsound because it is unjustified.

Generally the HBF is very supportive of the Council’s approach to the green belt and its review to accommodate the OAN in full. The Council’s approach is very positive and we consider that the Local Plan provides a benchmark of good practice for other authorities in Surrey to follow, including Woking and Waverley Councils. We note the insetting from the green belt of several villages to allow for some limited infilling if appropriate sites can be located. This reflects national planning policy (NPPF, paragraph 86). This approach is necessary to ensure that the Council’s windfall expectations will materialise in sufficient number and it will also help to enable the required number of affordable homes (Policy H2) and rural exception homes that are needed to come forward (Policy H3).

However, while we applaud the decision to undertake a detailed green belt review we are concerned that the review is not entirely comprehensible in places and that there may be additional sites available that could contribute towards the housing land supply. The rationale as to why land in some locations will be removed from the green belt and not in others is not altogether clear.

We understand the rationale for the release of land around some of the settlements. These are sustainable locations for growth especially as some like Guildford and Normandy benefit from train connections which could help to reduce private car use. The concentration of housing development around transport hubs reflects emerging Government policy (Consultation on proposed changes to national planning policy, DCLG 2015). However, given this emphasis in national policy on existing settlements, it is unclear why some of the green belt options around the settlements were rejected when
in terms of their contribution to the purposes of the green belt they appeared to perform no better than some of the selected sites.

We have noted the Volume 1 and 2 Green Belt studies. We note that the table showing the Achieving the Purposes of the Green Belt Designation scoring exercise in Volume 2 shows that some land parcels around Guildford have scored quite low (there are some 0s and 1s). It is unclear why these sites have been discounted in favour of the allocated sites.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/7611</th>
<th>Respondent: 8580065 / Surreyheath borough council (Jane Ireland)</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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</tbody>
</table>

In addition Surrey Heath Borough Council is concerned that no other land designation appears to be given to the areas to be removed from the Green Belt. The sites are described as major previously developed sites inset from the Green Belt in Paragraph 4.3.15 of the Submission Local Plan. This leaves the status of these sites quite unclear with no policy direction as to how they could be developed in the future. Pirbright is a large site and sits immediately adjacent to the Council’s strategic housing site at Deepcut. Keogh Barracks abuts Surrey Heath.

In light of the above concern, Surrey Heath **objects** to the Local Plan as currently drafted.

The Council would welcome the opportunity to engage with Guildford via the duty to co-operate processes with a view to resolving these concerns and thus facilitating sound and effective plan making.

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

Attached documents:

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<th>Comment ID: PSLPP16/18721</th>
<th>Respondent: 8581089 / Jenny Wicks</th>
<th>Agent:</th>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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</tr>
</tbody>
</table>

Policy P2

I object to this policy.

I do not consider that it gives the protection to the Green Belt intended by the NPPF. When 65% of the new development is proposed to be on land in the Green Belt it is not credible to claim that this is justified by ‘exceptional circumstances, not including housing need alone.’ No exceptional circumstances are specified.

The introductory text for this policy asserts it is required that exceptional circumstances should exist to promote sustainable patterns of development, whilst in truth the proposed new settlements at both Wisley and Gosden Hill would be dormitory settlements largely dependent on the car. Neither of these locations is near to where jobs growth has been in recent years, which is largely to the west of the Borough.

The Green Belt and Countryside Study which underlies this policy is a flawed document which rests on subjective judgements and not precise scientific evidence. The rating of areas depends on which boundaries you choose to give to the plots under consideration alter the boundary even slightly and you can get a different assessment. The scale used in
the assessment process is small, so that small differences in judgement can have a radical impact on the final assessment. A scale from 1-10 would have had much more sensitive results.

I consider that each of the Green Belt sites should be assessed individually for whether there are exceptional circumstances to justify their removal from the Green Belt.

I think the statement in 4.3.17 that the 'the general extent of the Green Belt has been retained' is highly misleading. In my ward the proposed development of Gosden Hill Farm (78 hectares) for 2,000+ houses and other development removes a very large area of Green Belt. Within a few hundred yards of the ward boundary the building of 400 houses plus an industrial estate at Garlick’s arch (34.5 hectares) and the development of 2,000+ houses at Former Wisley Airfield (93 hectares), together with sites for 600 houses in the Horsleys (30 hectares), means a very large (235 hectares), and completely disproportionate, loss of Green Belt in this part of the Borough. All this development and loss of Green Belt is near the A3, the length of which is only six miles from Burpham to Wisley.

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

Attached documents:

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Comment ID: PSLPP16/17552  Respondent: 8581505 / Burpham Neighbourhood Forum (Jim Allen)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

Policy 9. Protecting Green Belt land

...The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. …

We are concerned that any change to the current 1940’s Green Belt line destroys its very purpose and refer to GBC High Court Action to successfully remove this site from the South East Plan. See extract from item 11, 18th June 2009

The Plan wording is weak:

Extensions and alterations:
Should have a specific sizing as the word ‘disproportionate’ could mean anything.

Replacement buildings:
Should only be within the footprint of the original building.

Limited infilling
Should only be within the building line of the nearest adjacent existing properties within the development line confines of the village.

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

Attached documents:

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Comment ID: pslp171/2185  Respondent: 8581505 / Burpham Neighbourhood Forum (Jim Allen)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
4.3.17 Page 5.54 Policy Green Belt

[Maps]

The statement 4.3.17 seems irregular and counter intuitive in that while Green Belt has been introduced ‘to prevent coalescence’ between Ash Green village, Ash and Tongham [the Executive Council leaders own patch!], this protection has been removed along the A3. The A25 Gosden Hill site [formerly C1/C2 plus extension into C3 north] has been extended outwards from the urban boundary, while Burnt Common has been removed from the Green Belt adjacent to Send, meaning Send is coalescing with the urban boundary of Guildford [A section of the Council political opposition’s ‘patch’] forming a ribbon development along the A3, something which the Green Belt designation is meant to prevent.

Noting in the Green Belt study of 2014, site B8 is considered highly sensitivity yet C1, C2 and C3 (owned by a developer) are not, when in fact C1, C2, B6 and B7 should have been given the same weighting in this study as D1. It would be rational to conclude that this assessment was based on the commercial confidentiality of the land owner’s intentions, as opposed to the public interest assessment of the genuine purpose of the Green Belt as supported by the Council’s previous actions in:

- 1949: Tree Preservation Order on boundary of development line and the old and original Green Belt line.
- 1984: Refusal for inclusion in Local Plan of that time.
- 2003: Local Plan the site was not included for residential or commercial development.
- 2011: South East Plan High Court decision to exclude this site from the Local Plan.

The only differences between sites D1 and C1,C2,C3 are that they are separated by a railway line and D is owned by the National Trust and ‘Cs’ are owned by a property developer.

Nowhere in any legislation is the “defensible Green Belt line” permitted to be designated or defined by the land ownership.

[Planning Practice Guidance issued by Government in March 2014 aims to make clear that unmet housing needs (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the "very special circumstances” justifying inappropriate development on a site within the Green Belt]

4.3.20

This document under Regulation 19 is meant to be ‘the completed Local Plan’ yet in this paragraph it clearly states the ‘forthcoming’ Green Belt Supplementary Planning Document. This is yet another document referred to in this Plan which actually doesn’t exist in this time frame [up until 24th July 2017] and thus cannot be assessed by the public.

4.3.24

As villages have now been proposed to be inset in the Green Belt does this statement refer to ‘inset’ or ‘washed over’ habitation?

Key Evidence page 58

Refers to the Green Belt and Countryside Study; this is flawed evidence as identified in previous public consultations since 2014.

Maps displays inset villages within the green belt while the ‘principle’ of inset is sound the boundary lines are not for example Ash Green boundary instead of following the tree line a ‘defensible line’ as required by the NPPF/ NPPG, it chops through an area of woodland with no strong defensible line thus it fails this requirement “define boundaries clearly, using physical features that are readily recognisable and likely to be permanent”

Page 24 fails to identify Local Green spaces, Ancient woodland and Suitable alternative local green spaces,
Page 61 paints an imaginary line through the middle of the Ripley Green far more rational to follow garden line, it appears the amendment 2 actually includes the north side of the high street for no benefit to the Green Belt or to Insetting – this line should be agreed with each parish ...

Page 82 has an identified settlement boundary with ‘numerous’ residential properties outside the boundary suggesting irrational thought patterns
Page 84 also has a strange delineation between countryside Green belt and inset village suggesting these areas are
strategic employment sites with no strategic highway access and introducing business premises into a residential area without logical or rational reasoning of boundary delineation.

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

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

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**Comment ID:** PSLPP16/13954  **Respondent:** 8581601 / Mr. James Winborn  **Agent:***

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

We are also very concerned at the proposed encroachment on the Green Belt. The Green Belt is there to guarantee areas of countryside adjacent to London and to take villages in the Bough out of the Green Belt would seem drastic action to take to allow the development of new homes. Surely additional consideration should be given to making further use of brownfield sites in Guildford and elsewhere which together with infilling and limited local development could provide a satisfactory way forward without a significant impact on the Green Belt.

To remove areas from the Green Belt ‘exceptional circumstances’ need to be demonstrated but such circumstances have not been set out in the Plan particularly with regard to East and West Horsley.

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

Attached documents:

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**Comment ID:** pslp171/513  **Respondent:** 8581729 / Jeffrey Gargan  **Agent:***

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

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

Green Belt, Policy 2 at paragraph 4.3.15

*Send Business Park now taken out of the Green Belt altogether*

I object to the proposal to inset Send Business Park from the Green Belt because:

1. It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation
2. There is highly restricted vehicular access along Tannery Lane in both directions
3. Further expansion or development at this location detracts from the openness
4. of the Green Belt and is inappropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.
To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national

<table>
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<th>Comment ID: PSLPP16/13490</th>
<th>Respondent: 8582977 / Guildford Environment Forum (John Bannister)</th>
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**POLICY P2**

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This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national
guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.
Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

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

Attached documents:

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<th>Comment ID: PSLPP16/15523</th>
<th>Respondent: 8585601 / Jennie Kyte</th>
<th>Agent:</th>
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**Policy P2: Green Belt**

**Policy P2 Box:** The policy box ignores the Green Belt as a constraint as set out in NPPF policy, paragraph 14 and footnote 9.

It does not mention how the Green Belt is protected from boundary changes under Exceptional Circumstances during the Local Plan process and that it normally should only be changed for a rare or specific purpose, with care being taken not to infringe the principle of permanence of the Green Belt as set out in NPFF policy, paragraph 79. It does not give the five purposes of the Green Belt set out in NPPF policy, para 80, any one of which serves as a reason for the Green Belt. Releasing Green Belt to fund infrastructure does not constitute ‘Exceptional Circumstances’.

The protection given to the Green Belt in these policies has been ignored as there seems to an interpretation that because Exceptional Circumstances can apply to a local situation that a Local Authority can take as much Green Belt as it wants through boundary changes, thereby destroying the permanence principle of the Green Belt and the true meaning of Exceptional Circumstances.

**4.3.11 to 4.3.23:** There is no mention of the Green Belt as a constraint in these accompanying paragraphs

**4.3.11:** This paragraph does not mention the five purposes of the Green Belt as set out in NPPF policy, paragraph 80.

**4.3.16:** In this paragraph it is stated: ‘We consider that exceptional circumstances”
exist to justify the amendment of Green Belt boundaries in order to facilitate the development that is needed and promote sustainable patterns of development.” No justification is given for this statement and the Sustainability Appraisal does not reach any conclusion as to whether this is sustainable. It states in para. 10.19.2: “It is not possible to conclude on whether or not the draft plan is sustainable”

4.3.17: The words in this paragraph “Whilst the general extent of the Green Belt has been retained” is misleading as with the removal of villages from the Green Belt, 6% of the Green Belt has been removed, rather than the 1.9% repeatedly given by the Council in public statements.

4.3.12, 4.3.17 and 4.3.19: Such an enormous change as changing the boundaries of the Green Belt and insetting 14 villages from the Green Belt should not just be casually referred to in accompanying paragraphs to the policy box, but highlighted with a suitable heading or headings. This part of the policy of the Green Belt of insetting needs to be transparent and justified.

This change will have a huge impact on village and landscape scenery, and ignores the NPPF’s purposes of the Green Belt in para.80. Villages instead of being washed over by the Green Belt and protected will be susceptible to developments of large blocks of housing; to sprawl and to joining up with other developments. To give a few examples, Shamley village is extremely close to Guildford and Bramley in neighbouring Waverly District. Effingham is in danger of merging with Little Bookham and East Horsley. Flexford/Normandy and the Horsleys will be transformed from rural environments and susceptible to sprawl, etc. (Just a few large executive houses, favoured by developers, on the entry to a village or on a space within the village, could ruin its entire character and the visual landscape of the countryside surrounding it.).

Opposition to this change has been huge and yet the NPPF’s intention of “empowering local people to shape their surroundings” has been ignored.

Guildford has an ancient Parish heritage presiding over a network of villages linked by footpaths and country lanes, which follow the ancient field lay-out. This has been preserved in spite of Surrey (and Guildford District in particular) being the most
populated county in England and in the top three of the most populated areas in Europe. The Green Belt in Guildford Borough is heavily populated with villages, the villages being set so close together that it is easy to walk through countryside from village to village. (A third of the borough’s residents live in rural areas.) The strongest protection possible is needed to protect the outstanding landscape of this ancient heritage and to prevent the whole area with its scenic and narrow lanes from being destroyed by traffic.

The Green Belt and its villages provide views into and out of the AONB and development will encroach on these views and bring light pollution to night skies.

The landscape value of the Green Belt as a whole should be recognised. The Local Plan should strongly protect this heritage with Green Belt policies for future generations and for those living in London.

Para. 4.3.15: This paragraph lists major previously developed sites which in addition to the villages to be inset, further encroaches into the Green Belt. Two nationally important areas of AONB are included.

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

Attached documents:

Comment ID: PSLPP16/6621  Respondent: 8585697 / Laurence Edwards  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Green Belt and Limited Infilling The coalescence between the urban area of Guildford and the surrounding villages and also Guildford with the surrounding boroughs should be strenuously resisted. This policy should be expanded as per paragraph 80 of the NPPF

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

Attached documents:

Comment ID: PSLPP16/6956  Respondent: 8586017 / Leslie Brown  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Green Belt realignment which will take Send outside the settlement boundary when there are still brownfield sites available for development in urban areas which will have much less impact on local environment and infrastructure. It has never been made clear, to me at least, who this additional housing is for in an area which is primarily residential and not industrialised.
The number of homes proposed for Send (693 p.a.) is completely disproportionate in the context of a village like Send. The extensive development proposed for Send and elsewhere in this locality such as Garlick's Arch, Gosden Hill and Wisley Airfield means that, in effect, it will become a ribbon development from Guildford almost as far as Cobham and transform a pleasant rural area into suburbia.

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

Attached documents:

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Comment ID: PSLPP16/6440  Respondent: 8586369 / Mr Luigi Fort  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick's Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a 'special circumstance' and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

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

Attached documents:

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Comment ID: PSLPP16/12271  Respondent: 8586785 / Elizabeth Critchfield  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

We object to this policy. The Metropolitan Green Belt constitutes 89% of the Borough and should be at the heart of all planning concerns. It is not merely a space separating urban areas but a vibrant community in its own right – home to agriculture, tourism and leisure activities. It provides biodiversity, beauty, wide rural views – all essential for physical and psychological wellbeing. It plays a vital rôle in water management and flood control. And it is not the personal fiefdom of Guildford Borough Council but belongs to the wider community, including London, and should be regarded as a national asset and a legacy for the future. Once the Green Belt is lost it is lost in perpetuity.

It is reasonable to expect some development but it should be proportional; a village that has 1% of the total number of homes in the Borough should not be expected to accommodate more than 1% of new homes. The demands on infrastructure would also be proportional, and settlements would be more likely to retain their character.

Policy P2 seeks to impose strategic development in the Green Belt, despite government commitments to protect it.
The NPPF states

“…..the essential characteristics of Green Belts are their openness and their permanence…….new Green Belts should only be established in exceptional circumstances."

Brandon Lewis, the then Minister of State, said

“[the NPPF]… makes it clear that inappropriate development may be allowed only where very special circumstances exist and that Green Belt boundaries should be adjusted only in exceptional circumstances through the Local plan process and with the support of local people. We have repeatedly made clear that demand for housing alone will not change Green Belt boundaries.”

This Local Plan proposes covering large areas of the Green belt with housing estates – 8,086 homes are planned as opposed to 1,135 for the urban area of Guildford, a huge imbalance.

Urban regeneration, the use of brownfield sites, homes in the town centre rather than the proposed 40% increase in retail space that flies in the face of retailing trends, more student accommodation on campus – these should be utilised before summarily dumping blocks of housing onto a precious resource.

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

Attached documents:

Comment ID: PSLPP16/15167  Respondent: 8586785 / Elizabeth Critchfield  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

Green Belt

The Green belt is not entirely sacrosanct. There is no reason to object to some development, so long as it is proportional and appropriate. What GBC is proposing however is scandalous. More than half the planned total build is scheduled for the Green Belt – have GBC forgotten the purpose of the Metropolitan Green Belt? It was put in place to prevent urban sprawl, not provide a playground for developers. It is farmland, open space, manages water and flood control, is an area of biodiversity, and a provider of tourism and leisure activities. In the words of the NPPF, “… the essential characteristics of Green belts are their openness and their permanence.”

The Green Belt is a national asset and should be held in trust for future generations. Once lost, it cannot be regained.

Why does urban regeneration not play a greater role in this Plan? Prioritising development of brownfield sites, locating more student accommodation on campus, reducing the proposed 40% increase in retail space would take the pressure of the Green Belt.

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

Attached documents:

Comment ID: PSLPP16/5258  Respondent: 8586817 / Mr J Lawes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I have resided in Send since 1980 moving to the area from a busy area where houses were being built on every piece on available land, I picked Send / Ripley as I was certain that it would remain within the Greenbelt.

I OBJECT

To Send loosing its Green Belt status, I have received no notification from any planning authorities that these changes were coming, I only heard from neighbours. Local councillors promised that this area would remain "GREEN" but have now have reneged on their promises. Send would lose its identity completely and end up like Woking and other similar sprawling towns. Greedy developers would soon move in and do what they want and make vast profits at our expense, I have already met one who has bought land in Send two years ago off main by river, on spec based on "inside knowledge" that the Green belt will be destroyed.

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

Attached documents:

Comment ID: PSLPP16/8571  Respondent: 8586977 / Ms Loraine Austin   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

I write to object most strongly to the proposals to build on Guildford’s greenbelt land. Past Governments made the policy of greenbelt to protect it for the country, the people and the wildlife and for new Governments to erase these policies makes the making of any policy a farce if, in time, it can be overwritten.

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

Attached documents:

Comment ID: PSLPP16/8575  Respondent: 8586977 / Ms Loraine Austin   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

* It is Surrey County Council policy (March 2013) by a Motion agreed at a Full Council meeting of Surrey County Council about the Green Belt:

Surrey County Council, March 2013
RESOLVED (unanimously):

Council notes:

1. Surrey County Council has a proud history as the creator of the Green Belt. The County’s Countryside Estate founded by the Surrey County Council Act of 1931 was the basis of the London County Council’s Green Belt Act of 1938.

2. The Coalition Agreement states:

‘We will maintain the Green Belt, Sites of Special Scientific Interest (SSSIs) and other environmental protections, and create a new designation – similar to SSSIs –to protect green areas of particular importance to local communities.’

Council believes:
Surrey’s Green Belt, Countryside Estate, SSSIs and other green spaces are vital, not only for the county’s environment but also for maintaining a “green lung” around London.

Council resolves:
1. To use its power to protect Surrey’s Green Belt.
2. To support the National Planning Policy Framework (section 9 – paragraphs 79 to 92) and the Government’s policy of protecting the Green Belt.
3. To make Surrey’s MPs and the County’s Districts and Boroughs aware of this resolution.
4. That any Green Belt development in the County is in line with the needs and wishes of Surrey residents.

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

Attached documents:

Comment ID: PSLPP16/1553  Respondent: 8587073 / Rushmoor Borough Council (Louise Piper)  Agent:

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

Policy P2 of the draft Local Plan relates to Green Belt. This notes that whilst some land has been removed from the Green Belt to facilitate residential development to meet identified housing needs, the Green Belt boundary has in fact been extended between Ash Green village and the Ash and Tongham urban area in order to prevent coalescence. Whilst not directly adjoining Rushmoor Borough, it is relevant to note and support this proposed addition to the Green Belt, given the supplementary protection it offers to the green infrastructure surrounding Ash and Tongham in the longer term, once the permissions and allocations for this part of Guildford Borough are built out over the period to 2033.

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

Attached documents:

Comment ID: PSLPP16/1014  Respondent: 8587105 / Linda Parker-Picken  Agent:

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

I object to all proposed development of housing on the Green Belt. In particular, I object to the proposed housing on Tannery Lane Send, Send Hill and at Garlick’s Arch. Plus the insetting of the villages which would leave vast swathes of local countryside unprotected. Government policy deems that housing need alone does not constitute the extraordinary circumstances that are required to develop on Green Belt land; and our local MP, Sir Paul Beresford, has reiterated this point of view recently.

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

Attached documents:

Comment ID: PSLPP16/15089  Respondent: 8589953 / Michael R. Murphy  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to the Local Plan because it seeks to build on Green Belt land unnecessarily. The work of Professor Anne Power at the London School of Economics, amongst much other expert research, clearly demonstrates that there is more than sufficient land to build all the houses that are needed without taking any of the Green Belt. In our area several studies show that unused brownfield sites in Guildford Town itself are capable of yielding most of the required land. GBC has not properly explored the capacity which is available there or on brownfield sites elsewhere in the borough, which would have provided a sensible starting point since GBC own many of them.

I OBJECT to the Local Plan in that GBC’s approach to the Green Belt introduces a concept of grading its quality. This is an alien concept, not recognised in law. Of course some Green Belt is seen to be better than other Green Belt but the law does not make any distinction, nor should it. It depends who is looking at it and from what standpoint they are looking. Green Belt is Green Belt and it is not for GBC to stand in judgement on what bits it thinks are worth keeping and what are not.

I OBJECT to proponents of the plan representing those against it as “nimby’s”. Those against are not against building houses. They recognise the need for them. They are against building them in unsuitable, unthought out locations which damage existing amenities. This relates particularly to building them on Green Belt land, thereby destroying an existing amenity, when it is not necessary to do so.

I OBJECT to the Local Plan because it seeks to promote sites for houses with woefully inadequate attention being paid to the infrastructure to support those sites. Without proper infrastructure none of the identified sites will deliver what is claimed for them. No detailed thought has been given to the form of the infrastructure required, still less to how much it would cost and, it would appear, none at all to where the money for it would come from.

I OBJECT to removing Send and other villages from the Green Belt. The Green Belt was intended to be permanent, and its permanence was enshrined in law through the National Planning Policy Framework, reinforced by the NPPG and a succession of Ministerial guidance statements. For all of this to be overridden requires “special circumstances” which do not exist in the case of Send.

I OBJECT to all four proposed sites in Send because they are all in the Green Belt and not one of them displays the very special circumstances which would be needed in order to outweigh the substantial harm caused by reason of inappropriateness. There is abundant legal authority but I would cite the Court of Appeal cases of City of St Albans v Hustin Properties and Gallagher Homes v Solihull Metropolitan Council. These precedents, which have been ignored by Guildford Council before, show that it is necessary to demonstrate that harm to the community at large, by taking the Green Belt, would be less than if it was not taken. The crucial words are “to the community at large”. Paragraph 47(1) of the NPPF advises local authorities “to ensure that their local plans meet the full, objectively obsessed, needs for markets and affordable housing in the housing market area as far as is consistent with the policies set out in this framework”. As the Court of Appeal has made clear one cannot rely on objectively assessed needs without having regard to the policy constraints. The qualification in this clause “as far as is consistent with” is not qualifying housing need; it is qualifying the extent to which the local plan should go to meet those needs. It is quite clear from the precedents that exceptional circumstances will not exist unless the potential harm to the Green Belt has been shown to be clearly outweighed by other considerations. In other words harm to the Green Belt is included in the factors which the NPPF requires to be taken into account.

The NPPF further states that in their local plans local authorities are required to meet objectively assessed housing needs “as far as is consistent with the policies set out in this Framework”. The policies referred to include Section 9 - Protection of the Green Belt. The Court of Appeal has clarified the interpretation of this by stating categorically that there may be nothing very special about a housing shortfall in an area which has very little undeveloped land outside the Green Belt.

The key question is not “is there a shortfall in housing land supply?” You have to ask “have special circumstances been demonstrated to outweigh the Green Belt objection?” And such circumstances are not demonstrated simply because there is a less than five year supply of housing land. Special circumstances will not exist unless the potential harm to the Green Belt is clearly outweighed by other considerations. The draft plan has not begun to demonstrate that there are exceptional circumstances and indeed offers very little to suggest that the authors have even read what the Court of Appeal has said about the provisions in the NPPF.
It is noted that the Court of Appeal precedents have been ignored before by GBC, which appears to regard itself as over and above the law. GBC seems willing to expend residents’ funds on counsel’s advice, in support of what its client developers want to do, but cannot bring itself to get a QC’s opinion in order to guide it on understanding the case law that actually exists, which manifestly it does not understand.

Given the large amount of Green Belt in Guildford Borough, the council can legitimately argue that it does not have to match the housing targets of boroughs with less Green Belt. But if Guildford wants to match the housing target which would apply if it was not constrained by the Green Belt, it can still do so using brownfield land which is in plentiful supply. It is difficult to avoid the conclusion that it has not taken either of these legitimate routes because it finds the allure of developers’ propositions on green field sites more attractive. GBC should also note that the Green Belt was created not just for the benefit of local residents. It came to be known as the Metropolitan Green Belt because it was intended to be of benefit to a much wider range of people, especially Londoners visiting open spaces outside but near to London. It is beyond the remit of GBC to arrogate to itself the power to override Parliament’s intention.

I OBJECT to any sort of diminution of Send’s Green Belt because it provides an essential buffer stopping Woking and Guildford becoming one conurbation. It has served this purpose effectively since its inception and should continue doing so for the benefit of subsequent generations living here. No group of councillors, especially without a mandate, has the authority to impose a different future on residents.

I OBJECT to any reduction in Send’s Green Belt because so much land in Send provides the setting for the beautiful Wey Navigation corridor, which is a conservation area that enhances biodiversity, is visually important, provides a valuable leisure facility and combined with the surrounding lakes an exceptional habitat for a wide range of bird species and other wildlife.

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

**Attached documents:**

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<thead>
<tr>
<th>Comment ID: pslp171/1882</th>
<th>Respondent: 8589953 / Michael R. Murphy</th>
<th>Agent:</th>
</tr>
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<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
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<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
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</tbody>
</table>

I OBJECT TO THE PROPOSAL TO INSET SEND BUSINESS PARK FROM THE GREEN BELT BECAUSE:

Further expansion of development of this location detracts from the intended openness of our Precious GREEN BELT, and is totally inappropriate.

It is a an Old Non Conformer user in an area of outstandingly beautiful countryside adjacent to the lovely River Wey Navigation Canal.

Tannery lane is a twisty narrow country lane with very restricted vehicle use in both directions.

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

**Attached documents:**

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<thead>
<tr>
<th>Comment ID: PSLPP16/6407</th>
<th>Respondent: 8590753 / Mr Michael Anning</th>
<th>Agent:</th>
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<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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<td></td>
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</tr>
</tbody>
</table>
I OBJECT to all insetting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley.

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

Attached documents:

Comment ID: PSLPP16/13057  Respondent: 8591169 / Michael Bruton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

I wish to submit objections to the Local Plan in addition to those in my email below.

I have now read the submission on behalf of CPRE Surrey (Guildford Branch) by Mr Tim Harrold – dated 15 July 2016. I am a member of CPRE Surrey and a past CPRE County Chairman for CPRE Cornwall. I support wholly Mr Harrold’s 29 page submission and the objections therein. I would like to bring to your attention in particular the statement on the Green Belt by the Housing Minister, Brandon Lewis of 7/6/16 as replicated (p 28) in the CPRE Guildford Branch submission.

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

Attached documents:

Comment ID: PSLPP16/13790  Respondent: 8591169 / Michael Bruton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

POLICY P2

1. I object to all Green Belt sites allocated in the local plan. GBC has had calculated housing numbers on a formula withheld from the public and indeed from the Councillors who have voted in support of the draft Plan. To vote on any Plan based on an unexplained formula must make any such proposals non credible.

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

Attached documents:

Comment ID: PSLPP16/13792  Respondent: 8591169 / Michael Bruton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

POLICY P2

1. No explanation of the ‘exceptional circumstances’ required to build housing on a Green Belt has been provided by the Council.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

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

Attached documents:

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

After the housing numbers have been revised downwards, the entire approach to planning in Guildford Borough ought also to shift. I have in the past publically called for a planning strategy which focuses more on higher rise development in the centre of Guildford itself if in doing so the historic very central portion of Guildford must be respected. Such developments have a number of advantages, they constitute a far more effective use of land than new builds in rural Green Belt, they are far more likely to be well linked to existing infrastructure, they will be more energy efficient and perhaps most importantly I believe that such development would also be more in line with what future Guildford residents would be looking for in a place to live as opposed to smaller clusters of houses out in the Green Belt, further away from Guildford’s amenities and rail links.

The position or central government with regard to local planning and development on the Green Belt is clear. Residents have heard in the past comments to the effect of ‘it is the government in Westminster which is forcing us to do this ...’ This was not true then and it is not true now. I have met with Ministerial colleagues on multiple occasions and corresponded with the Department for Communities and Local Government at length on the questions of Local Planning and Green Belt policy. The Conservative Government is absolutely committed to Green Belt protection, I would urge the leadership and planners at Guildford Borough Council to closely study both the National Planning Policy Framework (NPPF) and the various Ministerial statements published on this topic. The only message one could draw from these needs re-emphasising. There is nothing in national policy which supports, encourages or condones any development on the Green Belt save for the most exceptional - and housing need is acknowledged as not falling into this category.

In addition to the Green Belt issue, I do not believe it is appropriate to propose developments in the green belt, dependant upon large and expensive road infrastructural developments. With the present economic outlook, especially with Brexit looming ahead these are most unlikely to be fulfilled. Whether we take the ill-conceived plans for thousands of houses at Gosden Farm in West Clandon, at Wisley or Garlick Arch there is a clear lack of foresight where the reliance on such suggested infrastructure will produce planning blight on surrounding areas. This statement is true in the context or not only roads but sewerage or local services such as hospitals and school places.

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

Attached documents:
### Comment ID: PSLPP16/25  **Respondent:** 8593185 / Niels Laub  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

I object to this policy. It does not mention the need for permanence of Green Belt boundaries (NPPF para 79) nor does it define the exceptional circumstances required to change Green Belt boundaries (NPPF para 83).

The GBC topic paper on housing claims that the decision by Bath & North East Somerset Council to build on the Green Belt justifies a change of Green Belt boundary in Guildford to allow domestic and other building. The scale of building proposed in the Green Belt at Guildford is vastly greater than at Bath and the strategic sites in Guildford can hardly be described as “highly sustainable”.

The analysis of Green Belt in pages 52 and 53 is wholly inadequate as a basis for review of Metropolitan Green Belt around Guildford. A far more strategic assessment is required, especially given the recent letter from the Planning Minister that “unmet housing need alone” is unlikely to justify housing development in Green Belt.

The Green Belt and Countryside Study remains deeply flawed for the following reasons and should be withdrawn:

- Not based on an overall strategy view of how the borough should develop. It is piecemeal in approach.
- Unacceptable definition of sustainability – it is used simply to mean proximity to facilities
- Does not recognise the “very special circumstances” required for Green Belt development or the even stronger protection for the AONB.

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

**Attached documents:**

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### Comment ID: pslp171/1354  **Respondent:** 8593537 / Normandy Parish Council (Leslie GA Clarke)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

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

4. Green Belt boundary changes

We are pleased to see the reversion of the Green Belt boundaries to more or less their existing levels (with the exception of 'insetting': see below) as a consequence of the withdrawal of the previously proposed strategic sites (A46 and A47), and welcome the protection this offers for our precious countryside. In particular we welcome and support the acknowledgement that the land lying between Normandy and Flexford (the previous site A46) is particularly sensitive in Green Belt terms as it contributes significantly to the openness' of the Green Belt in this area, as well as being of high grade agriculturally and therefore of importance in terms of the rural economy.

However, the Parish Council objects to the 'insetting' in the Green Belt of the three most settled areas of Normandy and Flexford on two counts. First, no case has been made on the grounds of 'exceptional circumstances' for removing this land from the Green Belt, and by so doing GBC will make it easier for further attrition of the Green Belt to take place in future as a result of extensions to the settlement area on adjacent Green Belt land (see para 6 below). Second, all three settlements contribute to the openness of the Green Belt and should therefore remain 'washed over' by it. This view has been supported by Planning Inspectors, who have indicated while rejecting recent appeal decisions that the land at Flexford and Normandy contributes to the openness of the Green Belt. 'Insetting' will make it much harder to sustain this crucial openness in future.

7. At a previous planning appeal the Inspector stated that the land at Palm House Nurseries contributes to the openness of the Green Belt and because of this the Parish Council feels strongly that it should remain 'washed over'. We understand that Travellers already own the adjacent land; if their existing site is 'inset' we fear there will be an attempt to enlarge the site onto this land even though it remains in the Green Belt (see comments above in para 3). The same arguments apply to
the Travelling Showpeople site at Whittles Drive. Both sites are rated "High Sensitivity" in the Sustainability Appraisal 2017 (Table 10.1) and in the Parish Council's view this flies in the face of allowing them to be 'inset' from the Green Belt.

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

Attached documents:

| Comment ID: pslp171/2577 | Respondent: 8593537 / Normandy Parish Council (Leslie GA Clarke) | Agent: |
|--------------------------|---------------------------------------------------------------|
| Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2 | Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |

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However, the Parish Council objects to the ‘insetting’ in the Green Belt of the three most settled areas of Normandy and Flexford on two counts. First, no case has been made on the grounds of ‘exceptional circumstances’ for removing this land from the Green Belt, and by so doing GBC will make it easier for further attrition of the Green Belt to take place in future as a result of extensions to the settlement area on adjacent Green Belt land (see para 6 below). Second, all three settlements contribute to the openness of the Green Belt and should therefore remain ‘washed over’ by it. This view has been supported by Planning Inspectors, who have indicated while rejecting recent appeal decisions that the land at Flexford and Normandy contributes to the openness of the Green Belt. ‘Insetting’ will make it much harder to sustain this crucial openness in future.

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

Attached documents:

| Comment ID: PSLPP16/12103 | Respondent: 8594177 / Michael Conoley Associates (Michael Conoley) | Agent: |
|----------------------------|---------------------------------------------------------------|
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 | Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |

Policy P2: Green Belt

It is agreed that the forthcoming Green Belt Supplementary Planning Document (SPD) should set out guidelines on the scale of development that this likely to be considered appropriate and how this is calculated. This will help provide greater clarity to applicants wishing to extend their homes although the figures should still be considered in relation to other design criteria.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17633</th>
<th>Respondent: 8595233 / Partners of Loseley Park (Michael More-Molyneux)</th>
<th>Agent: Strutt &amp; Parker LLP (Rachel Patch)</th>
</tr>
</thead>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? (Yes), is Sound? (Yes), is Legally Compliant? (Yes)

We support the broad thrust of this policy, which seeks to reflect the wording of national Green Belt policy contained within the NPPF, whilst it is acknowledged land will need to be taken out of the Green Belt to accommodate growth. Buildings on the Loseley Estate are in active use for a variety of purposes, including residential and business uses. Extension or alteration and replacement of buildings in the Green Belt is a normal part of the lifecycle of buildings and re-use of existing buildings is in line with the principles of sustainability, and should be welcomed. We also support the limited infilling of previously developed sites allowed by policy.

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

Attached documents:

Comment ID: PSLPP16/5638  Respondent: 8595905 / Mrs Jane Whatley  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

I object in the strongest possible way to the plans of the Council to build in the Green Belt. This specially protected land is meant to preserve our beautiful countryside and give a quality of life to those who live here. I cannot see any reason why the council would feel it necessary to change this glorious area in which we live irreversibly, and cannot understand what right they have to contravene the central government's commitment to the protection of Green Belt land and remove the rights of our descendants. The whole reason this country is so attractive is the division between discrete villages and towns; take away the right to preserve this and Southampton will eventually join seamlessly to Manchester. You do not have the moral right to remove the countryside from future generations, and you were elected on the promise that the Green Belt would be protected. What was the price of your promise?

I object to the plan to remove villages from the Green Belt. There can be no justification for this other than to increase the places it is possible to build. Whether the argument is for housing or disguised as for industrial use, all plans to build what are effectively unwanted industrial sites simply allow later change of use, so should be viewed as extremely circumspect. Where is the evidence that so much industrial space is required in a small village, and surrounding roads will be unable to cope with the resulting traffic.

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

Attached documents:

Comment ID: pslp171/1368  Respondent: 8595905 / Mrs Jane Whatley  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

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

I object to the plan to take Send Business Park out of the Green Belt (Policy 2 paragraph 4.3.15) because this is such a narrow lane. In the winter, when the pedestrian path becomes unpleasant to use, and walkers must use the roadway it is a dangerous experience to walk along it presently. I am sure that there is no valid reason to make this road any busier by permitting further expansion at this site.

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

Attached documents:
Policy P2

I object to the proposal that Send be removed from the Green Belt. Send provides a buffer between Woking and Guildford. If the vulnerable areas proposed are to be included within the village boundaries and removed from the green belt, (the land behind St Bedes and along the Wey navigation) one assumes that there will be a presumption for building on those sites in the future.

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

Attached documents:

Policy P2

I object to the changes to Policy P2 because they have not addressed many of the very large number of comments made to the 2016 plan.

I object to the new para (1) “The Metropolitan Green Belt will continue to be protected as shown designated on the Policies Map, against inappropriate development. In accordance with national planning policy, the
construction of new development will be considered inappropriate and will not be permitted unless very special circumstances can be demonstrated.” The words “as shown designated on the Policies Map” should be deleted. The Policies Map has effectively ignored huge areas of Green Belt protection and the new para (1) is therefore a mess.. I am aware that many others including myself made this point in previous responses to consultation. I can only conclude that the Borough have no ‘very special circumstances’ to demonstrate as they have failed to address this.

I object to the proposed change that Normandy settlement, Flexford settlement and Walden Cottages should be inset from the Green Belt due to the fact that:

There is evidence in past planning appeals APP/Y3615/W/15/3002308, APP/Y3615/A/10/2140630 and APP/Y3615/A/10/2131590 that the land here contributes to the “openness” of the Green Belt.

There is evidence in the Sustainability Appraisal para 10.4.7 that the agricultural land between the settlements is of BMV (Grade 3a farmland) quality, exhibits ‘openness’ and contributes to the rural economy.

The land in and around the settlements of Normandy and Flexford contributes to views into and from the Surrey Hills AONB (Hog’s Back)*

Policy P2 also fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it needs to be permanently protected. The Green Belt is intended to check the unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and other urban land. The land around Normandy Flexford, Christmas Pie, Wyke, Pinefields and Willey Green consists presently of a series of Hamlets washed over by the greenbelt and providing the greenbelt space preventing urban sprawl between Aldershot and Ash (which is a development area) and Guildford.

Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. In my area farmland is used for cattle other livestock cereal and rape and corn.

It is incorrect to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of land that may be removed from the Green Belt.

I object to the statement in the submission Local Plan under Green Belt Policy P2 (4.3.13) which claims that Normandy, Flexford and a further list of 12 villages are “now inset from the Green Belt”. This statement is untrue as GBC is proposing to “inset” these villages. No decision has been made by an Inspector, therefore the villages remain in the Green Belt.

I object to the changed “insetting” of 15 villages from the Green Belt, and at “infilling” 12 of the borough’s Green Belt villages.

I am concerned that settlement boundaries are to be hugely extended in many villages and that infilling is also proposed outside the settlement boundaries of 11 further villages. This is completely unplanned and unmeasured development outside the OAN:

Many Guildford villages are elongated in outline, reflecting the effect of ribbon development (often along just one side of existing roads) permitted between the Wars. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored.

Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development.

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

Attached documents:
To remove land from the Green Belt, effectively re-drawing the Green Belt boundary, the council must again provide evidence of “exceptional circumstances” as required by NPPF para. 89. The council has provided no such evidence in the proposed submission documents. I am aware that many others including myself made this point in previous responses to consultation. I can only conclude that the Borough have no ‘very special circumstances’ to demonstrate.

Although I welcome the Borough’s decision to remove the proposed sites of development at A46 and A47 from proposals for development, the first because it was accepted to be Grade 3a farmland and the second for reasons to include that it is an area of SNCI ………my objections to the re designation of Greenbelt land to include insetting in respect of all of the policies in the administrative area of Normandy Parish Council, have not been accepted but they are nevertheless set out again set out above.

I object most strongly to the proposals to inset.

The Borough has no real policy proposals to limit the height and type of construction in the inset areas. We have seen some poorly made decisions recently of properties being built with high roof levels and inappropriate density.

* It is very important to remember that the views from the Hogs Back (ANOB) northwards are uninterrupted to a large degree because most of the property in Flexford is of low roof height and the street lighting is minimal. The openness of the countryside and the trees in ancient woodland act as an effective screen of the existing buildings.

Indeed the views remain uninterrupted to Ash Ranges which has SSSI and TBH status..other land between the ANOB and Ash Ranges has SNCI status and yet the insetting will result, if approved, infilling to the point that these protected spaces which adjoin them will be harmed for proximity.

These areas are also of huge historical importance and contain 22 Grade 11 listed buildings in their context of open farmland. William Cobbett (Rural Rides) lived and died here.

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

Attached documents:
1) Green Belt (Policy P2)
The Green Belt is an extremely important asset not only to Guildford Borough but to all the counties surrounding London. It protects London from urban sprawl; it contributes to air quality; it absorbs rainfall into the ground; and it is the open space that millions of people enjoy for recreation within an hour of central London. It is protected now and needs to remain so.

The National Planning Policy Framework para 80 states that Green Belt serves five purposes
• to check the unrestricted sprawl of large built-up areas;
• to prevent neighbouring towns merging into one another;
• to assist in safeguarding the countryside from encroachment;
• to preserve the setting and special character of historic towns; and
• to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The Draft Local Plan (DLP) puts forward no rational case or justification for building on the Green Belt as it proposes. The National Planning Policy Framework (NPPF) states that the introduction of new Green Belt boundaries (and many are proposed in the DLP) requires the Local Authority to demonstrate that ‘exceptional circumstances’ exist to justify such proposals. Unmet housing need as such is NOT an exceptional circumstance. From my review of the Sites Listed in the DLP between pages on pages 122 to 126, 65% of the proposed housing is planned for land currently in the Green Belt. The NPPF and Government Ministerial statements have emphatically said that Housing need in itself is not an ‘exceptional circumstance’ for protected Green Belt land to being used. Clearly, the Green Belt has not been applied as a constraint. The need for a Local Authority to apply constraints is clearly stated in Government advice, planning policy guidance and the NPPF. Policy P2 is flawed as it fails to meet NPPF policies.

I object to the proposed removal of East and West Horsley from the Green Belt by insetting and in addition extending the 2003 Local Plan Settlement Area boundaries.

No exceptional circumstances exist or other justification is made for these proposals. The Green Belt & Countryside Study is flawed and the Key Evidence document ‘Guildford Borough Economic Strategy 2013-2031’ makes no case for locating large numbers of new homes in East and West Horsley. The number of new dwellings and density of housing proposed would be totally out

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

Attached documents:
Back to the Green Belt. The Conservatives have said that they would support the Green Belt and David Cameron made a point of this quite early on in this Parliament, so why is a Conservative Council riding roughshod over this policy? [Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature] the production of this dreadful plan gives me little confidence in the Council or the Conservatives.

I believe the Green Belt is the hub of the matter as everyone I talk to is in complete agreement. When I was in Guildford the other day I was looking at the High Street thinking what a great job they are doing with the relaying of the granite blocks to restore the very lovely and historic High Street. The Council are to be commended for taking this action. That I thought, is how they should approach looking after other important parts of the Borough and that includes the Green Belt. The High Street with its lovely buildings and clock would be completely ruined with a nice new smooth tarmac surface, quieter for cars to run on and easier for ladies to walk on. The country side would equally be ruined with more houses, wider roads, less trees etc etc. Preserve our countryside and wildlife for all to enjoy and for future generations.

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

Attached documents:

Comment ID: pslp171/2603  Respondent: 8597825 / Mr P J Colborne-Baber  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The changes to the plan appear go against the “Countryside Vision Strategy” adopted by the Borough Council and published in the Summer 2017 edition of “About Guildford”. The strategy talks of protecting the countryside, not insetting large areas from the Green Belt and building houses, traveller pitches and industrial sites on it. The strategy talks of aligning the countryside management with “national policy” - and national planning policy dictates that the Green Belt should be protected.

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

Attached documents:

Comment ID: PSLPP16/16098  Respondent: 8598561 / Sarah Belton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to both these developments as there was improper use of Regulation 18; no local consultation; that Garlick’s Arch is green belt land which includes an area of ancient woodland, and that alteration to the A3 junction at Burnt Common is not appropriate without holistic infrastructure review and consultation. I wrote to the Council to this effect before the Council meeting in which they were included.

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

Attached documents:

Comment ID: pslp171/1363  Respondent: 8598561 / Sarah Belton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
I object to the local plan as a whole, on grounds that much of the development encroaches into the green-belt; that the Borough has failed to provide sound evidence of need or exceptional circumstances for most of the development, and has failed to provide guaranteed and appropriate infrastructure improvement already needed without additional local development.

I object to removal or so called 'inset' from the Green-belt of Send and other villages in the Borough, or sections of land such as Send Business Park (Policy 2 at paragraph 4.3.15). This can only be done in exceptional circumstances according to law, for which none exist. Urban development is not an exceptional circumstance, and this practice is erosion of the green-belt by stealth. Any weakening or exceptions made to green belt protection will lead to its ultimate demise, and once it is gone there is no going back. All green belt land must be protected in its entirety in perpetuity as the law intended and stands today.

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

Attached documents:

Comment ID: pslp171/798  Respondent: 8598785 / Mr Roger Parslow  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the removing Send Business Park from the Green Belt (4.3.15).

- Send Business park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for its removal from the Green Belt, and indeed GBC have not even attempted one. Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.

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

Attached documents:

Comment ID: PSLPP16/10742  Respondent: 8599553 / Runnymede Borough Council (Richard Ford)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy P2 sets out the villages to be inset from the Green Belt and identifies them for limited infilling. However, the NPPF is different from the former PPG2, in that it no longer sets out that villages can be inset and identified for infilling only. The NPPF is concerned with whether a village is either in or out of the Green Belt, and not the type/level of development that may occur.

I hope that you find these comments helpful, but please let me know if any clarification is required.

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

Attached documents:

Comment ID: PSLPP16/1793  Respondent: 8601121 / Roger Collett  Agent:
I think this is an entirely sensible and sound policy in relation to the green belt.

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

I object to the proposals for Green Belt development.

I oppose all unjustified development of our precious Green Belt spaces.

The current government is encouraging development of the Green Belt, in particular “nibbling around the edges” and for very dubious reasons.

Guildford Borough Council’s proposed Local Plan includes redevelopment of every remaining green field site, with no thought for the future.

Guildford Borough Council should have policies which enable it to act as guardian of the area’s heritage and should not play into the hands of those who will indirectly or directly profit from destruction of that heritage.

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

Green Belt land should only be considered for development in Exceptional Circumstances.

The Metropolitan Green Belt was originally created, not just for the benefit of its own residents, but for the benefit of residents of the whole of the London Urban area as well as visitors from outside the area. As such, it should not be up to any individual Borough Council to remove any of the Green Belt for development as it benefits a much wider population than simply our own. We are merely the trustees of such land for use by others. This fact was clearly understood by GBC councillors at the time of the 2015 local elections, as suggested by their promises at the time.

The government has already given written guidance to suggest that Green Belt land should only be considered for development “in Exceptional Circumstances and after the use of brownfield urban sites has been fully explored”. However, this Submission Local Plan suggests building on Green Belt land before exploring all the opportunities to build on brownfield land. We therefore urge GBC to carefully reconsider this policy.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15588  
**Respondent:** 8601601 / Mr Roy Dyer  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

**.We object to any loss of the green belt**

There should be no building on green belt land as proposed in this plan. We do not believe that there are exceptional circumstances as required by the National Planning Policy, as there is sufficient non Green Belt land (including brown field sites) within the borough. The main aim of the Green Belt policy is to prevent urban sprawl. If these plans were to go ahead, then that is just what we are going to end with – an urban sprawl and the villages would lose their individual identity and just be part of a large suburbia.

1. **We object to the removal of Clandon, Wisley, Send and Ripley from the Green Belt**

This is totally unnecessary and we believe that this is the thin edge of the wedge. If the villages are removed, then there will be more pressure for building on the green belt land outside the villages, which we totally object to.

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

Attached documents:

Comment ID: PSLPP16/1172  
**Respondent:** 8601761 / Albury Parish Council (Roy Hogben)  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

As a direct response to GBC’s Draft Local Plan I would comment as follows:

1. I Object to all erosion of the Green Belt.
1. I Object to any “in-setting” of any villages from the Green Belt.

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

Attached documents:

Comment ID: PSLPP16/6363  
**Respondent:** 8601793 / Roy Proctor  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

I object to the proposal to inset the villages of East and West Horsley from the Green Belt. Nowhere in your documents do you produce evidence to support the existence of exceptional circumstances which would support this being carried out. All the objective evidence seems to derive from the need to release land for building development, and the study
carried out by your consultant is inconclusive, subjective, and fails to take adequate note of the fact that the original aims of the Green Belt are still met in the cases of villages like East and West Horsley. This requirement for development is again based on unsound population forecasts.

Similarly, the proposal to change the boundaries of the current settlements of East and West Horsley appears solely aimed at releasing land for development. The arguments for changing specific boundaries are in some cases contradictory, and in some cases fail to meet the test of identifying more sustainable boundaries than those currently defined. I therefore object to the proposal to change the boundaries of the settlements.

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

Attached documents:

Comment ID: PSLPP16/15250  Respondent: 8601793 / Roy Proctor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

I object to the proposal to inset the villages of East and West Horsley from the Green Belt. Nowhere in your documents do you produce evidence to support the existence of exceptional circumstances which would support this being carried out. All the objective evidence seems to derive from the need to release land for building development, and the study carried out by your consultant is inconclusive, subjective, and fails to take adequate note of the fact that the original aims of the Green Belt are still met in the cases of villages like East and West Horsley. This requirement for development is again based on unsound population forecasts.

Similarly, the proposal to change the boundaries of the current settlements of East and West Horsley appears solely aimed at releasing land for development. The arguments for changing specific boundaries are in some cases contradictory, and in some cases fail to meet the test of identifying more sustainable boundaries than those currently defined. I therefore object to the proposal to change the boundaries of the settlements.

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

Attached documents:

Comment ID: PSLPP16/11189  Respondent: 8602337 / Cross Group (Mr Colin Cross)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

Policy P2 - Green Belt

I strongly object to GBC considering building strategic new developments of 2,000+ houses in Green Belt. I object to Gosden Hill, Blackwell Farm and the former Wisley Airfield becoming new towns 'dumped' in the Green Belt for reasons of economy and convenience. I particularly object to the former Wisley Airfield being considered for a new town as this is right in the middle of a critical green belt area on the edge of London and totally unsustainable, as accepted by the recent Planning Committee who recently unanimously rejected a planning application on various NPPF and other grounds. This site is far too close to Cobham (1.5km), Pyrford (1.5km) and Woking (2.5km) not to become a suburban sprawl over time which will totally wipe out the Metropolitan Green Belt in this area.

Developments of 2,000+ houses in the Green Belt are exploitation and fulfil developer's dreams who can escape their affordable homes targets (clause 4.2.40) and provide houses for those from outside the borough. I object to GBC realising those developers’ dreams and ignoring those of the residents.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/246  Respondent: 8602465 / Sallie Hair and Beauty (Ms Sallie Hone)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

The removal of any villages from Green Belt, who gives the Council the right to do this, they have always been Green Belt ???

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

Attached documents:

Comment ID: pslp171/101  Respondent: 8604481 / Mr Steve Minter  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

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

I object to the proposal to inset Send Business Park from the Green Belt because
(a) It is effectively an old non-conforming user in an areas of outstanding countryside adjacent to the historic and beautiful Wey Navigation
(b) There is highly restricted vehicular access along vehicular access along Tannery Lane in both directions
(c) Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate

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

Attached documents:

Comment ID: PSLPP16/7828  Respondent: 8605921 / Roger Lindsay  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

I particularly object to the arbitrary moving of internal existing boundaries e.g. In East Horsley apparently to access green spaces and build on them. I also strongly object to the going back on policy by breaching the Green Belt as part of the plan.

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

Attached documents:

Comment ID: pslp171/61  Respondent: 8606081 / Susan Greenman  Agent:
Green Belt - Policy 2 at paragraph 4.3.15

I object to the proposal of Send Business Park being taken out of the Green Belt. It is virtually a non-conforming user in a rural setting by the Wey River.

Further expansion of this location will ruin the Green Belt area and increase traffic along a country lane.

When will Guildford Borough Council and the Conservative Government realise that Send and in fact Surrey and the South East of England are at saturation with too many people, homes and businesses.

The impact of traffic congestion, over population impeding on local services and infra structure is making life intolerable for residents. Already the hospitals and doctors surgeries cannot cope. The schools are over subscribed, there is a huge problem with the elderly and their care, there is not enough housing for purchase or rental and the cause of this has increased prices.

As a Conservative voter my entire life, I am angry that GBC is ignoring their pledge not to build on Green Belt land. These plans, policies and proposals are going to ruin life for local residents who, decided to live in Send and Ripley as rural areas.

I have lived in Send for over 40 years and have seen a deterioration in the area and quality of living.

Potters Lane is now a horrendous "Rat Run" each day in the morning and evening. It is like living on the A3. It has become a very dangerous road and GBC plan will only add to the traffic and pollution of Send and Ripley. How are the schools, Doctors and other infra structure going to cope with all these added homes and industries. It will be become even more intolerable.

Stop adding to the over population of Surrey - ENOUGH IS ENOUGH!!

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

Attached documents:
I feel that this is an insufficient explanation of what is happening. There is no adequate description for example as to the decision process whereby some villages continue to be “washed over” with Green Belt and some not. Nor is it apparent how such a major change can be introduced arbitrarily in this way when NPPF clearly indicates that the characteristics of the Green Belt are its permanence and its openness. We know that NPPF policy states that changes to a Green Belt boundary have to be made at the time of a consultation on a Local Plan and will only be justified in exceptional circumstances. What is not clear is whether so many changes can be justified at one time and whether legitimate “exceptional circumstances” apply on the grounds that the Green Belt is preventing inappropriate development. Surely, this is exactly what it is supposed to be doing. What we are being asked to accept is that because some parts of a village have been built-up in the past then this should be allowed to extend onto additional open areas of the village settlement which Green Belt policy maintains should be kept open.

The Introduction to Policy P2 states in paragraph 4.3.13 on page 48 that:

“The following villages are now inset from the Green Belt: Chilworth, East Horsley, Effingham, Fairlands, Flexford, Jacobs Well, Normandy, Peasmarsh, Ripley, Send, Send Marsh/Burnt Common, Shalford, West Horsley and Wood Street Village”.

In addition paragraph 4.3.15 lists a number of major previously developed sites which are also to be inset from the Green Belt which include the two nationally important AONB sites at Mount Browne and the University of Law, a decision which is subject to objection by Artington PC and CPRE.

Paragraph 4.3.17 also refers to the fact that land at the former Wisley Airfield has been inset as well and will therefore be removed from the Green Belt. CPRE has lodged an overall objection to this development which we consider falls into a totally different category as a strategic site.

It seems apparent that insetting is being used in a number of different areas to change Green Belt boundaries in villages, urban locations, strategic sites and major existing developments such as the Henley Business Park, HM Prison at Send, Pirbright Barracks and the Pirbright Institute.

The way in which this topic has been announced hardly suggests that this is still a matter for consultation as we are told that Regulation 19 now applies. However, we maintain that there has been insufficient transparency on this matter because of how the draft Local Plan has been edited, and that clarity of presentation on this new policy has not been handled adequately.

CPRE has had to spend some time finding the relevant policy references and considers that they are not clearly laid out for easy comprehension as one would normally expect for a policy change of considerable impact and importance. This is a major issue as the failure to clarify the policy in one place in the draft Local Plan will serve to deter investigation and/or understanding by those communities most involved owing to the difficulty of locating all the relevant text concerned.

Surprisingly, one has to turn to paragraph 4.5.50 in Policy D4 on page 106 to obtain further information relating to insetting and the policy which is to be followed in this context in urban and inset village areas. This states that 15 villages are to be affected.

A provisional decision has apparently been made that these villages do not qualify in terms of openness to remain in the Green Belt. This will mean that the Green Belt boundary will have to be amended in no less than 15 communities. However, it is unclear if or when this issue was discussed with Parish Councils and how far Local People in the villages concerned have been involved in the consideration of this decision. Furthermore, so many changes to the Green Belt boundary at one time hardly qualify to be justifiable under “exceptional circumstances” since 15 different individual sites are involved. We also question whether “openness” should be the only consideration to take into account when Green Belt has no less than five other purposes that ought to be met.

It is our concern that the justification for removing villages from being washed over by the Green Belt boils down to a desire to increase development which would formally have been considered “inappropriate” because other unspecified development management policies will apply that are less effective and robust. We are not convinced that many of the villages concerned would welcome this approach. If this proposal were to go ahead, it has been reported that no less than 105 kilometres of new Green Belt boundary would be involved.
We also have serious reservations as to whether these proposed changes stand up to closer examination. We assume that this proposal is based on the “evidence” given in the revised version of volume 4 of the Pegasus Green Belt & Countryside Study upon which we are reluctant to place much weight. We do not have confidence in the “evidence” that this document contains. We also note that an attempt is being made to increase the settlement boundaries of several villages without clarifying clearly what is being done.

So let us have a look at a few examples of what is proposed.

I know Effingham well and am familiar with its Conservation Area and the open land at the King George V playing fields, Browns Field, Effingham Golf Club, Effingham Lodge Farm and Effingham Common. All of these areas are distinguished by their openness as is the land beyond the Little Bookham boundary adjacent to Manor House School. Land to the South of Effingham also includes open countryside. I am not clear whether it is acceptable for Guildford to make changes in the Green Belt at Effingham without first advising Mole Valley Council of what they intend to do just over the borough boundary. It is a community which is already in danger of merging with the villages of Little Bookham and East Horsley through linear development along the A246 and the Lower Road. Surely, we do not wish to weaken the protection afforded by the “washed” over Green Belt provision in the circumstances we have described.

It is easy to point out the openness of the villages of Flexford/Normandy, and the Horsleys as they are today. The problem relates to the inappropriate development that is proposed in the draft Local Plan which is determined to force through what we consider incipient urban sprawl in these communities and transform their current rural environment. This will require an extensive boundary review for the Green Belt to take place so that they can absorb more housing. CPRE has already objected to this elsewhere with respect to these sites. The draft Local Plan is not acceptable because it is seeking to undermine the long established implementation of successful Green Belt policy.

Moreover, we are aware of numerous amendments which have been surreptitiously made to settlement boundaries in order to facilitate further building development for the draft Local Plan. We do not consider that these changes have been made in such a manner that they will be immediately understood by the public because they are not easily “transparent” in the information available.

It seems to us that the draft Local Plan as it stands is unsound because it is based on too high an “Objectively Assessed Need” (OAN) figure for housing, a refusal to deduct constraints, and it consciously seeks to undermine the Green Belt to facilitate the unrealistic achievement of reaching this target. CPRE believes in the value of the Green Belt which it is determined to defend and accordingly adds this objection to the others it has submitted already. We consider that what we have discussed in this letter and the other submissions we have made amounts quite simply to bad planning.

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

**Attached documents:**
The NPPF states clearly in Chapter 9 that it attaches great importance to Green Belts and that “the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.”

Paragraph 80 of the NPPF reads as follows:

“Green Belt serves five purposes:

+ to check the unrestricted sprawl of large built-up areas;
+ to prevent neighbouring towns merging into one another;
+ to assist in safeguarding the countryside from encroachment;
+ to preserve the setting and special character of historic towns;
+ and to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.”

The draft Guildford Local Plan is in conflict with this list of the five purposes of the Green Belt, and also seeks to challenge the fundamental aim of Green Belt policy which is to prevent urban sprawl by keeping land permanently open.

CPRE OBJECTION.

Paragraph 14 makes clear that “the presumption in favour of sustainable development” is to be limited where “specific policies in the framework indicate development should be restricted”. These policies are listed in Footnote 9 to Paragraph 14 and include sites protected under the Birds & Habitats Directives, Sites of Special Scientific Interest, land designated as Green Belt, Areas of Outstanding Natural Beauty, Local Green Space, designated heritage sites and locations at risk of flooding. All of these categories apply to the Guildford District. Constraints should be taken into account in the Housing Need Figure (OAN) and the figure of the Housing Target in the draft Local Plan lowered accordingly.

Paragraph 83 states that “once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan” which is of course the process with which we are now concerned. CPRE maintains that “exceptional circumstances” is a far stronger requirement than the “very special circumstances” referred to in Paragraphs 87 and 88 when considering regular planning applications as to whether they are appropriate or not. The definition of “exceptional” is much more specific and relates to rare occasions which are outside normal policy planning process. “Exceptional circumstances” have to be regarded as not the norm. They are to be characterised as unique and permanent, and the opposite of required general practice which is concerned with planning interpretation and implementation for specific applications. That is one of the reasons that a boundary change can only be considered when a new plan is being prepared and discussed.

It follows that a boundary review of the Green Belt is a unique and rare occurrence which is “exceptional”. The draft Local Plan, however, seeks to make numerous boundary reviews of the Green Belt in many different Guildford borough locations at one time, which clearly infringes the permanence rule which applies to the Green Belt designation. Moreover, the Guildford Borough Local Plan which was adopted in January 2003 agreed to a major change in the Green Belt boundary when the University of Guildford Manor Park campus was permitted. It is clear to us that it was not intended that any further changes to this permanent boundary would be allowed a few years later at a subsequent Local Plan. We maintain that this renders the proposed draft Plan unsound because it follows an incorrect policy approach.

CPRE OBJECTION.
We also do not accept the arbitrary way in which the Pegasus Study has concluded that Green Belt sites which fulfil only 2 of their 4 “purpose assessment tests” are categorised as only of “medium sensitivity” and therefore available for possible development should they meet other policy requirements. This is a fundamentally flawed policy approach which is designed to accelerate erosion of the Green Belt in a totally unacceptable manner for the purposes of housing development and will result in urban sprawl encroaching onto open countryside. CPRE OBJECTION.

CPRE is additionally concerned about how Paragraph 85 of the NPPF should be interpreted with its reference to “defining boundaries” and “safeguarded land between the urban area and the Green Belt”. We support the concept of villages being “washed over” by the Green Belt as part of the approach to be followed in Guildford but it is our impression that the term “safeguarded” is rather the opposite of its normal dictionary definition when it comes to the long term permanent protection of the Green Belt. Nor do we agree with the use of “insetting” in sensitive locations such as at Mount Browne and the University of Law in Artington PC which are within both the Green Belt and the Surrey Hills AONB, or its use in a policy change which will effectively remove 14 villages from any real Green Belt protection. It is important that Local PCs can reach decisions regarding the openness of their village communities rather than have to accept a centralised judgement on this issue. This extra element in influencing local decision-making is undesirable. CPRE OBJECTION.

Guildford has a Parish Council heritage with a well informed knowledge of the countryside in its local areas. We believe that as the Minister states “local people” will and should be making decisions about the numerous changes proposed in the draft Guildford Plan as regards the settlement boundaries in their communities and not being advised of this “from a distance” which avoids the use of fully informed local input. Changes as well to conservation area boundaries are a sensitive matter that needs careful local attention. Elsewhere in this document, we have referred in addition to the interpretation of draft Policy H3 regarding Rural Exception Homes which we find not tightly defined sufficiently.

It is important that Guildford and its neighbouring communities do not merge into one another through the steady erosion of the Green Belt in the way proposed in the draft Local Plan now under consultation. They should rather be encouraged and seek to retain their separate character, identity and setting. It is essential that these elements of planning are recognised and supported by GBC rather than allowed to be undermined bit by bit. The green gaps between villages should be retained and not succumb to linear “ribbon” development along roads and railways. The green approaches to Guildford’s villages, such as for example Effingham, should be protected so that they remain as far as still possible distinct from their neighbouring communities at Bookham and East Horsley. CPRE objects to the way in which Guildford also is in danger through its draft Local Plan of merging into neighbouring towns such as Godalming. The constant unbalanced emphasis on economic growth will harm the countryside that so many residents and visitors value and cherish. CPRE OBJECTION.

CPRE objects to the continued reliance on the “evidence” in the Pegasus Report for the new draft Local Plan which was shown to be inaccurate in many aspects during an earlier consultation process to which the public expressed their objection in large numbers. We deplore the way in which value judgements made for this discredited report – which has not been changed – are being used for the “traffic light” evaluation of 4 of the 5 Green Belt purposes listed above. We object to this method of approach using these often misinformed evaluations which define the sensitivity value of the Green Belt into the 3 categories of Red, Yellow and Green. This is an unacceptable basis upon which to justify a wide range of Green Belt boundary revisions which cannot be considered adequate for the draft Local Plan with its “exceptional circumstances” requirement. It deliberately ignores the NPPF policy which emphasises the importance of the Metropolitan Green Belt and its permanent nature. The policy also makes clear that its boundaries are designated to prevent urban sprawl by protecting openness. The boundaries of the Green Belt were established for this purpose and are as valid now as they were when first introduced. They were not intended to be altered by an onslaught of changes each time a Local Plan was brought forward for consideration. CPRE therefore objects most strongly to this proposal and believes that the draft Local Plan has to be considered unsound on these grounds. “Exceptional circumstances” by their definition do not encompass a multiplicity of changes along the lines envisaged. CPRE OBJECTION.
The following information appears on the web site dated June 7th 2016 of Brandon Lewis MP, the Minister of State for Housing and Planning:

“Many people contact me about development on the Green Belt, particularly when it is on land near our villages. I am exceptionally fond of the British countryside. While it is up to local authorities to determine the development of new homes through local plans, I would like to reassure you that the Government is acting to protect the Green Belt from inappropriate development. National planning policy is explicit that key protections such as the Green Belt cannot automatically be overridden by the presumption in favour of sustainable development. Planning Policy also guarantees strong protection for National Parks, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. Powers have also been given to councils to resist unwanted garden grabbing and to protect valuable local green spaces from caravan and traveller sites.”

In view of this informal statement of national policy, we should like to see GBC reconsider the draft Local Plan that is now under consultation which undermines and erodes the Green Belt in Guildford Borough extensively. CPRE has major objections to the way in which Green Belt policy is being ignored by GBC using the “Objectively Assessed Need” figure for housing of 693 houses per annum as a justification for their recommendations. We object to this approach since we believe it is linked to evidence that is flawed as indicated by Green Balance and other specialists in this field.

The web site goes on to state that “latest statistics show that the level of Green Belt development is now at its lowest rate since modern records began in 1989.” This is an achievement which underlines the permanence of the Green Belt policy in stark contrast to what is proposed for Guildford. CPRE therefore objects strongly to the draft GBC Local Plan which it finds to be unsound.

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

Attached documents:
CPRE expressed its major objections to this Policy on pages 13 to 15 of the submission it made to the draft Local Plan 2016. It appears that no major apparent attention was taken of our views.

CPRE objects again to Policy P2 which demonstrates the frustration that so many of the public feel at the failure of the Council to respond to their submissions or listen to their objections. Such changes as have been made to Policy P2 by the Council amount to only a few words and very minor corrections.

This is in conflict with the repeated references made to the size and implications of the Green Belt on planning, where it is alleged to represent no less than 89% of the total land area of Guildford. This claim does not of course explain that a substantial proportion of the Green Belt in Guildford covers Surrey Hills AONB and AGLV countryside and also other notable development constraints such as ancient woodland, heathland, registered commons and MOD land which are protected anyway.

We object that Mount Browne and the University of Law are mentioned as if they were subject to Green Belt policy alone whereas in fact they are within the Surrey Hills AONB. This is presumably a mistake in drafting.

We object also to the addition of Ripley to the list of 12 villages where Limited Infilling will be permitted following the introduction of insetting, a process to which we have already expressed our opposition. Ripley is a village where Green Belt openness is very apparent and is currently working on its Neighbourhood Plan which we feel confident will seek to reinforce Green Belt protection.

It appears that the Green Belt Supplementary Planning Document (SPD) is not as yet available (4.3.20) which we should be reviewing at this juncture as part of the Local Plan consultation process.

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

**Attached documents:**

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**Comment ID:** PSLPP16/8650  **Respondent:** 8608225 / Valerie Jenner  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

I object to removing Ripley, Send and Clandon from the Green Belt (Policy P2) together with the proposed development sites at Wisley Airfield and Garlick's Arch. I understand there have to be exceptional circumstances for these areas to be removed as required by National Planning Policy. We are providing large areas of countryside where people can walk and ride cycles and horses and generally enjoy the open air. Why cannot existing brownfield sites such as the one at Burnt Common which was removed from the original plan, be used instead of Green Belt?

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

**Attached documents:**
Comment ID: PSLPP16/1235  Respondent: 8608865 / WBDRA. (David Bird)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

WBDRA COMMENTS that all measures to retain Guildford's Green Belt and to limit infilling must be implemented.

Policy P2 must be expanded to include Para 80 of the NPPF.

We OBJECT to any policy or planning initiative allowing the coalescence of the urban areas of Guildford & its surrounding villages with surrounding Boroughs.

Guildford is a medium size market town restricted for major development by its roads, flood plain, AONBs and lack of adequate infrastructure Piped services, sewage etc). The London/Thames Valley Mega City concept is not one WBDRA can support.

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

Attached documents:

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Comment ID: PSLPP16/2388  Respondent: 8609217 / West Clandon Parish Council (John Stone)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

POLICY P2 – Green Belt We object to this policy.

1. It does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

1. The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected are This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

1. Paragraph 3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of green belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

1. The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. We believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The
Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

1. As mentioned above we note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and we consider this to be a deliberate untruth which compromises the consultation. We would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (We assume the document was delivered to most houses in the Borough.) We reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

1. We object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them. We also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

1. To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. We cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead. This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

1. Paragraph 3.17 states that “the general extent of the Green Belt has been retained.” We believe this should be deleted as an untruth.

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

Attached documents:

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<th>Comment ID: pslp171/786</th>
<th>Respondent: 8609217 / West Clandon Parish Council (John Stone)</th>
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<td>The Plan states: “4.3.16 National planning policy requires that Green Belt boundaries are only amended in exceptional circumstances and that this must be undertaken as part of the Local Plan process. We consider that exceptional circumstances exist to justify the amendment of Green Belt boundaries in order to facilitate the development that is needed and promote sustainable patterns of development.”</td>
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<td>1) In the introduction to the Policy statement, numerous sites are taken out of the green belt including Gosden Hill, Blackwell Farm, Garlick’s Arch, Burnt Common, the prison and a number of villages. The Plan fails to detail the exceptional circumstances that have been identified for each site that is to be taken from the green belt.</td>
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<td>2) It appears therefore that the Plan is based on an assumption that because the housing number cannot be accommodated on brownfield or previously developed land in the green belt, it is legitimate to move the boundaries. A blanket change to green belt boundaries is being made to facilitate development. That is not in accord with the NPPF or ministerial statements.</td>
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Comment ID: PSLPP16/9087  Respondent: 8609377 / Mr Andy White  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

Land removed as Green Belt in 2003 has not yet been utilised and yet more land has been allocated. The “Traffic Light” methodology is floored and many inaccuracies remain despite comments in previous consultations.

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

Attached documents:

Comment ID: PSLPP16/12575  Respondent: 8627009 / East Clandon Parish Council (Sibylla Tindale)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

I object to the Settlement Boundary which has been imposed on East Clandon without any consultation. This imposition provides no protection to further development outside of the settlement boundary (Policy P2 para 4.3.25) and is deemed by me as being unnecessary in an already tightly developed ancient and rural conservation village with high archaeological merit. I demand that this proposal be removed as it will endanger the openness of the Green Belt, the views in and out of the AONB (protection of the AONB Policy P1) and the character of our village.

Policy P2 – Green Belt: I object to this significant erosion of the Green Belt with the proposals for large towns being developed on Green Belt land thereby removing the openness of the Green Belt. I note in particular the huge developments proposed for the North East quadrant of the borough which will adversely affect our amenity, but also unfairly targets our tranquil rural villages because we can provide ‘dormitory’ facilities for commuters to London. The developments directly affecting our villages are the proposals for Wisley Airfield, Gosden Hill Farm, various farms and tracts in the Horsleys and Garlicks Arch at Send.

Further, on the erosion of Green Belt and I object that Policy P2 is not met where it states that Green Belt should be protected. I object to the disproportionate use of Green Belt land for housing – some 65% of the housing proposed is on Green Belt and with little consideration being given to redevelopment of brown field sites.

I object to building on the Green Belt because the essential characteristic of Green Belt is its openness and permanence (National Planning Policy Framework paragraph 79).

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

Attached documents:

Comment ID: PSLPP16/12580  Respondent: 8627009 / East Clandon Parish Council (Sibylla Tindale)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

I object that GBC are contravening the NPPF framework stipulation in paragraph 87 with the proposed developments at Gosden Hill Farm, Ripley, East and West Horsley and Garlicks Arch, Send. Paragraph 87 states “As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.” and GBC have not proven any special circumstance for developing on these Green Belt areas.
Section 5: Settlement Boundaries

Shalford Settlement Boundary

5.1 Fields behind the Village Hall and at Christmas Hill: The insetting proposals include a re-drawn settlement boundary which encloses a piece of land to the south of the Shalford Village Hall, and a further triangular strip to the east behind the houses on Kings Road in Christmas Hill, both of which would in consequence lose their current Green Belt protection. We oppose this proposal for the following reasons:

5.1.1 Both tracts of land are in a relatively elevated position within the village and as such form a very visible part of the open character of the village and its connections to the Green Belt. Any development of this land will significantly diminish the open aspect as viewed from Kings Road, the Common and surrounding areas.

5.1.2 Any development on the land to the south of the Village Hall would be particularly harmful to the Village Hall and its surroundings, which lie directly below the site. The land rises steeply behind the hall, and building on such an elevated site directly adjoining the village tennis courts and bowling green would have a marked impact on this important communal area, in both visual and practical terms. We know that our Tennis Club and Bowls Club, as well as their individual members, have responded to the proposed Plan detailing the practical effects which development of this site would have on their facilities.

5.1.3 The triangle of land behind and to the south of Christmas Hill is also in an elevated position and forms a very visible part of the open character of the village and its connection to the Green Belt. It appears that the re-drawn boundary as proposed has more to do with a neat line on a map rather than any proper evaluation of the land. We see no justification for this particular amendment to the settlement boundary which should not be so amended and this land should remain as Green Belt.

5.1.4 The land in question is all classified as AGLV. The proposed Policy P18 on Surrey Hills AONB, which we very much welcome, states that

“the AGLV will be retained until such time as there has been a review of the AONB boundary. Proposals within the AGLV will be required to demonstrate that they would not result in harm to the AONB or the distinctive character of the AGLV itself”

Given this policy it is clear that the redrawn settlement boundary affecting the land behind the Village Hall and Christmas Hill should not have included any of this open grassland, and that it should have been retained as Green Belt.

5.1.5 It appears that Shalford is the only village in the Borough in which a proposed change of a settlement boundary brings areas of AGLV into an inset village and deprives them of their Green Belt protection.

5.1.6 The existing settlement boundary is defensible with already existing established hedges which have been there for over 50 years. These hedges and fences clearly mark the edge of the current boundary between settlement and open AGLV land. However, it is understood and accepted that the settlement boundary should be amended to embrace the Upper Village Hall, tennis courts and bowling green.

5.1.7 We understand that the Plan has now designated the land to the south of the Village Hall as Open Space as shown on the policies map for Shalford south on page 364 of the Plan. Whilst this is a welcome proposal and appears to give
strong protection to the retention of the land as Open Space we are aware that the land is under option to a developer who is contracted to pursue development of this land and is likely to make representation to the Inspectorate regarding the Plan. At this stage we feel that if the current settlement boundary were to be retained, the land in question would still be part of the Green Belt and as such would enjoy greater protection from any risk of long term development. As we, as a Council, are not planning experts we would ask that the Inspectorate give consideration to the strongest form of protection for this land which is of great concern to the parish residents. It is more than worthy of note that the land on which the Village Hall and clubs are now sited was originally given by Mr Edgar Wigan in 1962 “for the use of the inhabitants of Shalford and the neighbourhood....in particular for the use of meetings, classes and other forms of recreation and leisure time occupation, with the object of improving the conditions of life for the said inhabitants” Further we understand that there is reason to believe that the donor, who also owned the fields behind the village hall, intended them to remain open and undeveloped.

5.2 Common Land in Shalford

5.2 The re-drawn settlement boundary as proposed has incorrectly included Common land within Shalford. In particular the Common land abutting the Horsham Road together with a triangle of land opposite Snooty’s Groceries, and a triangle of land in Chinthurst Lane have been included within the new settlement boundary. The Common land in Chinthurst Lane extends to the south-east towards Wonersh for a considerable distance on both sides of the lane. None of the land should be shown as being within the settlement boundary as to do so implies that it does not enjoy the protection of the Green Belt even though it is still Common land. For the avoidance of doubt for future generations of planners and citizens this error should be corrected.

5.3 Chilworth Settlement Boundary

5.3 There are two proposed changes to the settlement boundary in Chilworth within the parish and we do not support them.

5.3.1 Firstly, there appears to be no justification to include the land adjacent to Old Manor Farm, other than it being perceived as “tidying up” the boundary and has poor access, as it falls to the river Tillingbourne. It is our understanding that this land remains as part of the AGLV.

5.3.2 The other proposed boundary change extends the settlement to include Tillingbourne Junior School and playing fields. We have been advised school playing fields have specific statutory protection under Schedule 14 to the Education Act, but that does not allay our concern. We are aware that many councils have sold playing fields for development over recent decades and, despite statutory protection, are continuing to do so. We consider that it is important that the Tillingbourne School playing fields remain outside the Chilworth settlement boundary and retain their Green Belt protection.

Peasmarsh Settlement Boundary

5.4 We have received no representations from residents on the proposed settlement boundary.

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

Attached documents:

Comment ID: PSLPP16/18629  Respondent: 8627201 / Shalford Parish Council (Nuala Livesey)  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  

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

Section 4: Insetting of Villages- Policy D4

4.1 In response to the Issues and Options document (2013) we raised concern at the process by which the review of current Green Belt boundaries was undertaken. The process described in the Report (Green Belt and Countryside Survey Vol IV Insetting of villages and defining new Green Belt boundaries) involved a number of assessments: ‘assessing the
degree of openness’, ‘assessing the location of Green Belt boundaries within the surroundings of each village’ and ‘assessing the suitability of each village for insetting’. We have never found any details of the criteria on which such assessments were based and, despite having been advised by a senior officer within GBC Planning Office that this process is objective, it continues to appear to us to be highly subjective and considerably flawed.

4.2 We note that the objective/subjective assessment process has resulted in 15 of the 24 villages within the borough being recommended for insetting. In consequence of this, certain villages in the Tillingbourne valley, with the exception of Albury, Gomshall and Shere stand to lose their Green Belt protection.

4.3 A key element in determining whether a village should be inset appears to be the perception of whether it is ‘open’ or ‘closed’. We believe that the vast majority of residents and visitors to the villages of the Tillingbourne valley would regard their character as open, as there are extensive visual connections throughout all these villages to the open countryside of the Green Belt.

4.4 In our view it would be highly undesirable to inset any of the Tillingbourne villages. They all lie between the North Downs and the greensand area to the south, and are visually connected to and from the Surrey Hills AONB. They form part of a unique industrial and landscape heritage (detailed in the 2013 application to the Heritage Lottery Fund, led by the Surrey Hills Board). We believe that all the villages in the valley should be regarded as being open and the insetting process needs to be re-evaluated. In our view this is essential if these villages are to preserve their long-term attractiveness and serve to develop the tourism business which GBC wishes to promote.

4.5 Specific issues about insetting villages of Chilworth and Shalford

4.5.1 We note that page 82 of the Report on the Insetting of Villages (Green Belt and Countryside Study Vol IV) states that ‘the settlement of Shalford contains two distinctive areas: one north and one south of the Kings Road and open Common land’. Furthermore ‘it is close to the urban area of Guildford yet has a Common, rivers and streams converging that make it seem like the countryside’. In addition the Report states: ‘Shalford is situated in the Shalford Gravel Terrace landscape’, ‘the villages of Shalford and Chilworth cover much of the area’ and ‘the landscape strategy for Shalford gravel terrace is to conserve the Commons and the pastoral farmland, the historic village centres and the characteristic relationship of the buildings edging the Common’. We note that the proposed insetting of the villages of Shalford and Chilworth is in conflict with this landscape strategy.

4.5.2 With respect to the village of Shalford we note that the part of the village to the north of Christmas Hill up to the railway line and going east to Bradstone Brook which is clearly “low density” has been omitted from the perceived Village Area identified within the Green Belt – this omission increases the percentage of built development to open land with a clear impact on the proposal that Shalford should be determined as a “closed” village. It also seems illogical to totally exclude the Common land which is in the centre of the village between two settlements from the assessment of “the degree of openness” as any observer would have a very clear impression of the village as having a substantial degree of openness.

4.5.3 As detailed above, we feel that the proposed insetting of the village of Shalford is inappropriate because the settlement shows open characteristics and in particular the southern portion of the village has relatively low density. We also question the ‘perceived Village Area within the Green Belt’, which produces a higher density of developed land than would be calculated if this ‘perceived Village Area’ were redrawn to reflect the village correctly and in particular included the Common land. This matter should be re-addressed by the consultants in conjunction with the local residents who know their village, and we urge GBC to undertake this review as a matter of urgency.

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

Attached documents:

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<th>Respondent: 8627201 / Shalford Parish Council (Nuala Livesey)</th>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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</table>
We note and support the following policies in the Plan:

**Policy P1 Surrey Hills AONB and Policy P2 Green Belt** We are delighted to see that GBC understands the importance of protecting the Surrey Hills AONB and appreciates “the high quality of AGLV in its own right” together with the presumption against development within the Green Belt. We strongly urge GBC to respect the principles of this policy by maintaining the AGLV and Green Belt status of the sites behind Shalford Village Hall and Christmas Hill (see Sections 5 and 6), and by reviewing its proposals to inset the Tillingbourne Valley villages of Chilworth and Shalford (see Section 4).

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/9838</th>
<th>Respondent: 8627393 / Worplesdon Parish Council (Gaynor White)</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<tr>
<td>P2 Green Belt and Limited Infilling</td>
<td>The coalescence between the urban area of Guildford and the surrounding villages and also Guildford with the surrounding boroughs should be strenuously resisted. This policy should be expanded as per paragraph 80 of the NPPF. The Borough Council’s duty to cooperate should extend to Rushmoor Borough Council, Surrey Heath Borough Council, Woking Borough Council and Waverley Borough Council.</td>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/10073</th>
<th>Respondent: 8640353 / Julian Cranwell</th>
<th>Agent:</th>
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<tr>
<td>We object to Policy P2 green belt This policy states, “the general extent of the Green Belt has been retained.” We do not accept this statement. The policy wording is weak in support of the Metropolitan Green Belt even though the latter forms 89% of the borough and should be the cornerstone of all local planning policy. It is precious beyond the short-term demands of the present Government’s policy or a 15-year local plan. As noted under Policy S1 above, it is a solemn legacy to future generations – an asset and amenity that belongs as much to Londoners and the whole nation as to the people who live in it. It is an inalienable public good. Once gone it is gone forever. It is not the Council’s to give away. Policy P2 completely fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it has been around for a long time and it needs to be permanently protected. It was actually established in a local act of parliament in Guildford under the London Home Counties (Green Belt) Act 1938 and subsequently in the 1944 Greater London Plan to contain the outward sprawl of London. The boundaries of the Green Belt through Guildford Borough were later defined in the 1987 Local Plan, forming part of a 19-24km concentric belt around London. The Green Belt is intended to check the unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and other urban land. The principles of the Green Belt designation were outlined within Planning Policy Guidance 2: Green Belts (PPG2) and are found within the National Planning Policy Framework (NPPF). The Metropolitan Green Belt is an exemplar of good planning and the envy of...</td>
<td></td>
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planners throughout the world. Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. Building on it involves high opportunity costs, including an irreversible loss of:
1. Agricultural production
2. Rural leisure and tourism amenities
3. Water catchment
4. Flood control
5. Biodiversity
6. Natural heritage
7. A carbon sink for air pollution
8. Room for public facilities such as parks and burial grounds
9. Profitable film locations (e.g. Shere)
10. Future economic potential such as mineral extraction (even fracking)
11. Natural beauty, landmarks, open space, rural views and sightlines
12. Benefits to public health and wellbeing, physical and psychological (as well expressed in the NPPF)

As a matter of law and national and local policy, these assets should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultations. It is quite incorrect to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold. No-one argues that we should sell 1.6% of the Crown jewels in order to build houses. We object to the “insetting” of 14 villages from the Green Belt, and at “infilling” 12 of the borough’s Green Belt villages. We are deeply disturbed that settlement boundaries are to be hugely extended in many villages and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are “leggy” in outline, reflecting the effect of ribbon development (often along just one side of existing roads) permitted between the Wars. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost hell bent on self-defeat. We believe this policy is based on a flawed Green Belt and Countryside Study that, according to one Conservative Councillor, was irregularly commissioned by Council officers without the authority of Councillors. To “inset” two thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. We cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, although they would quickly destroy them if the proposed “insetting” and boundary extensions go ahead. This policy is wildly disproportionate in terms of any foreseeable development need (especially post-Brexit) and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

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

Attached documents:

Comment ID: PSLPP16/10099  Respondent: 8640353 / Julian Cranwell  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

We object to ALL Green Belt sites allocated for development in the local plan. We object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development, however, it does identify the principle of development and uses.” This ignores the tens of thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. This amounts to a war of attrition by the Council in conjunction with developers, since many busy residents are sick and tired of repeating the same comments to deaf ears. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints. All Green Belt sites should be removed from the plan until “exceptional circumstances” for development are proven, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Rather than insist that a small number of Green Belt villages cope with several hundred new homes, it would be fairer and less damaging if smaller numbers of new houses were built over a much larger number of villages.

This would mitigate the negative impact on local services, such as GP surgeries, schools, and transport, and the electorate would have more confidence that GBC is working in an equitable way and not unfairly sparing those areas where some local councillors live (Ash South and Tongham, for example).

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

1. **POLICY P2**

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and...
nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of “About Guildford” (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

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

Attached documents:

Comment ID: PSLPP16/5253  Respondent: 8655233 / Kay Mackay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. SITES - POLICIES A1 TO A57

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

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

Attached documents:

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Comment ID: PSLPP16/1139  Respondent: 8659489 / Helen Bennett  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

Objection: Changes to the Green Belt

I am particularly concerned about the changes to the Green Belt. The areas of open country in Surrey define its nature and provide a natural environment for wildlife, agriculture and for people. All of which are essential and, once lost, is gone forever. GBC seems to be intent on reducing the Green Belt and its protections. Surrey Hills AONB needs to be vigorously protected and not dismissed as having little protection in law. Two thirds of the proposed developments are on Green Belt land. This is unacceptable: any incursion will provide opportunity for more damage in the future.

Objection: East Horsley is in the Green Belt and this affords it protection from suburban sprawl. Its Green Belt status has been a key factor in preserving that character. One third of East Horsley is composed of woodlands. The Green Belt has preserved the rural character of the village. There is a proposal to move the East Horsley settlement boundary to the edge of Lollesworth Wood is unacceptable. These are agricultural fields. A change to Green Belt boundaries require ‘exceptional circumstances’. More land for housing is not a sufficient justification for changing a Green Belt boundary.

Objection: The proposal to remove Kingston Meadows out of the Green Belt is non-sensical. Kingston Meadows is the recreational space of East Horsley. It has sports facilities and playing fields. What possible benefit can there be in taking it out of the Green Belt and then leaving it vulnerable to “enterprising” developers in the future to offer some minor inducements for future facilities as a trade off for building plots.

Sites for development

Objection: I question the need for the level of house building set out in the plan. The statistical basis is flawed and overestimates the number of houses required for those living and working here. Certainly, it has not been demonstrated that this increased housing stock is required in East Horsley.

Support: However, the site of Thatcher’s Hotel is a possibility as long as it keeps within the current building boundary and does not extend to the open fields behind.

Objection: the green-field site behind the houses on the western side of Ockham Road North is Green Belt land and should not be developed.
West Horsley

**Objection:** The 405 houses proposed represents an increase of one third in the current housing stock, most of which are on open fields in the Green Belt. This is an overwhelming number for a small village and will fill-in every bit of its green space, destroying its character.

**Objection:** Proposal to remove Wisley Airfield from the Green Belt.

Despite the objections by GBC to the recent proposal to build what amounted to a small town on the airfield. The proposal to build 2000 houses still seems to be on the Local Plan. The objections included concerns about air quality; lack of public transport; the housing density; the visual impact from AONB of the North Downs. In addition to the many inaccuracies in the planning application about the nature of the land and the access to major roads and the railway stations. What has changed? The A3 and M25 interchange will not move; the stations will not get nearer. The rural character of the roads and environment will be destroyed by such a proposal. GBC should be protecting the true rural character of Surrey, not seeking to destroy it.

I hope that GBC will act to support its current residents and their wishes, rather than pursue some ideological process for urbanising the this corner of England and facilitating a continuous sprawl of housing with few social facilities.

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

Attached documents:

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**Comment ID:** PSLPP16/1651  **Respondent:** 8659489 / Helen Bennett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

I have little confidence in the GBC desire to protect the Green Belt. There should be no loss no Green Belt protection in any local area. Every hedge and field is important. Once lost or encroached upon it is lost forever and provides a precedence for further planning proposals on this precious resource. Why is the proposal for 2000 houses on the disused Wisley runway even being contemplated as it was rejected for a range of misleading information and inappropriate plans? This is almost entirely agricultural land in the Green Belt. It is not attached to a village; it is a new town. The scale of the housing proposed for many of the villages, almost entirely on Green Belt and green field sites, will change the local environment for ever. The GBC should be working for its current inhabitants not on some strange policy venture of its own.

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

Attached documents:

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**Comment ID:** PSLPP16/3980  **Respondent:** 8660929 / Alec Dawson Shepherd  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

I wish to register my objection to the proposal that "In total, 1.6% of green belt land will be removed and allocated for development during the plan period". I see no reason why a principle of no net loss of green belt could not be followed. I note the statement that "4.3.13 The following villages are now inset from the Green Belt: Chilworth, East Horsley, Effingham, Fairlands, Flexford, Jacobs Well, Normandy, Peasmarsh, Ripley, Send, Send Marsh/ Burnt Common, Shalford, West Horsley and Wood Street Village". Does this mean that they were inset prior to the current planning...
I am writing to express my serious concerns relating to the most destructive policy ever to be imposed on the population of Surrey, or as you call it the ‘Guildford Borough Plan’. In addition to my comments below which directly relate to the outlined proposals, I am disappointed and perplexed as to how the council feels to is right to make such ludicrous plans at the significant expense of areas of outstanding natural beauty in the Guildford area.

The plan is a total attack on the beautiful green areas which surround the northeast of Guildford, and it is not only unethical to propose building on Greenbelt land but destructive to a small local village community within this region. Greenbelt land is intended to protect small village settlements, such as West Clandon, from the urban sprawl of larger town and cities, and the residents of such communities live away from urban areas out of choice. As such it is totally unacceptable to be proposing to build on such large green spaces as an urban extension, when it will totally transform the number of residents living within a parish.

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

Attached documents:
guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.
GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

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

Attached documents:

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Comment ID: PSLPP16/5056  Respondent: 8667713 / Victoria Sinnett  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

19. SITES POLICIES A1 TO A57

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other The plan says that “allocating these sites does not grant planning permission for development.”

   However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

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

Attached documents:

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Comment ID: PSLPP16/3240  Respondent: 8668225 / Cecil Hinton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

Objection to the settlement boundary change behind Shalford Village Hall

I strongly object to the proposal in the Guildford Borough Council’s Local Plan to take the land behind Shalford Village Hall out its present Green Belt and Area of Great Landscape Value status.

The effect would be to remove this land from its protected position and open the way for future housing development. This is highly undesirable for the following reasons:

1. We need to protect the open character of this land for the enjoyment of future generations. Users of the Halls often comment how delightful it is to have the open green fields at the back and the Common and pond to the front. A couple of years ago I arranged a large family reunion at the Village Hall and relatives came from all parts of England, Wales and Scotland as well as Australia and Canada and many expressed their pleasure at the lovely site.
2. The land behind the Village Hall is on one of the highest elevations in the area. The ground level is at the same elevation as the roof of the main Village Hall. Any 2 or 3 storey buildings would be widely visible from the road and significantly impact upon the open character of the village and green nature of the locality.

1. Any development would undermine the character at the heart of the village where so many people come from far and wide to enjoy the facilities within the Tennis and Bowling clubs and the Village Hall. Houses and gardens overlooking the village hall and its sports facilities would spoil this.

2. Environmental damage and localised flooding will increase if development takes place in the areas directly surrounding this elevated open space.

1. Access for any future housing development on this site will be via Chinthurst Lane, which is not equipped to take any more traffic and even now is often highly dangerous for pedestrians.

1. Whilst this proposal only involves a relatively small site, the environmental damage is quite disproportionate to any perceived benefits.

1. In summary it is wrong to take these fields out of the Green Belt boundary and put them within the settlement of Shalford. Only a small adjustment to the 2003 boundary is necessary to reflect the 1999 development behind the Village Hall and thus keep its Green Belt status.

All present and future users of the Village Hall will appreciate full and sympathetic consideration being given to this objection.

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

Attached documents:
I object to any land that is at present in the greenbelt being designated as suitable for building.

Allowing these areas to be included in the DLP will give the green light to developers to put in applications anywhere they choose, not just on land proposed by GBC.

Indeed, at West Horsley, there is already a proposal by a developer to build on a large, sloping and very visible field at the junction of the A246 and Shere Road, a site which was previously in the 2014 DLP, but had been removed in the latest one.

20,000 objections were sent in to GBC to the 2014 DLP.

GBC has taken no notice of local opinion.

GBC has increased the number of houses overall to be built in the Borough

GBC has identified even more sites to be built on in the Greenbelt

The Government requires that use of Greenbelt land should only be done in exceptional circumstances, but SPECIFICALLY says that demand for house is not a good enough reason, so why is GBC still persisting with their ridiculous proposals.

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

I object, as this policy is a downright lie. No Greenbelt land should be lost.
Greenbelt should be protected for the values for which it was created:

Agriculture,
Leisure activities
Tourism
Water catchment
Flood control
Biodiversity
Heritage of nature, landscape views, open spaces
Heritage of historic villages and houses
Parks
Burial grounds
Benefit for public health and wellbeing

Objections have been voiced by thousands of local residents to previous plans and applications for greenbelt development but GBC have ignored, even ridiculed the public and claimed that such a policy is necessary, even desirable, which it is not!

Villages should not be "inset" (what a fatuous, mealy-mouthed, non-sensical word that is) and their greenbelt status lost forever, particularly in West Horsley.

I object to the other 13 villages around Guildford also being inset.

The policy of insetting was arrived at by GBC through a flawed Greenbelt and Countryside policy which was commissioned without the Councillors consent.

I object to the Village envelopes (boundaries,) being enlarged in order to develop large tracts of greenfields and woodland, as proposed by GBC in West Horsley at Manor Farm, land opposite Greta Bank on East Lane and at Waterloo Farm or land adjoining Bell and Colville Garage.

I object to the planned “infilling” of Villages, especially outside settlement boundaries.

I object to the resulting “urban sprawl” which is against NPPF policy.

Development in Villages outside Guildford will result in even more congestion on the approach roads, which are already clogged at commuter and school-run times. People will not cycle or walk from Villages to Urban centres, nor take irregular buses, but will want to drive themselves in cars.

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

Attached documents:
I object to any land that is at present in the greenbelt being designated as suitable for building.

Allowing these areas to be included in the DLP will give the green light to developers to put in applications anywhere they choose, not just on land proposed by GBC.

Indeed, at West Horsley, there is already a proposal by a developer to build on a large, sloping and very visible field at the junction of the A246 and Shere Road, a site which was previously in the 2014 DLP, but had been removed in the latest one.

20,000 objections were sent in to GBC to the 2014 DLP.

GBC has taken no notice of local opinion.

GBC has increased the number of houses overall to be built in the Borough

GBC has identified even more sites to be built on in the Greenbelt

The Government requires that use of Greenbelt land should only be done in exceptional circumstances, but SPECIFICALLY says that demand for house is not a good enough reason, so why is GBC still persisting with their ridiculous proposals.

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

Attached documents:

The key statement in the ‘Green Belt and Countryside Study’ policy-based ‘evidence’ document (in paragraph 4.111) concerning removal of rural villages from the Green Belt is: ‘National planning policy states that only those villages whose open character make an important contribution to the openness of the Green Belt should be included in the Green Belt.’ The assessment of whether the villages have an open character to make an important contribution to the openness of the Green Belt was made principally by Pegasus Planning Group (whether under covert direction from GBC or not is...
unknown) in the ‘Green Belt and Countryside Study’. Pegasus of course are not ‘local people’ wishing to ‘shape their surroundings’ as they see fit; rather they are a remote business, making money from lucrative council contracts. They have rather cornered the market in studies such as this, commissioned by councils trying to react to central Government diktat: this shows in their output.

Nowhere in the GBCS Summary document is the first sentence on the Green Belt policy reproduced: ‘The Government attaches great importance to Green Belts’. No weight has been given in these documents to this fundamental Government sentiment about the Green Belt. It is obvious that any importance that GBC or Pegasus Planning Group attach to the Green Belt is not ‘great’. Instead the documents’ recommendations are predominantly evasions of this sentiment, finding intricate and even artificial ways of justifying its lack of concern. In addition nowhere in GBCS Summary or briefing note that commissioned the GBCS does the word ‘permanence’ appear: this is an essential characteristic of the NPPF policy on the Green Belt. So the claim in the title of Appendix IV of GBCS that it is ‘in accordance with the NPPF’ is fallacious.

Rather than protecting the permanence and openness of the Green Belt, the paramount objective of the GBCS is finding areas to develop. Indeed the key requirement of the study as identified in the briefing note from GBC was: 2.1 The Green Belt and Countryside Study must:

Provide a robust, independent assessment of Guildford Borough’s Green Belt and Countryside beyond the Green Belt with a view to potential release for development purposes in the longer-term, should this be necessary within the GDF plan period - 2006-2026 (and up to 2031), identifying realistic sustainable location(s) for green field release.

If the PDAs identified by this study are retained in the finalised Local Plan, they will be early targets for development because of the high house prices that can be imposed. The 'finger' of urban development that is currently extending through the Green Belt from London south-westwards via Epsom, Ashtead, Leatherhead, and Bookham towards Merrow and Guildford would be more densely formed. In partnership with the parallel 'finger' of development through Kingston, Walton, Weybridge, Byfleet to Woking a double barrier to circumferential continuity of the Green Belt in its SW corner is rapidly and inexorably being created. In addition to the loss of unspoilt landscape that is valued so highly by so many (not only those who live within the Green Belt), it is well-known that continuity of the countryside is of vital importance to the flourishing of wildlife.

For PDAs in and around urban areas, GBCS used the following screening criterion for whether a site was safe from bulldozers: at least 3 out of 4 of the purposes of the Green Belt, listed on page 19, paragraph 80 of the NPPF, need to be met (the encouragement 'to recycle urban land' was considered a common purpose at all sites and therefore not used in the assessment; i.e., actually, 4 out of 5 purposes need to be met). Meeting only 1 or 2 of the 4 purposes doesn't count for anything in this study. But the NPPF states that ‘The Government attaches great importance to Green Belts’ and does not give any indication that the purposes of the Green Belt can be scaled in this fashion. The Government’s attachment of importance is absolute, not gradational depending upon the number of purposes served by parts of it. If a plot of land within the Green Belt serves only 1 of the 5 purposes, then it is making an important contribution to it. Conversely, to dismiss even 1 of the purposes that a plot of land currently meets in the Green Belt is to dismiss the importance that the Government places on the Green Belt, and would be inconsistent with the NPPF. The short-sighted, objective-enabling, unilaterally-decided exercise undertaken by Pegasus is almost certainly not going to maintain the permanence of the Green Belt for the future, particularly with regard to the purpose 'to assist in safeguarding the countryside from encroachment'.

However, even that gradation of purposes proved too lenient for the rural villages; too many sites would escape development. So even sites that served 3 or 4 Green Belt purposes (out of 4) were given more exacting criteria. To determine the potential suitability or appropriateness of each village for insetting within the Green Belt (or perhaps to meet GBC’s requirement that enough villages should be inset), a three stage assessment was devised. Those 3 stages deserve further detailed discussion.

Stage 1: Assessing the degree of openness within each village through analysis of urban form, density and the extent of developed land

Key to the recommendations made as to whether rural villages should be dismissed from the Green Belt or not is paragraph 86 of the NPPF, which states:

‘If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt.’

Pegasus have assessed ‘openness’ of the villages ‘through analysis of the urban form, density and the extent of developed land’. Pegasus have unilaterally decided to assess the openness of a village’s character in their ‘professional judgement’. But given that there is no official definition, ‘openness’ can be assessed equally well by any person, professional or lay in
is an issue of judgement about the importance of openness in and around the rural villages to the openness of the Green Belt, or the settlement. This is not a question of policy, changing with the political wind or economic cycle; it was permitted in 2003 within the settlement area so as not to cause detriment to the character of the countryside or the settlement, then major development within the settlement area at any time must still cause detriment to the character of the countryside or the settlement. Hence, if boundaries of settlements were drawn in 2003 to limit development to where it was capable of accommodating limited development without detriment to the character of the countryside or the settlement. In defining settlements, the boundaries have been drawn to limit the areas in which development may take place to those parts of the settlement where it will conform to the purposes of the Policy, that is to say it will not affect the scale or appearance of the village or impinge on the openness of the Green Belt. The Policy does not envisage extension of the built up area of the settlement beyond the defined boundaries or other than very limited development taking place within settlements.

What has changed since 2003? Remember that at issue now is whether the openness of the rural villages is important to the openness of the Green Belt. So, if boundaries of settlements were drawn in 2003 to limit development to where it would not impinge upon the openness of the Green Belt, then transgressing those boundaries with development at any time must still impinge upon the openness of, and therefore harm, the Green Belt. Similarly, if only limited development was permitted in 2003 within the settlement area so as not to cause detriment to the character of the countryside or the settlement, then major development within the settlement area at any time must still cause detriment to the character of the countryside or the settlement. This is not a question of policy, changing with the political wind or economic cycle; it is an issue of judgement about the importance of openness in and around the rural villages to the openness of the Green Belt.
Belt. The judgement, accepted by GBC and all stakeholders in the Local Plan in 2003, cannot be gainsaid now by a few Pegasus 'professionals' using dodgy definitions and dodgy statistics. Nor can 'rural villages' in 2003 come to be called 'urban areas' within a decade, even if it suits the purpose of meeting nominal housing targets.

Also relevant from the 2003 Local Plan is:

3.36 The Green Belt has provided significant benefits to Guildford Borough, with long-term protection of the Borough's countryside and rural villages from inappropriate development. It also stops the outward spread of London and contributes to regional policy for the South East seeking to redirect development pressures to the eastern part of the region.

If the Green Belt has provided those significant benefits in the past, weakening it now will reduce those benefits, particularly in terms of protection of the rural villages from inappropriate development.

The sentiments of policy P2 regarding those parts of the Green Belt that are left after its diminution by insetting villages are fine, as far as they go, but are also too weak. Also remember that development of the rural villages, visible from the remaining Green Belt from many vantages (e.g. West Horsley from Sheep Leas and nearby locations in the North Downs) will harm the open character of the Green Belt. It is obvious that expansions of settlement areas that encroach on previous Green Belt have no real natural boundaries in practice; no more so than current boundaries. There is therefore no reason to trust that further encroachment will not be made onto the Green Belt as the iterative circle of development, inward migration, joining of immigrants by extended families, greater need for more housing and jobs, further development etc. spirals out of control, and the ‘finger’ of development from the NE to Guildford and beyond is completed.

The provisions of the policy should give stronger protection to the Green Belt. There is too much ‘wriggle room’ for developers to work around in the current proposal.

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

Attached documents:

**Comment ID:** pslp171/1205  **Respondent:** 8672993 / Kes Heffer  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

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

2) I object to the refusal of GBC to take proper account of the Green Belt Despite more than 30,000 objections to the 2016 draft Local Plan, GBC persists with its policies of removing villages from the Green Belt (“insetting”) and with directing the majority (56.7%) of development to the Green Belt. The retained relaxation of planning constraints implied by removing villages from the Green Belt will lead sooner or later to infilling and the villages becoming small dense towns, thereby providing a self-perpetuating and accelerating pressure towards further expansive growth. Despite all the concern expressed about the damage that will be visited upon the Green Belt by the draft Local Plan, no revision has been made to the ‘Green Belt & Countryside Study’ commissioned from the development biased Pegasus Planning Group. Note that the 1.32% p.a. compound growth of housing in Guildford Borough, mainly in the Green Belt, envisaged in the draft Local Plan will lead to a doubling of the house numbers in the Borough within 2 generations, 50 years; and an increase by an order of magnitude (i.e. a factor of 10) in only 7 generations. Recall the original definition of sustainable development accompanying the NPPF: achieving growth while “ensuring that better lives for ourselves don’t mean worse lives for future generations”. There is no limit on the number of generations that is to be considered in this premise. The importance of the Green Belt[5], despite fine words, has been underplayed in this draft Plan: the lives of future generations will certainly be worse than ours if this draft Plan is enacted.


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

**Attached documents:**
We have been looking at the latest version of the Local Plan issued on 6 June 2016 in relation to the fields behind Shalford Village Hall and are very concerned as it could adversely affect the Bowling Club, which is somewhat unique in Surrey because of its artificial playing area. The Plan removes the fields from the Green Belt and puts them in the Shalford Settlement Boundary. This appears to remove the current long established Green Belt protection these fields have and would encourage the developer who has an option on the land to submit housing development proposals with access from Chinthurst Lane.

It is noted that the Plan does reserve these fields for "Open Space" but we have been advised that the wording on the Shalford plan is not clear and in any event is not as strong as its current Green Belt status so it could be open to challenge. It is understood that the Borough Council shares the local community's view that the fields should not be developed and as we see it, this would be best met by retaining this land in the Green Belt with its additional AGLV protection.

The Bowling dub was established in 1999 when the area was developed and the bowling green, two additional tennis courts and the smaller hall were added. The bowling green itself is unusual in that it is built and played on artificial turf. This enables bowling to continue throughout the winter which of course is not possible on natural grass greens and is very popular with members coming from all parts of Surrey to enjoy it. These fields rise up 32 feet from Kings Road and are over 25 feet above the Village Hall. Any development would be clearly seen from the Village Common and could dominate the bowling green and tennis courts and would take away the lovely open backdrop to the playing area which the players fully appreciate as do each year the many hundreds of users and visitors to the Village Hall.

The gift by the late E. C. Wigan in 1962 of the land for the main Village Hall building was made for the use of the inhabitants of Shalford and the neighbourhood "for use for meetings ...... and other forms of recreation and leisure-time occupations with the object of improving the conditions of life for the said inhabitants". The Village Hall site and the open space around it has been known and loved by many residents for over 50 years. The facilities offered in the Halls, the tennis courts, the bowling green and open space are a significant amenity value and are important in providing an attractive setting for the village. There is a real possibility that the recreational facilities could be expanded in the future: for example adding more tennis courts. We are very anxious to keep these options open and retain the site benefits for future generations.

In summary the proposed Green Belt boundary is in the wrong place by enclosing these fields on the edge of the village within the built up area of Shalford. Only a small adjustment to the 2003 boundary plan is necessary to reflect the 1999 development behind the Village Hall and thus keep its Green Belt status. Your full and sympathetic consideration to this objection will be appreciated by all users of the Village Hall.

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

Attached documents:
Pollution in London and its adverse effect on children is a fact. The Green Belt provides the lungs of London and must be preserved.

Far too many houses are proposed for the Horsleys.

The Local Plan does not adequately provide associated infrastructure as indeed much needed present improvements let alone new for this area.

Councillors must not be influenced by developers offering for example "a school extension if you grant huge house development near by. Each planning application should stand or fail on its own merit. Do not fail those you represent. Bring genuine foresight and our concerns forward.

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

**Attached documents:**

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**Comment ID:** pslp171/562  **Respondent:** 8675937 / J. L Morgan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

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

I object to:-

a) the extension of the settlement boundaries of the Horselys into GreenBelt;
b) the removal of extended village areas from Green Belt;
c) the original and remaining proposed large developments in Green Belt land, most especially that for the former Wisley Air Field.

The Green Belt was created to provide the lungs of London and to safeguard near by villages forests and farmland. Such green spaces are needed more than ever today. This generation must not thwart that important principle to line the pockets of developers. Heed these of all other objections and safeguard greenery.

P.s You are there to represent our view so please do so.

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

**Attached documents:**

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**Comment ID:** PSLPP16/16569  **Respondent:** 8680609 / Andrew Jackson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

I object to the proposed alteration of the Shalford Green Belt and Settlement Boundaries. They appear to be the simplistic drawing of straight lines for no apparent reason other than the cutting of corners and the saving of the draughtsman's ink. There are three areas of considerable concern to me.

1. The small triangle area of Chinthurst Lane, opposite Granary Cottage, lying within the Site of Nature Conservation Interest. It is Common Land (except the actual Highway); it cannot be built upon, so is not "ripe for development". There is therefore no need to exclude it from the Green Belt or bring it within the Settlement Boundary.
1. The area of land, currently Open Space, to the rear of the Village Hall complex but accessed from Chinthurst Lane. This is the highest ground in Shalford Village. If it is excluded from the Green Belt status which it currently enjoys, it will immediately become the subject of planning applications for development. Any house or houses will completely dominate the skyline when viewed from nearly anywhere within the village. Any house(s) built on this land would completely overlook all the surrounding houses and it would not be possible to screen them. The access from such dwelling(s) would have to be onto Chinthurst Lane, a narrow road without footways for much of its length and a "rat-run" for rush hour traffic trying to avoid Rices Corner or Bramley and the queues to the Shalford Roundabout.

The Council makes much of the need for affordable housing. No potential developer of this site will be prepared to provide such housing. The area is not big enough to build for profit and to provide houses in sufficient number which are small enough to be “affordable” and the density would be out of keeping with the area.

1. The triangle of land behind Christmas Hill. This is totally land locked, accessible only from adjoining property, a footpath or Common Land. It is quite unnecessary to bring that corner within the Settlement Boundary and exclude it from the Green Belt. It creates the suspicion that the Council has a hidden agenda. for this area. Much is made of the need for transparency. The council should make the reasons for this inclusion clear.

All this land falls within the Area of Great Landscape Value for which there is a current proposal for its inclusion within the existing adjoining Area of Outstanding Natural Beauty. The Council has backed this proposal so it is contrary to the Council's own policy to now seek to exclude these areas from that proposal.

I strongly believe that these areas should be protected from development.

It is essential that Shalford remains WITHIN the Green Belt. It is so close to Guildford that removal of Green Belt status would mean the rapid progress toward a joined-up conurbation when a buffer is really what is needed.

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

Attached documents:

Comment ID: PSLPP16/16573  Respondent: 8680609 / Andrew Jackson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

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It is essential that Shalford remains WITHIN the Green Belt. It is so close to Guildford that removal of Green Belt status would mean the rapid progress toward a joined-up conurbation when a buffer is really what is needed.

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

Attached documents:

Comment ID: PSLPP16/1199  Respondent: 8686913 / John and Susan Burge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

1. How can the Council remove Green Belt protection from villages and then expand the villages’ settlement boundaries whilst at the sametime stating “We will continue to protect the Metropolitan Green Belt”. How much more contradictory can these two statements be? And where is the “exceptional circumstances” to build new houses on the Green Belt?

I OBJECT to the destruction of the Green Belt without evidence of need.

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

Attached documents:

Comment ID: PSLPP16/1542  Respondent: 8687041 / Michael Aaronson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

I OBJECT to the cavalier approach to Green Belt protection revealed by this Policy. It flies in the face of manifesto commitments made when this Council was elected. The insetting of 14 villages from the Green Belt, the proposal to allow infilling within a further 12 villages within the Green Belt, plus the proposed extensions to the settlement boundaries of 11 more villages - allowing even more infilling there - will amount to a gradual erosion of the Green Belt and a degradation over time of the character of the villages concerned. The Green Belt makes a vital contribution to our well-being and deserves stronger protection. The villages are an essential part of it.

Specifically with regard to Normandy and Flexford, the settlement boundary proposals will need to be revisited when Policy A46 is withdrawn from the Plan (see separate submission) and if there is to be any change to the existing
boundaries that will need to be the subject of further public consultation, as it is not possible to see from the existing proposals where they would lie in the absence of Site A46.

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

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POLICY P2 – Green Belt

I OBJECT. This policy states, “the general extent of the Green Belt has been retained.” This is a lie.

The policy wording is tepid in support of the Metropolitan Green Belt even though the latter forms 89% of the borough and should be the cornerstone of all local planning policy. It is precious beyond the short-term demands of the present Government’s policy or a 15-year local plan. As noted under Policy S1 above, it is a solemn legacy to future generations – an asset and amenity that belongs as much to Londoners and the whole nation as to the people who live in it. It is an inalienable public good. Once gone it is gone forever. It is not the Council’s to give away.

Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. Building on it involves high opportunity costs, including an irreversible loss of:

- Agricultural production
- Rural leisure and tourism amenities
- Water catchment
- Flood control
- Biodiversity
- Natural heritage
- A carbon sink for air pollution
- Room for public facilities such as parks and burial grounds
- Profitable film locations (e.g. Shere)
- Future economic potential such as mineral extraction (even fracking)
- Natural beauty, landmarks, open space, rural views and sight lines
- Benefits to public health and wellbeing, physical and psychological (as well expressed in the NPPF)8

As a matter of law, morality and national and local policy, these assets should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultations.

It is disreputable to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold. No-one argues that we should sell 1.6% of the Crown jewels in order to build houses.

I am not opposed to appropriate development in the Green Belt and recently supported a major planning application in my own village. But I fail to see why a system of fair burden-sharing of new development cannot be applied to the borough’s existing settlements in proportion to their size. This alternative would minimise the strain on infrastructure and maximise the chances of retaining the character of each settlement through gradual growth. It is reasonable to ask urban Guildford, with x times the population of semi-rural East Horsley for instance, to accommodate x times the number of
new homes over the plan period. Parish councils could be asked, and will no doubt be willing, to propose where their quota of houses should go. Most rural residents are reasonable people who, if not alienated by top-down planners, will support realistic numbers of new houses in their neighbourhoods. Unfortunately, this democratic, bottom-up approach has not been attempted.

Instead, while developers flip and land-bank urban sites as a financial speculation, this plan will dump most new development on greenfield sites where building costs are lower, covering the Green Belt with dozens of housing estates that few residents want. 8,086 new houses are planned for the Green Belt but only 1,135 for Guildford urban area. This is disruptive, socially inequitable and unnecessary. It will not only destroy countryside but will also delay and disincentivise much-needed urban regeneration. The remarkable revival and repopulation of central London shows that building dormitory satellite settlements is an out-of-date approach to planning.

I particularly protest at the “insetting” of 14 villages from the Green Belt, and at “infilling” 12 of the borough’s Green Belt villages. I am deeply disturbed that settlement boundaries are to be hugely extended in many villages and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are “leggy” in outline, reflecting the effect of ribbon development (often along just one side of existing roads) permitted between the Wars. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost hellbent on self-defeat.

I believe this policy is based on a flawed Green Belt and Countryside Study that, according to one Conservative Councillor, was irregularly commissioned by Council officers without the authority of Councillors. To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, although they would quickly destroy them if the proposed “insetting” and boundary extensions go ahead. This policy is wildly disproportionate in terms of any foreseeable development need (especially post-Brexit) and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

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

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I OBJECT to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development, however, it
does identify the principle of development and uses.” This ignores the tens of thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. This amounts to a war of attrition by the Council in conjunction with developers, since many busy residents are sick and tired of repeating the same comments to deaf ears. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. 13 Some residents have concluded that commenting is a waste of time.

13 Further discredited by criminality on the Council. Former lead Councillor for planning Monika Juneja, architect of the 2014 draft plan, is currently serving a two-year sentence on 3 counts of forgery, pretending to be a barrister and obtaining dishonest pecuniary advantage.

All Green Belt sites should be removed from the plan until “exceptional circumstances” for development are proven, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established.

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

Attached documents:

Comment ID: PSLPP16/1033  Respondent: 8692865 / Stuart Walker  Agent:  

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I wish to object to the above mentioned proposed boundary change.

This land contributes to the open character of this area of the village any change of usage i.e. development would tower over the village.

Chinthurst Lane is quite unsuitable to take more traffic being already burdened by people using it as a 'rat run' at certain times.

These boundaries have been there for many many years and I can see no valid reason for changing them.

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

Attached documents:

Comment ID: PSLPP16/2621  Respondent: 8693153 / Vicki Willetts  Agent:  

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY P2 (GREEN BELT): • No declaration of support for protecting the Guildford Green Belt, contrary to NPPF and government statements. • No evaluation of value of local Green Belt as a public and private asset: it’s just treated as potential building land with a few inconvenient restrictions. • Impact of Green Belt development on local agriculture ignored. • Impact on rural leisure and tourism ignored. • Impact on flood control ignored. • Impact on carbon sink and knock-on effects for air pollution and climate change ignored. • Impact on biodiversity ignored. • Impact on natural heritage ignored. • Impact on water catchment ignored. • Impact on room for public space amenities (parks, cemeteries, waste facilities etc) ignored. • Impact on rural business (e.g. mineral mining, film making) ignored. • Impact on natural landmarks and views ignored. • Harm to public health and wellbeing (physical, psychological) ignored. • Allows excessive levels of development in breach of views expressed in last consultation and Conservative Party manifesto commitments at the last local elections. • Has allowed ruling Councillors to argue that there is an acceptable
percentage of Green Belt that should be sacrificed to development, when no such rule exists in the NPPF. 
• Ignores alternative approaches, such as fair burden-sharing under which settlements would undertake to accommodate new development in proportion to their size. 
• Disproportionate amount of development (most of it, in fact) to be in Green Belt. Too few new homes in urban areas where most people (especially the young and less privileged) want to live. This will act against much needed urban regeneration. 
• “Insetting” of most villages disproportionate and unjustified in terms of their contribution under the NPPF to the purposes of the Green Belt. Based on flawed Green Belt and Countryside Study. Idea that most Guildford villages do not contribute to “openness” is subjective. 
• Major settlement extensions allow indiscriminate housebuilding, as irregularly shaped villages are squared off to enclose green fields. 
• Overall harm to Guildford Green Belt unjustified by any objective development need post-Brexit. 
• Ignores most of NPPF 17 stipulations.

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

Attached documents:

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As noted in the Plan a large proportion of the borough is designated greenbelt; NPPF requires that greenbelt boundaries are amended in exceptional circumstances. I do not believe that meeting additional housing need when brownfield sites and limited local infilling is available within the borough, can be considered as exceptional. The function of the green belt, as defined by the NPPF is to check the unrestricted sprawl of large built up areas; to prevent neighbouring towns merging into one another; to assist in safeguarding the countryside from encroachment; to preserve the setting and special character of historic towns and to assist in urban regeneration by encouraging the recycling of derelict and other urban land.

Removal of West Horsley from the greenbelt will allow the village to sprawl into the countryside, further exacerbate the merging of East Horsley and West Horsley North encroaching on settlement boundaries, the developments will encroach on the surrounding countryside, the character of the villages will be significantly altered and the recycling of available derelict land will not be encouraged.

Insetting the village of West Horsley (North and South) cannot be considered to be in accordance with Policy P2. The development sites proposed can not be considered as “limited infilling” given the substantial increase in village size that will result from the proposed development sites.

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

Attached documents:

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Paragraph 83-89 of the NPPF clearly state that alterations to the greenbelt are only permissible in exceptional circumstances, subsequent parliamentary directives issued to councils have confirmed that meeting housing targets cannot be considered as ‘exceptional’. The plan specifically states that only villages whose character make an important contribution to the greenbelt should be included in the green belt; the number of walkers and cyclists passing through West Horsley is a clear indication of the character of the village as a whole.

I would like to note that I am not opposed to sensitive localised small scale housing within the existing settlement boundary of West Horsley, I also appreciate the need for villages to grow in order to retain vitality and viability, however...
the 100% increase in the number of homes proposed to the northern end of the village cannot be considered as localised infill and doubling the density does not respect the character and appearance of the existing village.

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

Attached documents:

Comment ID: PSLPP16/3570  Respondent: 8694785 / Nicolas Dixon  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I have now had an opportunity to look at some of the issues ensuing from the New local plan and would like to mention the following matters.

I note that the council appears to have unilaterally decided to remove large parts of the area around the horsleys from the Green Belt, following which it is proposed to allow the building of some 450 houses within a radius of approximately one mile of my house, together with another 90 houses further affield.

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

Attached documents:

Comment ID: pslp171/1348  Respondent: 8697025 / Barry Pearce  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

My objection is based upon the fact that after the 2016 Consultation it does not go far enough in reducing the still very large number of new dwellings proposed on the Green Belt. It is also totally unacceptable that Guildford Council is choosing not to constrain its overall housing growth as many other Councils have done to protect the Green Belt. Nothing has been put forward since last year's Consultation to improve the sustainability of the West Horsley development sites and therefore meet National policy requirements. Every home on the West Horsley sites will need at least one car to get to the shops, Medical Centre, and Horsley Station which are already over subscribed, with flawed evidence being relied upon to justify over expansion. Finally I wish to object to no changes being proposed since the 2016 consultation to insetting West and East Horsley from the Green Belt.

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

Attached documents:

Comment ID: PSLPP16/110  Respondent: 8699809 / Holmwood Close Residents Association (Liz Drew)  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( No ), is Legally Compliant? ( )

The removal of these villages from the greenbelt will take away the open spaces that define these areas and lead to villages merging and becoming one urban sprawl. It is vital that the semi rural villages are kept as this defines Surrey and the guildford area.
It is also not sound to plan increases in the populations of these villages without also expanding infrastructure. The local schools, doctors and roads are all crowded and over subscribed. This plan is not viable.

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

Attached documents:

Comment ID: PSLPP16/3413  
Respondent: 8703585 / N J Axten  
Agent:  

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

I object to the removal of villages from the Green Belt.

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

Attached documents:

Comment ID: PSLPP16/6146  
Respondent: 8703585 / N J Axten  
Agent:  

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

GBC has cynically removed villages from the Green Belt in order to be able to say that they are complying with central government guidelines not to develop on Green Belt areas.

What are the exceptional circumstances that can be applied to the proposed development areas?

Stop trying to confuse people with ridiculous questions about legal compliance and get to the point ie. Housing numbers and the effect on the local community.

It is also absurd to have two pages of this questionnaire the same – pp. 7-9.

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

Attached documents:

Comment ID: PSLPP16/4076  
Respondent: 8704417 / Philip Ashfield  
Agent:  

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

I was under the impression that the Councillors had previously stated in their Manifesto that “the Green belt is safe”. It now appears that these words were totally meaningless and untrustworthy.

Councillors and planning officials have no right nor lawful reason to turn prime Greenfield land into an enormous urban sprawl/slum stretching from Greater London to Guildford and probably further out.

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

Comment ID: PSLPP16/11498  Respondent: 8706625 / Hilary Barker  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

I OBJECT strongly to GBC’s plans to concrete over Green Belt land.

Guildford is made up of 89% Green Belt forming part of the Metropolitan Green Belt which was set up to:

NPPF paragraph 79 quotes “The Government attaches great importance to the Green Belt. The fundamental aim of the Green belt policy is to prevent urban sprawl by keeping land permanently open: the essential characteristics of the Green Belt are their openness and their permanence.

NPPF paragraph 80 The Green Belt serves 5 purposes:

• To check the unrestricted sprawl of large built up areas
• To prevent neighbouring towns merging into one another.
• To assist in safeguarding the countryside from encroachment.
• To preserve the setting and special character of historic towns.
• To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

NPPF 83 states that:

• “Once established, Green Belt boundaries should only be altered in “exceptional circumstances”
• “Inappropriate development is by definition harmful to the Green Belt and should not be approved except in very special circumstances”

Can GBC demonstrate these “exceptional” or “special” circumstances?

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

Attached documents:

Comment ID: PSLPP16/16  Respondent: 8707553 / Stuart Farquharson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

1. The plan to develop greenbelt is disgusting. Its a sad and desperate attempt by the Conservative led Council to appease their Whitehall bosses who have failed to tackle immigration. Over population is leading to this requirement for more housing. The loss of natural habit will never be replaced. Offsetting new area of green for those lost is will never workout. How can you replace centuries old greenbelt with new greenbelt zones. The lack of understanding by our Councillors in that regard is deeply disturbing. Below are quotes from local Councillors at the recent plan meeting:

Cllr Goodwin (con) said he didn't know what all this fuss about airpollution was all about

Last night Angella Gunning said I don't see why ancient Woodland should be protected, after all they are old.

Its deeply disturbing that these people have such a lack of awareness of such key issues.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11227  Respondent: 8708289 / Frances King  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

Green Belt: I OBJECT to the insetting of 14 villages from the Green Belt, the infilling proposed and the adjustment of the settlement boundaries in a number of other villages. This effectively gives a free for all to developers in those villages. The Green Belt was introduced to provide a lung round the London Metropolitan area. Guildford’s plan to put 8,086 new houses in that lung destroys its whole purpose. The claim that only 1.6% of the Green Belt in the borough is a manipulation of the figures as it ignores insetting, infilling and settlement boundary extensions. It merely tries to put a good light on a disreputable policy. The "exceptional circumstances" required to take this action have not been demonstrated in the proposed Plan, which ignores far more suitable brownfield sites in the urban part of the Borough.

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

Attached documents:

Comment ID: pslp171/2405  Respondent: 8708289 / Frances King  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

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

Green Belt

I object to the claim that West Horsley and a further 13 villages are "now inset in the Green Belt" under Green Belt Policy P2 (4.3.13).

Guildford Borough Council merely proposes that this should happen. The villages remain in the Green Belt until a decision on the proposal by the Inspector. The wording in your document is incorrect.

I object to there being no changes are being proposed since the 2016 consultation to the insetting West Horsley and the further 13 villages listed.

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

Attached documents:

Comment ID: PSLPP16/15018  Respondent: 8708545 / Nigel Wicks  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

I object to not protecting the Green Belt (Policy P2)
This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. It is meretricious to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 states that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt.

No evidence is put forward to suggest that this balancing exercise has been done. The Countryside Study does not meet the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt., nor carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. Each of the identified Green Belt sites proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is implausible, given the borough’s location on the edge of Metropolitan London.

In addition I object to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch and so provides no evidence base to support inclusion of this site. Nor was there adequate public consultation before that site was included in the proposals.

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

Attached documents:
comments the Council have received about individual sites since the Issues and Options consultation in 2013. The plan has not changed materially since the Council received 20,000 objections to its first draft plan in 2014. There is scant evidence that the Council has given thorough consideration to the constraints, particularly the lack of infrastructure. Nor is evidence put forward that exceptional circumstances justify development on green field sites.

The housing needs assessment is flawed in various respects and overstates housing need. In addition, since it was produced, the Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should consider constraints before determining the housing number.

Even if having properly applied constraints, specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done.

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

Attached documents:

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Comment ID: PSLPP16/4496  Respondent: 8709249 / Geoff Spink  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

1. POLICY P2

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt sites proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and
nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

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

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

1. SITES - POLICIES A1 TO A57

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. **The plan says that “allocating these sites does not grant planning permission for development.”** However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

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

**Attached documents:**
• Impact on carbon sink and knock-on effects for air pollution and climate change ignored.
• Impact on biodiversity ignored.
• Impact on natural heritage ignored.
• Impact on water catchment ignored.
• Impact on room for public space amenities (parks, cemeteries, waste facilities etc) ignored.
• Impact on rural business (e.g. mineral mining, film making) ignored.
• Impact on natural landmarks and views ignored.
• Harm to public health and wellbeing (physical, psychological) ignored.
• Allows excessive levels of development in breach of views expressed in last consultation and Conservative Party manifesto commitments at the last local elections.
• Has allowed ruling Councillors to argue that there is an acceptable percentage of Green Belt that should be sacrificed to development, when no such rule exists in the NPPF.
• Ignores alternative approaches, such as fair burden-sharing under which settlements would undertake to accommodate new development in proportion to their size.
• Disproportionate amount of development (most of it, in fact) to be in Green Belt. Too few new homes in urban areas where most people (especially the young and less privileged) want to live. This will act against much needed urban regeneration.
• “Insetting” of most villages disproportionate and unjustified in terms of their contribution under the NPPF to the purposes of the Green Belt. Based on flawed Green Belt and Countryside Study. Idea that most Guildford villages do not contribute to “openness” is subjective.
• Major settlement extensions allow indiscriminate housebuilding, as irregularly shaped villages are squared off to enclose green fields.
• Overall harm to Guildford Green Belt unjustified by any objective development need post-Brexit.
• Ignores most of NPPF 17 stipulations.

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

Attached documents:

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Comment ID: PSLPP16/4742  Respondent: 8711841 / Rosmarie Roberts-Kunz  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

SITES

I OBJECT TO ALL POLICIES INVOLVING BUILDING IN THE GREEN BELT:

• No “exceptional circumstances” are shown and numbers, numbers are excessive and the clearly expressed views of residents in previous consultations are ignored.

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

Attached documents:

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Comment ID: PSLPP16/163  Respondent: 8713889 / Joyce Campbell  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

As a resident of East Horsley for nearly 30 years, I am horrified at the latest attempts to build more than 500 houses in the Horsleys and to further erode the existing Green Belt.
The introduction of Green Belt land in the 1950’s was to stop the spread of urban sprawl. It is particularly important in the South East to prevent the Greater London conurbation from spreading further into the surrounding countryside. A look at a map will show that further urbanisation would soon join it to areas such as Guildford and Woking and Redhill and Reigate to the south. There must be plenty of brownfield sites which could be developed. Even though this might be more costly at the outset, in the long term it would have many advantages.

The M25 should be allowed to be a natural barrier between the built-up areas and the countryside. For those people who live in busy towns, the opportunity to get out into the countryside for recreation and relaxation is vital to their health and well-being, although I understand that air quality around Junction 10 of the motorway is comparable with that in Central London.

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

Attached documents:

Comment ID: PSLPP16/3989  Respondent: 8713921 / Jenny Bywater  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

I object to the alteration of the green belt boundary in Shalford. Shalford is a village with a wonderful open ambience. The land behind the Village Hall contributes to the open character of the village and should be preserved. Also the elevation of the land is 32 feet above King’s road which would make any housing development unsightly and out of keeping with neighbouring properties and tower over the village community facilities. Access to this land is via Chinthurst Lane, which is already a heavily congested country lane.

The boundary has been its current place for a long time and there is no valid reason for change. Guildford Borough Council should support the expressed views of the local residents and protect the fields from development.

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

Attached documents:

Comment ID: PSLPP16/955  Respondent: 8714145 / Catlin Pearl  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

I strongly object to further plans to destroy our Green Belt. We had 700 residents sign a petition against this only last year. Apart from destroying this English village how can you possibly consider Chinthurst Lane as as access? It is already an extention of Shalford Station Car park and a thorough danger as it is narrowing daily due to overuse by railway users, making passing other vehicles impossible to pass each other.

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

Attached documents:

Comment ID: PSLPP16/839  Respondent: 8714305 / Dereca and John Trevail  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
GUILDFORD PROPOSED LOCAL PLAN 6/6/2016

FIELDS BEHIND SHALFORD VILLAGE HALL

As a resident of Shalford and a member of Shalford LTC I wish to make known my objections to the current version of the local plan which removes the fields behind the Village Hall and Tennis Club from the Green Belt and puts them in the Shalford settlement boundary.

Although these fields have been classified as “open spaces” there is no explanation or confirmation to say that this would give them the same degree of protection as the Green Belt from housing development.

Any Construction on these fields which are 25ft above the village hall would tower over the tennis courts and bowling green and totally destroy the Green lung of the village.

The considerable traffic from a development would have to exit on Chinthurst lane not only adding to the traffic chaos and pollution but increasing the potential for an accident.

We believe that any construction in this field would exacerbate the current flooding that the tennis courts and the village hall suffers in heavy rain.

By implementing a small adjustment back to the 2003 boundary GBC could protect these fields and ensure they remain open spaces.

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

Attached documents:

Comment ID: PSLPP16/9535  Respondent: 8715777 / John Sansom  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the removal of villages from the Green Belt.

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

Attached documents:

Comment ID: PSLPP16/2607  Respondent: 8717697 / Michael Henderson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- The Local Plan Policy central theme is that “we will continue to protect the Metropolitan Green Belt (MGC)“ and yet there are several instances in the Plan which completely flout this statement. A detailed study of the plans show that nearly 9,000 new homes (65% of the proposed developments) are to be built on land currently within the MGC which destroys the central tenet of the Local Plan. This is a deceitful statement and brings no credit to the authors of the GBC Local Plan.
• I have lived in East Horsley for 44 years and can see no good reason why as a Rural location it’s Green Belt status should not be preserved. I object strongly to the proposal that East Horsley should be “inset from the Green Belt” as it clearly both in the past and currently makes an important and continuing contribution to the openness of the Green Belt. Driving down the B2039 lane from the A3 (or for that matter from the A3 to Effingham or the road into East Horsley from Cobham) it is clear you are driving through farmland and countryside before entering the rural village of East Horsley.

I also object strongly (which I have done in a separate detailed letter to GBC) regarding the proposal to remove Wisley Airfield from the Green Belt in order to build further houses which is certainly not a good enough reason to warrant the description of “exceptional circumstances”.

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

Attached documents:

Comment ID: PSLPP16/17062  Respondent: 8717921 / Helen Jefferies  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

• There is no mandate from the electorate to build on the Green Belt – to the contrary the Conservatives who were elected in Guildford without exception stood on a protect the Green Belt I object to the fact that election manifesto promises to protect the Green Belt have not been upheld. Councillors have no mandate from the electorate to justify development of the greenbelt.

• It is clear from the census that building the majority of new housing on the greenbelt will generate almost double the amount of cars than building housing in the urban area. This is unsustainable and I object to greenbelt housing on air quality Residents of GBC will not be prepared to pay the fines for breaches of air quality limits due to the inability and unwillingness of the Council to take the impact of poor air quality on humans and the SPA seriously.

• I object to the draft plan which proposes over 70% of new housing on the This will ruin the countryside for ever impacting both current and future residents.

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

Attached documents:

Comment ID: PSLPP16/11631  Respondent: 8721857 / Andrea Lightfoot  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

This policy states “the general extent of the Green Belt has been retained.” The plan has not done this, at this rate it will be nearly gone in just over 100 years, possibly during the lifetimes of our grand children.

The Metropolitan Green Belt forms 89% of the borough. It is precious beyond the short-term demands of the present Government’s policy or a 15-year local plan. It is a legacy to future generations – an asset and amenity that belongs as much to all Londoners as GBC, have you done your duty to cooperate with all of them, I believe their Mayor has banned building in the Green belt in the London area.

These assets should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is contrary to previous responses to public consultations.

Loss of 7% when insetting, infilling and settlement boundary extensions are included, unacceptable.

Instead say no to land-banking urban sites as a financial speculation.

I strongly object to “insetting” of 14 villages from the Green Belt, and at “infilling” 12 of the borough’s Green Belt villages. I am deeply disturbed that settlement boundaries are to be hugely extended in many villages and that infilling is also proposed outside the settlement boundaries of 11 further villages.

I strongly object to Wisley Airfield site being included, it is not a brownfield site and it completely ignores the SPA influence and the councillors own decision to object to it. Very strange.

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

Attached documents:

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Comment ID: PSLPP16/11650  Respondent: 8721857 / Andrea Lightfoot  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

To the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development, however, it does identify the principle of development and uses.” This ignores the tens of thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. This amounts to a war of attrition by the Council in conjunction with developers, since many busy residents are sick and tired of repeating the same comments to deaf ears.

The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014, commenting is a waste of time.

All Green Belt sites should be removed from the plan until “exceptional circumstances” for development are proven, as stipulated repeatedly in the NPPF. The Green Belt should always be above short-term considerations such as perceived housing need, as the law has established.

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

Attached documents:
The Green Belt is not for swopping. Areas in the West are having new green belt while other areas in the East are having their Green Belt removed, the reason why land nearer to London is more ecologically valuable as Green Belt is as a Green ‘lung’, the further away from the Urban area the less efficient it is in its purpose to curb pollution.

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

Attached documents:

Comment ID: PSLPP16/9055  Respondent: 8723809 / Sally Blake  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to POLICY P2 – Green Belt

• No declaration of support for protecting the Guildford Green Belt, contrary to NPPF and government statements.
• No evaluation of value of local Green Belt as a public and private asset: it’s just treated as potential building land with a few inconvenient restrictions.
• Impact of Green Belt development on local agriculture ignored.
• Impact on rural leisure and tourism ignored.
• Impact on flood control ignored.
• Impact on carbon sink and knock-on effects for air pollution and climate change ignored.
• Impact on biodiversity ignored.
• Impact on natural heritage ignored.
• Impact on water catchment ignored.
• Impact on room for public space amenities (parks, cemeteries, waste facilities etc) ignored.
• Impact on rural business (e.g. mineral mining, film making) ignored.
• Impact on natural landmarks and views ignored.
• Harm to public health and wellbeing (physical, psychological) ignored.
• Allows excessive levels of development in breach of views expressed in last consultation and Conservative Party manifesto commitments at the last local elections.
• Has allowed ruling Councillors to argue that there is an acceptable percentage of Green Belt that should be sacrificed to development, when no such rule exists in the NPPF.
• Ignores alternative approaches, such as fair burden-sharing under which settlements would undertake to accommodate new development in proportion to their size.
• Disproportionate amount of development (most of it, in fact) to be in Green Belt. Too few new homes in urban areas where most people (especially the young and less privileged) want to live. This will act against much needed urban regeneration.
• “Insetting” of most villages disproportionate and unjustified in terms of their contribution under the NPPF to the purposes of the Green Belt. Based on flawed Green Belt and Countryside Study. Idea that most Guildford villages do not contribute to “openness” is subjective.
• Major settlement extensions allow indiscriminate housebuilding, as irregularly shaped villages are squared off to enclose green fields.
• Overall harm to Guildford Green Belt unjustified by any objective development need post-Brexit.
• Ignores most of NPPF 17 stipulations.

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

Attached documents:

Comment ID: PSLPP16/11735  Respondent: 8725697 / J A Ottey  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.
I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

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

**Attached documents:**

Comment ID: PSLPP16/3495  Respondent: 8726529 / Eric Palmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken from the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and
the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

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

**Attached documents:**

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**Comment ID:** pslp171/1709  **Respondent:** 8726689 / David Shaw  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

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

Exceptional circumstances must be demonstrated in order to develop Greenbelt yet despite the weight of public opinion against weakening of this policy, 70% of new housing development will be in the countryside, of which, 58% will be in Greenbelt. By definition, this is not an exception and no attempt is made to demonstrate exceptional circumstances, in line with the requirements of the NPPF. Insetting villages is of concern since restrictions within the settlement boundary raises concerns over loss of character. The Rural Economic Strategy covered in 4.51a, promoting affordable homes everywhere in the countryside including the AONB as a main aim, is a mechanism for promoting overdevelopment in our countryside. It has not been subject to full public consultation and is based on data, which is not up-to-date.

Three major strategic sites – Blackwell Farm, Wisley Airfield and Gosden Hill Farm – are in the Green Belt. Previous consultations show that, in line with the NPPF, the public would prefer to use brownfield land in the urban area first.

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

**Attached documents:**

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**Comment ID:** PSLPP16/931  **Respondent:** 8726721 / Rosemary Mitchell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

The greenbelt must be protected at all costs and I totally oppose any rearrangement of the greenbelt and removal of small towns and villages from it. It has been reasonably successful at stopping the uncontrolled sprawl of our towns and cities but this will not continue if we keep taking land out of it. The time has come to call a complete halt to any change in the green areas around our urban areas.

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

**Attached documents:**

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**Comment ID:** PSLPP16/16760  **Respondent:** 8727105 / Emma Pernet  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I strongly object to any plans to build on existing green belt land. As far as I am aware you need to demonstrate exceptional circumstances to build on the Green Belt. No exceptional circumstances have been submitted and in my opinion the views of a large number of people who objected previously have been ignored.

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

Attached documents:

Comment ID: PSLPP16/12878  Respondent: 8727457 / Nuala Crampin  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy P2 Green Belt

The boundaries of the green belt should not be changed as the reason for the creation of the green belt was to prevent sprawling development which is what this draft plan will give rise to.

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

Attached documents:

Comment ID: PSLPP16/9709  Respondent: 8728161 / Judy Kennedy  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy P2 Green Belt. I object to the misuse of Policy P2: Green Belt and the apparent justification of 'exceptional circumstances' for the removal of Normandy from this policy. GBC's Local Plan appears to be re-writing the green belt policy and choosing to ignore vital historical and contemporary concept of the green belt. Professional planners ignore it at their, and our, peril. The UK is a small, over-crowded land mass with an ever-growing population. The retention of open spaces, wildlife habitats and, most importantly, clear air is not a 'nimby' whim but of survival necessity for rural and urban populations.

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

Attached documents:

Comment ID: pslp171/2146  Respondent: 8728577 / Peter Williams  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the proposed local plan for the following reasons:

1. The reduction in the number of new homes in the Green Belt is not enough. There is still a very large number of new dwellings proposed for construction in the Green Belt.
2. It is proposed that the area to the east of the borough takes an even higher number of dwelling in the Green Belt.

3. Many other councils have chosen not to constrain overall hosing growth to protect the Green Belt, yet Guilford has not. Although the objectively assessed housing target has been reduced since the 2016 plan to 12,466 dwellings by 2034, this still represent a 25% growth for Guilford.

4. Nothing has changed since last year’s consultation to address the sustainability aspects of the West Horsley development sites, as is required by national policy requirements. No matter how much people are encouraged to travel on foot or by cycling, each new home will need a least one car to give access to Horsley station, shops, medical centre, library, etc.; this is easily demonstrable.

5. More apartments are needed in Guildford, not more retail space. The rise of on-line shopping and the reduction in physical shopping is clearly documented and many authoritative reports support that view that the trend will continue.

6. No changes have been made to the proposal to inset both East and West Horsley from the Green Belt. Policy P2 states that the Metropolitan Green Belt will continue to be protected against inappropriate development. I object to the village’s removal from the Green Belt by insetting and extending the 2003 Local Plan Settlement Area boundaries.

7. The overload of local social and physical infrastructure is not addressed. Increased demand for access to medical facilities, schools, station parking, roads, and particularly disposal of waste water remain at large.

I trust that you will take my views into consideration and I would be happy to discuss the matter further with you.

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

**Attached documents:**

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**Comment ID:** PSLPP16/9469  **Respondent:** 8728865 / Neville Bryan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

Object

Greenbelt is not just for us but also for future generations. It is not the Council’s to give away. When it gone it is gone forever. This policy wording is too weak.

I strongly object o building on the greenbelt without local resident support.

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

**Attached documents:**

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**Comment ID:** PSLPP16/16894  **Respondent:** 8728865 / Neville Bryan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

Object

Greenbelt is not just for us but also for future generations. It is not the Council’s to give away. When it gone it is gone forever. This policy wording is too weak.

I strongly object o building on the greenbelt without local resident support.

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

**Attached documents:**
We strongly object to both the change of and insetting of the Wood Street Village boundaries. We also ask you re recheck the Wood Street Village Map as common land is we believe incorrectly drafted in the local plan diagrams.

We believe increased insetting for all the villages should not be necessary as it removes protection from over development.

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

Attached documents:

Comments

Comment ID: PSLPP16/16910  Respondent: 8728865 / Neville Bryan  Agent:

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

Object

We need our greenbelt protected by much stronger wording, as it is under threat from developers. This policy wording is much weaker than previous plans and versions, and it now appears that it is dependent on the Surrey Hills Management Plan which we note welcomes housing development.

Greenbelt needs much more substantial protection. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated.

Greenbelt is not just for us but also for future generations. It is not the Council’s to give away. When it gone it is gone forever.

Any policy on the Green Belt should start with a fair assessment of its value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. It is a National Asset and should be protected in perpetuity. However Policy P2 appears to try to justify excessive development in supposedly protected areas. This is contrary to previous wishes expressed in responses to the regulation 18 public consultation.

This policy is also based on a flawed Green Belt and Countryside Study. Errors reported in the last consultation have not been addressed. The Greenbelt sensitivity study which accompanies the Greenbelt reports is also deeply flawed. Nowhere are the errors more apparent than with area H2, as this area has been recently assessed as high grade greenbelt fitting the criteria for the AONB expansion (see the Land Management Services report June 2016), yet the sensitivity study only rated it as Amber – too convenient as the University and GBC both wish to develop it.

Policy P2 states that “the general extent of the Green Belt has been retained.” This is a misrepresentation as over 6% of the borough Greenbelt is being given away.

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

Attached documents:

Comment ID: pslp171/2048  Respondent: 8729217 / Karen Stevens  Agent:

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

I object to the changes in para (1): “The Metropolitan Green Belt will continue to be protected as shown designated on the Policies Map, against inappropriate development. In accordance with national planning policy, the construction of
new development will be considered inappropriate and will not be permitted unless very special circumstances can be demonstrated.”

The words “as shown designated on the Policies Map” should be deleted, as this map has ignored huge areas of green belt protection.

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

Attached documents: KJS 2017 consultation response (rev 01F).pdf (7.6 MB)
particular, I welcome the protection this offers to our countryside. Specifically, I welcome and support the
acknowledgement that the land lying between Normandy and Flexford (the previous site A46) is particularly sensitive in
Green Belt terms as it contributes significantly to the ‘openness’ of the Green Belt in this area, as well as being of high
grade agriculturally and therefore of importance in terms of the rural economy.

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

Attached documents:

1. I object to the removal from the Green Belt of homes in Guildford Road, the northern end of Glaziers
   Lane, Flexford, Walden Cottages and Palm House Nurseries Traveller site. Placing these houses outside the
   Green Belt could enable development within these areas at a much higher density and will give greater success
   for planning applications. I believe that this is the wrong decision as these areas contribute to the “openness
   of the Green Belt”.

1. I am pleased to see the reversion of the Green Belt boundaries to similar to their existing levels (with the
   exception of ‘insetting’) as a consequence of the withdrawal of the previously proposed strategic sites (A46
   and A47). In particular, I welcome the protection this offers to our countryside. Specifically, I welcome and
   support the acknowledgement that the land lying between Normandy and Flexford (the previous site A46) is
   particularly sensitive in Green Belt terms as it contributes significantly to the ‘openness’ of the Green Belt in
   this area, as well as being of high grade agriculturally and therefore of importance in terms of the rural economy.

1. I object to the ‘insetting’ in the Green Belt of the three most settled areas of Normandy and Flexford for 2
   reasons.
   1. Firstly, no case has been made on the grounds of ‘exceptional circumstances’ for removing this land
      from the Green Belt, and by so doing, GBC will make it easier for further attrition of the Green Belt to
      take place in future as a result of extensions to the settlement area on adjacent Green Belt land
      (Traveller site at Palm House Nurseries (Policy/Site A50).
   2. Secondly, all three settlements contribute to the openness of the Green Belt and should therefore remain
      ‘washed over’ by it. This view has been supported by Planning Inspectors, who have indicated while
      rejecting recent appeal decisions that the land at Flexford and Normandy contributes to the openness of
      the Green Belt. ‘Insetting’ will make it much harder to sustain this crucial openness in future.

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

Attached documents:

1. POLICY P2

I OBJECT to not protecting the Green Belt (Policy P2)
This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brownfield sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.
In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

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

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

Attached documents:

**Comment ID:** PSLPP16/6307  **Respondent:** 8732321 / John Freeland  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

I OBJECT to Send Village being taken out of the Green Belt which, under the aegis of the National Planning Policy Framework, is supposed to be inviolate. Guidelines and manifesto commitments should safeguard this unless there are "special circumstances", of which there are none.

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

Attached documents:

**Comment ID:** PSLPP16/16548  **Respondent:** 8732321 / John Freeland  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

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

Attached documents:

**Comment ID:** pslp171/113  **Respondent:** 8732321 / John Freeland  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

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

Green Belt - Policy P2, P3, E5 and sites GBC has made no attempt to justify wholesale destruction of the Green Belt, which should only be developed in “exceptional circumstances”. A massive 58% of all development is targeted in the Green Belt, showing complete contempt for the widely understood guidelines

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

Attached documents:

**Comment ID:** PSLPP16/13919  **Respondent:** 8732993 / Michael Weber  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
POLICY P2

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of “About Guildford” (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.
This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

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

Attached documents:

Comment ID: PSLPP16/13943  Respondent: 8732993 / Michael Weber  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

SITES - POLICIES A1 TO A57

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as III as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in
relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

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

Attached documents:

Comment ID: PSLPP16/15791  Respondent: 8732993 / Michael Weber  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.
Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.
GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

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

Attacked documents:

Comment ID: PSLPP16/3189  Respondent: 8733857 / Tony Edwards  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement up of to 2100 houses

I object to the draft Local Plan for 10 fundamental reasons:

1. I object to a plan which proposes that over 70% of new housing be built within the Green There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban sprawl stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

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

Attacked documents:

Comment ID: pslp171/556  Respondent: 8733857 / Tony Edwards  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Green Belt – POLICY P2 , POLICY P3, POLICY E5 and sites

Exceptional circumstances must be demonstrated in order to develop Greenbelt yet despite the weight of public opinion against weakening of this policy, 70% of new housing development will be in the countryside, of which, 58% will be in Greenbelt. By definition, this is not an exception and no attempt is made to demonstrate exceptional circumstances, in line with the requirements of the NPPF. Insetting villages is of concern since restrictions within the settlement boundary raises concerns over loss of character.

The Rural Economic Strategy covered in 4.51a, promoting affordable homes everywhere in the countryside including the AONB as a main aim, is a mechanism for promoting overdevelopment in our countryside. It has not been subject to full public consultation and is based on data, which is not up-to-date.
Three major strategic sites – Blackwell Farm, the former Wisley Airfield [Three Farms Meadows] and Gosden Hill Farm – are in the Green Belt. Previous consultations show that, in line with the NPPF, the public would prefer to use brownfield land in the urban area first.

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

Attached documents:

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Comment ID: PSLPP16/4444  Respondent: 8734241 / Andrew Ingham  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

I am compelled to write after having read the latest version of the Guildford local plan. It shocks me that Guildford council, who has been voted in to look after the needs of local residents, could put such a set of concerning proposals forward and has still not taken on board the numerous concerns of its residents. If adopted, the repercussions will be regretted by all of us and our generations to come.

I object to the proposal to remove the Horsleys from the Green Belt and in turn destroy large amounts of Green Belt land around London - the exceptional circumstances required have not been demonstrated. This land was put in place to stop the inevitable urban sprawl and control pollution levels. This land should be considered sacrosanct and protected for local residents and visitors to enjoy, as an area of outstanding natural beauty and as an important habitat for local wildlife.

I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land.

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

Attached documents:

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Comment ID: pslp171/3496  Respondent: 8734785 / Bill Houghton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

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

I object to the proposal to inset Send Business Park from the Green belt because of the very restricted vehicle access along Tannery Lane. Any survey of traffic trying to enter Tannery Lane from either end, especially large commercial vehicles should discourage any development, gridlock would become an everyday problem.

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

Attached documents:

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Comment ID: PSLPP16/12923  Respondent: 8735873 / David and Gillian Allan  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

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This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

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I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

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In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

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

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/12973</th>
<th>Respondent: 8735873 / David and Gillian Allan</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as III as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as III as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and
decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

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

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<th>Comment ID:</th>
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<th>8740321 / J McClellan</th>
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**PERCENTAGE OF NEW HOUSING ON GREENBELT Policy P2**

I **OBJECT** to the large percentage of new Borough housing being built in the current greenbelt. There are more than enough brownfield sites and urban area that require re-development. Those should be used before destroying greenbelt which is an accessible amenity for all.

**EAST AND WEST HORSLEY BEING REMOVED FROM THE GREENBELT Policy P2**

I **OBJECT** to East and West Horsley being taken out of the greenbelt. These are green, rural villages with narrow country lanes running through them and contribute to the openness of the greenbelt.

**GREENBELT Policy P2**

I **OBJECT** to the wording and content of this policy which states "the general extent of the greenbelt has been retained" we are losing nearly 7% of the greenbelt when including insetting, my filling and increasing settlement boundaries.

**VILLAGE BOUNDARIES Policy P2**

I **OBJECT** to East and West Horsley's boundaries being greatly enlarged. This will ruin the rural nature of both villages and cause them to become soulless dormitory towns with no heart.

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

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<th>Comment ID:</th>
<th>PSLPP16/5108</th>
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<th>8741377 / Lisanne Mealing</th>
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**I object to not protecting the Green Belt (Policy P2)**

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43) There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed. We are unique and sustainable villages and removal will serve to blur our identities and enable development which will be harmful for our futures and our legacy to future generations.

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

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<th>Comment ID:</th>
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<th>8742657 / Michael Gilbert</th>
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<td>I object to the proposal that more than half of all new housing is on the Green Belt land.</td>
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<td>The plan rightly endorses GBC’s stated support for the preservation of the Green Belt and the countryside within the Borough but makes no case for the serious encroachments into the Green Belt proposed by the removal of Green Belt status/ insetting of villages and the redefinition of existing Green Belt boundaries for which we see no need or justification.</td>
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<td>We have as a consequence the following objections to/requests for the Proposed Local Plan-</td>
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<td>1. We object to the insetting of villages and in particular to the insetting of East Horsley in the Green Belt (4.3.13) and request that East Horsley continue to be washed over by the Green Belt as at present.</td>
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<td>2. We object to the Settlement Boundary changes proposed for East Horsley (4.3.16 and Proposals Map).</td>
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<td>The Greenbelt should be protected and its boundaries unchanged. There are no exceptional circumstances to justify building on the Green Belt or to change the boundaries of the Green Belt. As a reminder the purpose of the Green Belt is to:</td>
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- Check the unrestricted sprawl of large built up areas
- Prevent neighbouring towns merging into one another
- Assist in safeguarding the countryside from encroachment
- Preserve the setting and special character of historic towns
- Assist in urban regeneration by encouraging the recycling of derelict and other urban land.

To recommend that 70% of the proposed 14,000 houses should be built in the Green Belt is a seriously flawed policy and in no way complies with the legal principles by which the Green Belt is protected.

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

Attached documents:

Comment ID: PSLPP16/7667  Respondent: 8743073 / Darrell Howard  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

- The Greenbelt should be protected and its boundaries unchanged. There are no exceptional circumstances to justify building on the Green Belt or to change the boundaries of the Green Belt. As a reminder the purpose of the Green Belt is to:
  - Check the unrestricted sprawl of large built up areas
  - Prevent neighbouring towns merging into one another
  - Assist in safeguarding the countryside from encroachment
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To recommend that 70% of the proposed 14,000 houses should be built in the Green Belt is a seriously flawed policy and in no way complies with the legal principles by which the Green Belt is protected.

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

Attached documents:

Comment ID: PSLPP16/13872  Respondent: 8743137 / Ben Woodford  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

Our Green Belt is precious. It is what protects London from urban sprawl; it preserves air quality; it prevents flooding; it is the city’s playground. It is for us to conserve and protect it. There are 5 legal purposes for Green Belt, and it meets them all:

- To check the unrestricted sprawl of large built up areas
- To prevent neighbouring towns merging into one another
- To assist in safeguarding the countryside from encroachment
- To preserve the setting and special character of historic towns
To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

This policy is flawed and should have been amended. In the last consultation just six individuals, out of the c. 7,000 of those who took part in the consultation, supported the policy. Another 20 comments of support were from organisations such as: the University of Surrey, local councils (including Guildford), consultants (e.g. Savills) or landowners. But of the 1,371 who commented on the green belt policy 1,332 (97%) were against.

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

Attached documents:

Comment ID: PSLPP16/13877  Respondent: 8743137 / Ben Woodford  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The local plan proposes nearly 9000 new homes to be built on Green Belt land (compared with ~ 5000 current homes in Guildford, so approx. equal to 18% of the existing homes in the borough) – a huge proportion. The National Planning Policy Framework (NPPF) requires any change of Green Belt boundaries to demonstrate exceptional circumstances. Unmet housing need is NOT an exceptional circumstance in law. No exceptional circumstances have been disclosed. So the Green Belt boundaries should NOT be changed through the plan making process.

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

Attached documents:

Comment ID: PSLPP16/3911  Respondent: 8744161 / Michael Bridge  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

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Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.
circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.
Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

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

**Attached documents:**

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**Comment ID:** PSLPP16/312  **Respondent:** 8746465 / Matthew Tipper  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

As advised previously, my objections to the draft plan are that it would make our county and our village, an extension of Greater London. This is based upon estimates of the need for housing, due to inflated forecasts of immigration rates that are probably inaccurate, and certainly unnecessary and unwelcome at this scale.

In prioritising the massive construction implied by these migration forecasts, the draft fails to protect the Green Belt and productive agricultural land and the rural landscapes and character of the county. It fails to address the road and rail congestion and demand for schools and public services should it be implemented. It all but ignores the environmental impacts, such as local air quality, noise and light pollution, road safety, biodiversity loss and climate change. These problems are all too apparent in those parts of the world where urbanisation is unchecked.

In the national context the draft is unable to address the need to promote economic growth in the rest of our country, away from the southeast. But without a national effort to redistribute growth and wealth, any additional housing provided in Surrey would not remain affordable for long, and its provision would only consolidate the economic dominance of London at the expense of our countryside. England has over 45,000 ha previously developed land, enough for at least 1 million homes, but mainly outside London and the southeast (CPRE 2014: From wasted space to living spaces).

Given this availability, no compelling case or "exceptional circumstance" for the sacrifice of the Metropolitan Green Belt is possible. Green Belts have protected our land from urban sprawl for seventy years, and there remains adequate brownfield land for housing nationally. Instead this draft implicitly accepts a high immigration rate as a given, without consideration of ways to manage it. By catering to London's needs, it perpetuates problems of national importance with respect to immigration, the north-south divide, social mobility and environmental harm.

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

**Attached documents:**

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**Comment ID:** PSLPP16/315  **Respondent:** 8746465 / Matthew Tipper  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

Policy P2 Green Belt

I fully support the statement that "we (GBC) will continue to support the Green Belt". However I object to this draft that shows 65% of the construction would take place on the Green Belt! I object strongly to the proposal to inset East Horsley from the Green Belt and request that this proposal be dropped. I also object to the proposed boundary changes for East Horsley. I am
concerned that infilling will result. Green Belt rules make it clear that unfulfilled housing need is not considered to be an exceptional circumstance. If it were then the Green Belt would have been built over decades ago. The overriding requirements of the NPPF, especially NPPF 87, 88 and 89, must apply so that there is no harm to the Green Belt from housing development.

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

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Exceptional circumstances must be demonstrated in order to develop Greenbelt yet despite the weight of public opinion against weakening of this policy, 70% of new housing development will be in the countryside, of which, 58% will be in Greenbelt. By definition, this is not an exception and no attempt is made to demonstrate exceptional circumstances, in line with the requirements of the NPPF. Insetting villages is of concern since restrictions within the settlement boundary raises concerns over loss of character. The Rural Economic Strategy covered in 4.51a, promoting affordable homes everywhere in the countryside including the AONB as a main aim, is a mechanism for promoting overdevelopment in our countryside. It has not been subject to full public consultation and is based on data, which is not up-to-date.

Three major strategic sites – Blackwell Farm, Wisley Airfield and Gosden Hill Farm – are in the Green Belt. Previous consultations show that, in line with the NPPF, the public would prefer to use brownfield land in the urban area first.

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

**Attached documents:**

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<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/2670</th>
<th>Respondent:</th>
<th>8746753 / Miles Hackett</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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</table>
I object to Send being removed from the Green Belt.

The village Send provides a green buffer between Woking and Guildford. To develop in the Green Belt requires 'special circumstances' there are none to justify developing the land in and around Send so Guildford Borough Council have come up with another plan, to remove Send from the Green Belt therefore freeing up the and for development. Guildford Borough Council should not he allowed to abuse the Green Belt in this way in order to just suit themselves. The Green Belt was set up to control urban growth front unscrupulous Councils's and Developers permanently. If this is is not protected then all of the land in and around the village will he vulnerable to development. This would destroy the character of the village of Send . Guildford would merge with Woking through a series of urban estates.

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

Attached documents:

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Comment ID: pslp171/1409  Respondent: 8746753 / Miles Hackett  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

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

I object to Policy 2 paragraph 4.3.15, Green Belt to inset Send Business Park from the Green Belt because as already stated above, Tannery Lane is a country lane which is unsuitable for heavy traffic.

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

Attached documents:

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Comment ID: pslp171/2005  Respondent: 8748801 / N J Norton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

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

Para 4.3.18
I object to the changes to paragraph 4.3.18, page 56 as follows:
“The exceptions listed include development such as new buildings for agriculture and forestry, and the redevelopment of previously developed land subject to the impact on the openness of the Green Belt.” This wording weakens Green Belt protection.
I propose returning paragraph 4.3.18 to its original content as follows:
“The exceptions listed include development such as new buildings for agriculture and forestry, and the redevelopment of previously developed land where it would not have a greater impact on the openness of the Green Belt.”

Policy P2 Green Key Evidence Box
I object to the removal of the "National Policy Planning Framework" as a source of evidence in the green Key Evidence box, page 58.
I propose the reinstatement of "National Policy Planning Framework" as a source of evidence in the green Key Evidence box
I object to the inclusion of the renamed document "Settlement Hierarchy (Guildford Borough Council, 2014)" in the green Key Evidence box.

The Settlement Hierarchy document has little if anything to do with Green Belt policy. It was castigated in all previous rounds of consultation as a flawed analysis based on specious presentation to parish councils as a community survey without explanation that it would have future use in the Local Plan process. Its ability to define the services and facilities
of communities of various sizes has no bearing on Green Belt policy development or delivery. I propose reference to the "Settlement Hierarchy" document should be removed from the green Key Evidence box of Policy P2. I propose the references in the green Key Evidence box for Policy P2 should appear as follows:

Key Evidence

National Planning Policy Framework
Green Belt and Countryside Study Volumes I – VI (Guildford Borough Council, 2011 and 2014)

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

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/12301</th>
<th>Respondent: 8749473 / Charlotte Beckett</th>
<th>Agent:</th>
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I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I
assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development

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

Attached documents:
### Comment ID: PSLPP16/8580  Respondent: 8751105 / Amanda Harris  Agent:

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1. I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

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

**Attached documents:**

### Comment ID: PSLPP16/6540  Respondent: 8752097 / Lucy Meade-King  Agent:

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I am writing to object to the proposed changes to the Green Belt and the change to the Shalford Settlement Boundary with regard to the fields behind the Shalford Village Hall.

It is my view that the proposal to alter the Shalford settlement boundary to include this area is inappropriate and it would be better to retain the current boundary which follows clearly defined boundaries and ensure that this land and other open land is excluded from the settlement area.

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

**Attached documents:**

### Comment ID: PSLPP16/6541  Respondent: 8752097 / Lucy Meade-King  Agent:

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I strongly oppose any development on these fields and am concerned that the proposed changes to their status would open the door to developers who might wish to build on them. These fields contribute to the open character of the Village. Due to the height of the land, buildings of any height would change the skyline of Shalford and tower over and detract from the enjoyment of the many users of the Tennis and Bowls Clubs and the Village Hall.

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

**Attached documents:**

| Comment ID: | PSLPP16/6545 | Respondent: | 8752097 / Lucy Meade-King | Agent: |
|-------------|---------------|-------------|---------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ) | is Sound? ( ) | is Legally Compliant? ( ) |

I object to the proposed changes to the Green Belt and to the proposed scale of development on it which I do not believe is justified.

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

**Attached documents:**

| Comment ID: | PSLPP16/678 | Respondent: | 8752513 / R Attfield | Agent: |
|-------------|---------------|-------------|---------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ) | is Sound? ( ) | is Legally Compliant? ( ) |

I object to all of the proposals to make changes to boundaries and in particular those in regard to the Green Belt. I understand that NPPF rules state that Green Belt boundaries should only be changed in exceptional circumstances and none meeting this definition have been provided.

I strongly object to the proposal to inset East Horsley as it is a rural village that is pleasant to visit and makes a significant contribution to the character of the area and the Green Belt.

Finally I am very concerned about the belligerence of Guildford Borough Council’s planning department in continuing to favour such an aggressive expansionist policy that is to the gross detriment of the residents of this borough. To my knowledge this expansionist policy has not been made explicit by the council or any of its elected representatives and hence I do not believe that it has a sufficient mandate to support any part of it.

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

**Attached documents:**

| Comment ID: | PSLPP16/8130 | Respondent: | 8754273 / Jaqueline Bond | Agent: |
|-------------|---------------|-------------|---------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ) | is Sound? ( ) | is Legally Compliant? ( ) |

I would like to register objections to Guildford Borough Council Proposed Local Plan (June 2016) and inclusion in the plan of proposed multiple development sites in the Horsleys:
Urbanisation of the Green Belt

I strongly object to removal of the land areas in the vicinity of the Horsleys from the Green Belt. The Green Belt prevents urban sprawl and retains important wildlife corridors in proximity to the highly urbanized areas of outer London. It helps maintain clean air quality and provides recreational areas for urban dwellers from both Greater London and adjacent conurbations.

There are five legal reasons for protection of land assigned as Green Belt:

1. To check the unrestricted sprawl of large built up areas
2. To prevent neighbouring towns merging into one another
3. To assist in safeguarding the countryside from encroachment
4. To preserve the setting and special character of historic towns
5. To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

The provision of the Green Belt in the vicinity of the Horsleys meets the criteria listed above. The National Planning Policy Framework (NPPF) requires any change of Green Belt boundaries to demonstrate exceptional circumstances. Unmet housing need is not an exceptional circumstance in law. In addition the existence of the Green Belt/AONB is a reason for not meeting objectively assessed housing need (i.e., such protected land is a legal constraint against any such development). The proposed Local Plan has not demonstrated exceptional circumstances requiring additional housing in the vicinity of East and West Horsley.

Removal of Villages from the Green Belt

I strongly disagree with and object to the assumption made in the Proposed Submission Plan that it is reasonable to remove villages such as West and East Horsley from the Green Belt. It seems remarkable that a single act of Parliament by the current Government can undo the good work for the provision of the Green Belt and protection of rural England laid out in the Town and Country Planning Act of 1947. The rationale behind the need to protect rural areas in close proximity to ever growing metropolitan areas is more relevant today than ever, in light of the projected growth in UK population.

I object to the method of defining settlement hierarchy as described in the Proposed Submission Local Plan. In particular, I take exception to the "classification" of East Horsley as a "Semi Urban village" and question the basis for this classification. Horsley lacks most of the infrastructure and community facilities taken for granted in an urban area. The key charm and attraction of Horsley is essentially its rural character.

To accrete large numbers of new houses to the Horsley - Okham area would change the character of these ancient villages permanently, resulting in a detrimental impact on the environmental and village character. I therefore object to the proposed settlement boundary changes in East and West Horsley.

In summary, I strongly object to the proposal in the Proposed Submission Local Plan to take the following villages out of the Green Belt: East Horsley and West Horsley (North), Effingham, Ripley, Shere and West Horsley (South).

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

Attached documents:

Comment ID: PSLPP16/682  Respondent: 8755393 / Peter Borer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

I fully support the policy (4.3.17) of designating Green Belt between Ash Green Village and the Ash and Tongham urban areas to prevent coalescence. The geographic feature of the disused railway line provides natural boundary line for the southern extent of the Ash urban area.
Unfortunately the proposed Local Plan immediately violates the principles of Green Belt to prevent urban sprawl (4.3.11) by designating a major development site (A28) in what should be the area of separation. If this site is allowed to be developed, the separation between the Ash urban area and Ash Green village will be reduced to only a couple of hundred metres, encouraging coalescence.

Site A28 should be removed from the Local Plan and the area should be left as open space (SANG), to be used by the residents of the 1,200 homes proposed for the adjacent site A29

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

**Attached documents:**

**Comment ID:** PSLPP16/7318  **Respondent:** 8768161 / Adam Johnson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

**Effect of the Proposal on the Green Belt.**

I believe that it is vital to retain the integrity of the Green Belt within Surrey against development pressure. for the following reasons:

- Prevention of urban sprawl.

- Protection of valuable countryside.

- Green Belt aids urban regeneration by encouraging the use of derelict land within towns and cities.

- Provision of a valuable resource of open space for those living in London and other towns and cities.

Section 9 of the National Planning Policy Framework, published in March 2012 specifically states that "Once established, Green Belt boundaries should only be altered in exceptional circumstances". I cannot see why pressure to meet housing targets constitutes such an exceptional circumstance. The fact that the Green Belt is under such pressure to be developed is to me a sign that its protection should be enhanced, in order for it to continue to meet its original intention for future generations.

Recent research carried out by the CPRE shows that there are enough brownfield sites available in the UK to build 1,494,070 new homes, with the supply of these sites increasing. In this context, I would question the need for development on the Green Belt in any but the most exceptional case.

I know from direct experience within the real estate industry that there is a strong financial incentive to secure development rights and planning permission in the Green Belt because it is so much cheaper, and requires less effort and skill, to develop a greenfield rather than brownfield site. In addition, developing greenfield land on the edge of existing settlements means that profits can be maximised by avoiding major investments in infrastructure which may be required in either brownfield or a true greenfield development. As a result of these financial drivers, I am sure that there will be powerful lobby groups intent on securing development rights, within the Green Belt of Surrey in order to maximise short-term profit. I cannot agree that this is in the best interests of the Borough as a whole.

The identified West Horsley development sites set out in the Document make a significant contribution to the open character of the village and its context within its rural surroundings and the Green Belt. The sites are generally located on the outskirts of the village, and so development upon them will affect the context and character of the village. When considering the effect on the Green Belt countryside of the area, there is a significant difference between infill development within the geographical boundaries of the village, and development significantly extending its borders.

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

Attached documents:
I object to the effect of the local plan on the Metropolitan Green Belt in this area. I believe that it is vital to retain the integrity of the Green Belt within Surrey against development pressure. Section 9 of the National Planning Policy Framework specifically states that "Once established, Green Belt boundaries should only be altered in exceptional circumstances". I cannot see why pressure to meet housing targets constitutes such an exceptional circumstance. The fact that the Green Belt is under such pressure to be developed is to me a sign that its protection should be enhanced, in order for it to continue to meet its original intention for future generations. The identified West Horsley development sites set out in the Document make a significant contribution to the open character of the village and its context within its rural surroundings and the Green Belt. The sites are generally located on the outskirts of the village, and so development upon them will affect the context and character of the village. When considering the effect on the Green Belt countryside of the area, there is a significant difference between infill development within the geographical boundaries of the village, and development significantly extending its borders. In addition, the proposals taken as a whole would have an adverse effect on the Surrey Hills Area of Outstanding Natural Beauty, which is located adjacent to West Horsley. The proposed development site adjacent to the "Bell and Colvill" Garage at West Horsley, for which 40 houses are planned, would bring unsuitable intense development to a site which is far closer to the boundary of the AONB, and which is adjacent to a site of Great Landscape Value.

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

Attached documents:

Comment ID: PSLPP16/16290  Respondent: 8768609 / Sue Brown  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

The loss of any Green Belt is detrimental to the health of future generations. Pollution to existing residents and potential new residents in view of increased number of cars on the roads and long queues of waiting cars at junctions.

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

Attached documents:

Comment ID: PSLPP16/12531  Respondent: 8769793 / Laura Richards  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

1. POLICY P2

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.
Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of “About Guildford” (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I OBJECT to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I ALSO OBJECT to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive failure to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.
GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

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

Attached documents:

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**Comment ID:** PSLPP16/5064  **Respondent:** 8770177 / Phil Attwood  **Agent:**

<table>
<thead>
<tr>
<th>Document:</th>
<th>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

3.I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’) and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

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

Attached documents:

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**Comment ID:** PSLPP16/4886  **Respondent:** 8771233 / Ranald Mackinnon  **Agent:**

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1. **POLICY P2**

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the
borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of “About Guildford” (published by the Council) on page 5 states that “... the Plan rejects any schemes that would have a detrimental impact on the Green Belt.” This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

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

Attached documents:

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<th>Comment ID: PSLPP16/4902</th>
<th>Respondent: 8771233 / Ranald Mackinnon</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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1. SITES - POLICIES A1 TO A57

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

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

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<th>Comment ID: PSLPP16/5581</th>
<th>Respondent: 8771265 / H C MacKinnon</th>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

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

Attached documents:

Comment ID: PSLPP16/1913  Respondent: 8773313 / Susie Harkness  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing to object to the Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield, now known as Three Farms Meadows – Allocation A35 – for the phased development of a new settlement of up to 2100 dwellings.

My objections to the draft Local Plan read as follows:-

The proposal that over 70% of new housing be built within the Green Belt rather than utilising brownfield land in urban areas needing regeneration.

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

Attached documents:

Comment ID: PSLPP16/12859  Respondent: 8773377 / Anthony & Anne Bond  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Allowing unjustified Green Belt development (yet another broken promise) to pay for transport schemes will just generate more traffic from more homes, causing yet more congestion.

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

Attached documents:

Comment ID: PSLPP16/14453  Respondent: 8773377 / Anthony & Anne Bond  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

development on this scale on Green Belt is a betrayal and indicates that Brownfield alternatives are being ignored

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

Attached documents:

Comment ID: PSLPP16/12121  Respondent: 8773409 / G B Lovegrove  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

Pre-election promises were to protect the Green Belt. Why is the Green Belt being invaded now?

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

Attached documents:

Comment ID: PSLPP16/9769  Respondent: 8774369 / Gary Cooper  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

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

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

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

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

Attached documents:

Comment ID: PSLPP16/9770  Respondent: 8774369 / Gary Cooper  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

I object to the overall strategy

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

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

Attached documents:

Comment ID: PSLPP16/523  Respondent: 8775137 / Annette Clark  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
The specific areas that I object to are as follows:

1) I strongly object to the increased housing estates and buildings on Green Belt land. I brought my house in this area for this specific reason that the local area would not be build on and don't want to move. It is simply wrong to build on this land that is established green belt area.

I have lived in both Ripley Village and Send the whole essence and feel of a village is based on the quality of the space. The very special area that is Ripley and Send needs to be retained as it is. I understand the issues with housing however there are many other options and it does not have to be built on our doorsteps!! Please keep our green belt intact.

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

Attached documents:
Firstly and foremost, the greater majority of the proposed developments encroach on existing green belt land. This land should be sacrosanct, but once it has been developed in the manner suggested it will be lost to the green belt forever. Furthermore, once this principle has been set aside there can never be valid objection to further encroachment this green belt in the future.

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

Attached documents:

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My other concern is that the Green Belt is no longer being protected and by developing these areas not only are these green sites lost for ever but by their very position yet more traffic is created. The distinctive nature of Guildford with its green spaces and views across the town are what sets Guildford apart from the urban sprawl inside the M25. This is what has attracted so many to choose Guildford to live in. Please do not allow this to be ruined.

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

Attached documents:

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1. I object to the “insetting” of 14 villages from the Green Belt, and at “infilling” 12 of the borough’s Green Belt villages. I am not happy that settlement boundaries are to be hugely extended in many villages and that infilling is also proposed outside the settlement boundaries of 11 further villages. We should be minimising urban sprawl.

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

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This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.
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Attached documents:

Comment ID: PSLPP16/17037  Respondent: 8787969 / K Britton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Attached documents:

Comment ID: PSLPP16/760  Respondent: 8790529 / Nigel Carter  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I wish to object to the proposed development of the East and West Horsley areas, and proposal to create 821 homes in the next 5 years.

My reasons for objecting are;

1. The Plan suggests that a significant area of East and West Horsley are removed from the Green Belt area, which is intended to limit development to preserve the natural environment and beauty of the countryside. I have yet to see any convincing argument that removing Green Belt status is in the best interests of the residents Guildford Borough Council or the environment for which we are all responsible, when other options for development have not been more fully explored within the borough, which would negate the need to move the boundaries of the Green Belt.
2. In most cases for development a Business case would have to prove a Need, and then options to meet that need. I do not believe that Guildford Borough Council has satisfactorily explored all options for development within the Borough excluding the requirement to redraw the boundaries of Green Belt land. Neither do I believe that the Need has been properly defined – merely it is a theoretical quota that GBC thinks it should apply – this is inadequate for a robust business case.

3. The boundaries of the Green Belt should be preserved – there is no case proven for this to be changed.

4. Horsley, being within the Green Belt, is also adjacent to the Surrey Hills, an Area of Outstanding Natural Beauty. Any change to the Green Belt status, and possible future development will have a detrimental knock on effect to the surrounding countryside.

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

Attached documents:

| Comment ID: PSLPP16/765  Respondent: 8790529 / Nigel Carter  Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |

1. Any development in this area could set a precedent for the whole of Green Belt Land and render the principle meaningless.

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

Attached documents:

| Comment ID: pslp171/1341  Respondent: 8791393 / B C Howe  Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |

I have lived with my parents in Horsley for number of years and I write to object to the revisions to the new local plan and taking the 1 I lorsleys out of the Green Belt. I note that with the amended 2017 plan that four of the original proposed housing developments sites remain. This is unacceptable to increase our village, by nearly 400 proposed residential units against an existing supply of circa 1,000 residential units. The evidence that exists is exaggerating the need for expansion as shown clearly by the GRA report on housing. Exceptional circumstances must be demonstrated in order to develop in the Green Belt and this is not an exception. It is wrong to take these sites out of the Green Belt in a single plan. What about our future generations such as mine? In addition why is Guildford choosing not to constrain its overall housing growth unlike other local authorities?

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

Attached documents:

| Comment ID: pslp171/1344  Respondent: 8791425 / L J Howe  Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
I have lived in I lorslcy for 22 years and I write to object to the revisions to the new local plan and to the extension of the settlement boundaries of the I-lorsleys into the Green Belt and the removal of the extended villages of Fast and West Jlorslev From the Green Belt. My concerns of the amended 2017 plan are that four of the original proposed housing developments sites remain. This is unacceptable to increase our village, by nearly 400 proposed residential units against an existing supply of circa 1,000 residential units. Incorrect evidence is exaggerating the need for expansion as shown clearly by the GRA report oil Exceptional circumstances must be demonstrated in order to develop in the Green Belt and by definition this is not an exception. It is incorrect to squander these Green Belt sites in a single plan, robbing future generations. In addition unlike other places, Guildford is choosing not to constrain its overall housing growth.

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

Attached documents:

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<tr>
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<th>Respondent: 8792193 / Brian Wolfe</th>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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</table>

1. Protecting POLICY P2: Green Belt

3.1.Local Plan Policy P2 states that “We will continue to protect the Metropolitan Green Belt”. I fully and support this policy which I believe was in the manifesto of all the candidates in last year’s local election. It is also the policy of the current government. Unfortunately GBC appears to think it should not apply to them. Through their housing policies as set out in the Local Plan, they plan some 65% of new developments to be on land which is currently

3.2.Green Belt – the table at Appendix A sets out these figure.

<table>
<thead>
<tr>
<th>Settlement</th>
<th>Homes (net increase)</th>
<th>Currently Greenbelt?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Guildford Town Centre</td>
<td>1,172</td>
<td></td>
</tr>
<tr>
<td>Guildford urban area (excluding Town Centre, including SARP)</td>
<td>1,570</td>
<td></td>
</tr>
<tr>
<td>Ash and Tongham</td>
<td>91</td>
<td></td>
</tr>
<tr>
<td>Inset villages and infill development within identified Green Belt villages</td>
<td>431</td>
<td>Y</td>
</tr>
<tr>
<td>Rural exception housing</td>
<td>90</td>
<td>Y</td>
</tr>
<tr>
<td>Description</td>
<td>Quantity</td>
<td>Type</td>
</tr>
<tr>
<td>----------------------------------------------------------------------------</td>
<td>----------</td>
<td>------</td>
</tr>
<tr>
<td>Previously developed land in the Green Belt</td>
<td>299</td>
<td>Y</td>
</tr>
<tr>
<td>Ash and Tongham strategic location of growth</td>
<td>1,241</td>
<td></td>
</tr>
<tr>
<td>Urban extensions to Guildford including Gosden Hill Farm, and Blackwell Farm (Policies A25 and A26)</td>
<td>3,940</td>
<td>Y</td>
</tr>
<tr>
<td>Former Wisley airfield (Policy A35)</td>
<td>2,100</td>
<td>Y</td>
</tr>
<tr>
<td>Normandy and Flexford village expansion (Policy A46)</td>
<td>1,100</td>
<td>Y</td>
</tr>
<tr>
<td>Village extensions (including Ash Green southern site)</td>
<td>993</td>
<td></td>
</tr>
<tr>
<td>Ash Green southern site (Site A27)</td>
<td>58</td>
<td></td>
</tr>
<tr>
<td>Village extensions (excluding Ash Green southern site)</td>
<td>935</td>
<td>Y</td>
</tr>
<tr>
<td>Windfall</td>
<td>625</td>
<td></td>
</tr>
<tr>
<td>Totals:</td>
<td>13,652</td>
<td>8,895</td>
</tr>
<tr>
<td>Proportions:</td>
<td>100%</td>
<td>65%</td>
</tr>
</tbody>
</table>

3.3. There are a number of other issues in the detailed implementation of this policy to which I also object, as set out below:

3.3.1. Paragraph 4.3.13: Proposal to inset East Horsley from the Green Belt Policy P2

3.3.2. East Horsley is in a rural location and the village has the look and feel of a rural village. Its Green Belt status has been a key factor in preserving that character. Being washed over by the Green Belt has been a constraint on the urbanisation of the village, it has prevented excessive infilling unlike Cobham where 3 or 4 new homes in gated communities have replaced 1 larger property.

3.3.3. GBC argues the need to inset East Horsley is based on a NPPF requirements, arguing that the test for inserting is that the village should make an important contribution to the openness of the Green Belt. This is not judged by viewing the village from Google Earth or on local maps. It is more than that, no less than 37% of East Horsley is composed of woodlands. When driving through the village the size of village is not evident, the scale of the development is not evident. When you pass by houses you can see between them when you do you do not see more houses but trees and openness. Within the settlement area there is an average housing density of just 8.1 dwellings per hectare (‘dph’). Woodlands and larger than average residential gardens make a vital contribution towards bio-diversity, provide wildlife
corridors, and provide those open spaces that are vital to the character of the greenbelt. East Horsley was regarded by the majority of residents as a small village in a recent survey that is how it is seen it has openness it has few if any hard edges and its irregular boundary helps to soften its profile with the countryside. Being washed over by the Green Belt has preserved the rural character and openness of this village.

3.3.4. Today East Horsley is a picturesque and flourishing rural community, which has and continues to experience a steady incremental growth with new properties being built on mainly Brownfield sites. I would encourage this to continue but with some restriction on the size of new homes with a focus on 2, 3 & 4 bed on any new of over 5 units. This can all be achieved with East Horsley still being washed over by the Greenbelt. There are no reasons to make any change as I can see no benefit from EH being inset within the green belt.

3.3.5. GBC are proposing to make a number of changes to the Settlement Boundaries of East Horsley and so expand the Settlement Area, as set out in the Proposals Map, with the justifications provided in the Green Belt & Countryside Study prepared by the consultants, Pegasus.

3.4. I comment on the proposed boundary changes, as follows:

3.4.1. There is a proposal to move the East Horsley Settlement Boundary westwards from behind the houses on the west side of Ockham Road North up to the eastern boundary of Lollesworth Wood. This proposal removes over 5 hectares of an isolated agricultural fields from the Green Belt. The present boundary line is defined by a deep and well-maintained drainage ditch which is classified by the Environment Agency as a ‘main river line’ and needs to be well maintained as it is in a flood zone 3. It ongoing ease of maintenance could be compromised if it were to become individual gardens. I am not opposed to moving this boundary west to the edge of woodland but am unsure of the ‘exceptional circumstances’ that justify the move.

3.4.2. There is also a proposal to move the East Horsley Settlement Boundary westwards from behind the houses on the west side of Kingston Avenue up to a tree line running along the Parish Boundary at the western edge of Kingston Meadows. The result is to take all of Kingston Meadows out of the Green Belt. Kingston Meadows is the main public recreational space of East Horsley, comprising various sports facilities and playing fields. The present Settlement Boundary is clearly defined by a deep and well-maintained drainage ditch running along its eastern side. It therefore represents a very defensible Green Belt boundary. Moving this boundary westwards to the edge of woodland in no way improves its defensibility. Under NPPF rules Green Belt boundaries should only be changed in ‘exceptional circumstances’. I cannot believe there are an exceptional circumstance that justify any change I it current defensible position it protect the openness of the greenbelt, the village, by presenting an irregular profile to the western edge of the village there is significant green indents to the western boundary and by having an irregular rather than a straight line softens the edge.

3.4.3. The same argument applies to the field north of Framgate Manor Farm a site included in the LAA which serves the same purpose of a fragmented profile to the western boundary which will be lost if developed with housing that will harden the edge to the village which will no longer meld with countryside.

3.4.4. As such I OBJECT to this proposed boundary change at Framgate Manor Farm and Kingston Meadows.

3.4.5. Proposal to remove Wisley Airfield from the Green Belt and to build 2000 Homes I OBJECTS to the proposal to remove Wisley Airfield from the Green Belt. The only justification for this proposed change is unfulfilled housing need which is not considered an exceptional circumstance. The proposed Wisley development is discussed further below.

3.5. d) POLICY P2: Limited In-filling

3.5.1. A new planning designation has been introduced called ‘the identified boundary of the village’. For East Horsley this covers a number of roads south of the A246. It is a sizeable area, covering 45 hectares, the equivalent of 23% of the present Settlement Area of the village. I find it difficult to understand why this is required it would appear that on the one hand East Horsley will be inset in the Green Belt and the area to the south of the A246 will be given similar protection currently enjoyed by the rest of East Horsley. This is sizeable area that if included within the settlement boundary leaving the whole of the village washed over by the Green Belt. In my opinion there is no justification to inset East Horsley in
the Greenbelt being washed over does not prevent limited infilling. Including the area to the south of the A246 within the settlement boundary could be justified providing the whole of East Horsley still remains washed over by the Greenbelt...

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

Attached documents:

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<th>Respondent:</th>
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<th>Agent:</th>
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<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
<td></td>
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</tbody>
</table>

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

1. Policy P2 Transfer

I object to:- The Green Belt policy P2 in the Local Plan states that “The Metropolitan Green Belt will continue to be protected”.

Justification for objection

• Under Paragraph 4.3.13 which proposes to inset the village of East Horsley from the Green Belt. Whilst some village will now no longer be inset, into the green belt, East Horsley is proposed to be inset. It is suggested in NPPF that where a village is currently washed over by the green belt it can be inset where they makes no contribution to the openness of the greenbelt. As most of the studies of the greenbelt would appear to have been made from looking at map or sitting at a desk one can see why some very important issues have been missed. A recent survey of residents in East Horsley resulted in the majority of residents referring to East Horsley as small village. With over 4000 residents it can hardly be regarded as small but to those living in the village and for those who passing through the ‘built form’ does not dominate, it is not what leaves an impression. The predominance of trees hedgerows and the low density of housing add to it rural feel its openness. The current settlement boundary is irregular allowing fields and woods to enter the village and allowing trees rather than roofscapes to dominate. The insetting of the village will destroy it current character and it openness by allowing greater infill and creating an urbanized hard edge to the village.

• It is also proposed to revise settlement boundaries many of them becoming straight line resulting in gaps being filled and yet another urbanized hard edge. By insetting villages, re defining settlement boundaries GBC are ignoring the latest planning guidance and recent amendments that the re defining of green belt boundaries and changing the lands status can only be done in ‘very special circumstances’ no compliant justification has been put forward by GBC in their plan for these undertakings. The Green Belt & Countryside Study produced for GBC by the consultants Pegasus proposes numerous changes in Green Belt boundaries prior to these planning changes and therefore without due justification or the ‘very special circumstances’ now required. The exercise undertaken by Pegasus was to deliver land for housing to use in the Local Plan. Pegasus suggested that because East Horsley was surrounded by tree was a justification for it not contributing to the openness of the greenbelt. How they reached such a ludicrous conclusion is unclear. It is the many trees that act as a screen that maintain the rural feel and openness in the surrounding countryside. The fact that you are unable to see East Horsley from surrounding field because of trees is in its favour and does contribute to the openness of the greenbelt. This would be in stark contrast to the hard edge likely to result from insetting and the resultant urbanisation of the village.

• The loss of greenbelt cannot be justified when it only involves moving the boundary for no other reason than from one equally defensible position to another.

• A further concern is the fact that a significant portion of building land identified in the Local plan is located in the eastern part of the borough. This is at the opposite end of the borough from where most employment and commercial growth is anticipated. There are therefore serious questions over it long term sustainability unless you have a car. It is also land that is closer to London, and represents the most vital part of the Green Belt needed to prevent the encroachment of the Metropolitan sprawl. Throughout the Local Plan consultations many thousands of residents across the borough have written to object to GBC’s approach towards this fundamental
issue, there were over 25,000 comments in the 2016 consultation, mostly opposing the plan. Judging by the revised 2017 Local Plan now proposed by GBC it seems that these voices have once again been ignored.

- **Amendment 4 in Appendix H maps Policy P2** There has been no earlier consultation on the proposed change to the designation of the land south of the A246. Change made to the proposed settlement boundaries of East Horsley under the revised 2017 local plan, as Appendix 4 H maps for East Horsley (South).

The Amendment 4 on this map shows land south of the A246 as part of the village and is designated as being within 'the identified boundary of the village' and designated Green Belt land outside of the settlement Boundary. Under Amendment 4 the settlement boundary is to be extended in this area. This is land which is close to and in some parts directly adjacent to the Surrey Hills AONB. It is a very low density part of the village located in a highly distinctive rural setting including in Chalk Lane a sunken single track road lined with chalk slopes and which dates back many hundreds of years. To bring such land within the settlement area of the village is not in any way justifiable and is very likely to lead to development that is inappropriate to the Green Belt. This area of the village has benefitted from Green Belt protection for many years but this proposed change would have a significant adverse impact and lead to the destruction on its character.

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

**Attached documents:**

---

**Comment ID:** PSLPP16/17856  **Respondent:** 8794529 / Paul Tubman  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

I am writing in response to the draft Guildford Local Plan consultation which is coming to an end today. I would like the below comments to be seen by the planning Inspector.

- I object to the insetting of the villages of Send, Send Marsh / Burnt Common and Ripley and their resulting removal from the Green Belt. The NPPF (paragraph 80) sets out five main purposes of the Green Belt, including:
  - To check the unrestricted sprawl of large built-up areas,
  - To prevent neighbouring towns merging into one another,
  - To assist in safeguarding the countryside from encroachment

The three villages of Send, Send Marsh / Burnt Common and Ripley both together and including the green spaces in between ensures that there is a buffer against the towns of Guildford and Woking becoming one continuous conurbation. The insetting of these villages would make it far easier to make future developments in and around these villages, thereby making the future merging of Woking and Guildford conurbations more likely, and thereby going against the main reasons for having the Green Belt in the first place. There are no obvious special circumstances given in the Local Plan to justify removing this restriction.

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

**Attached documents:**

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**Comment ID:** PSLPP16/16493  **Respondent:** 8794753 / Andrew Beckett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

I am writing in response to the draft Guildford Local Plan consultation which is coming to an end today. I would like the below comments to be seen by the planning Inspector.

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  - To assist in safeguarding the countryside from encroachment

The three villages of Send, Send Marsh / Burnt Common and Ripley both together and including the green spaces in between ensures that there is a buffer against the towns of Guildford and Woking becoming one continuous conurbation. The insetting of these villages would make it far easier to make future developments in and around these villages, thereby making the future merging of Woking and Guildford conurbations more likely, and thereby going against the main reasons for having the Green Belt in the first place. There are no obvious special circumstances given in the Local Plan to justify removing this restriction.

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

**Attached documents:**
I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of “About Guildford” (published by the Council) on page 5 states that “… the Plan rejects any schemes that would have a detrimental impact on the Green Belt.” This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.
Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

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

Attached documents:
Attached documents:

Comment ID: PSLPP16/16560  Respondent: 8795329 / Nicholas Williams  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

I object because the Green Belt needs to be protected. Policy P2 is completely flawed. Almost no one was in support at the last consultation and those that were, were organisations with their own business interests at heart.

No exceptional circumstances. No exceptional circumstances (a requirement by the NPPF for any change of Green Belt boundaries) have been demonstrated for the building of new homes on Green Belt land.

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

Attached documents:

Comment ID: PSLPP16/1439  Respondent: 8795553 / Robert Taylor  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

Policy P2: I OBJECT to this policy. Although GBC professes to protect the Green Belt it utterly fails to do so. Fully 65% of the housing development proposed in the Local Plan is to be built on land that is currently Green Belt. I also OBJECT to a number of the details given within this plan as follows:

Para 4.3.13  I OBJECT to the proposal to inset East Horsley from the Green Belt. The Green Belt rules have protected East Horsley and allowed it to flourish as a rural village whilst retaining its sense of openness. This policy will change that. It is an unnecessary policy and one that will impact negatively on the village of East Horsley.

Para 4.3.16  GBC is proposing to make 8 changes in the Settlement Boundaries of East Horsley. I OBJECT to all of these changes. There are no exceptional circumstances to justify any of these boundary movements and in not a single case is the defensive nature of the Green Belt boundary enhanced. All these changes are motivated solely by the desire to bring more land into the settlement area so that it may be developed for housing.

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

Attached documents:

Comment ID: pslp171/464  Respondent: 8795553 / Robert Taylor  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

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

Policy P2 Green Belt Policy

The revised Policy P2 totally fails to protect the Green Belt, with 57% of the new housing developments proposed in the local plan being located on land currently designated as Green Belt. To remove such large areas from the Green Belt and then propose a policy which states “The Metropolitan Green Belt will continue to be protected” is simple hypocrisy.
Paragraph 4.3.13 of this policy proposes to ‘inset’ the East Horsley settlement area from the Green Belt. This move will change the applicable planning policies in operation for new developments within East Horsley and will fundamentally impact on the character of this countryside village. East Horsley is a low density rural village which contributes importantly to the openness, biodiversity and variety of the Green Belt. The insetting of the village will harm all of this.

For the reasons above therefore: **I OBJECT TO THE INSETTING OF EAST HORSEY FROM THE GREEN BELT AS PROPOSED UNDER POLICY P2.**

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

**Attached documents:**

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**Comment ID:** PSLPP16/1343  **Respondent:** 8795649 / G Pask  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) -

**Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings**

I strongly object to the draft Local Plan for a number of reasons, namely:

I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

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

**Attached documents:**

---

**Comment ID:** PSLPP16/3377  **Respondent:** 8796321 / Nick Etches  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

3. Policy P2 – Green Belt: I **object** to this significant erosion of the Green Belt with the proposals for large towns being developed on Green Belt land thereby removing the openness of the Green Belt. I note in particular the huge developments proposed for the North East quadrant of the borough which will adversely affect our amenity, but also unfairly targets our tranquil rural villages because we can provide ‘dormitory’ facilities for commuters to London. The developments directly affecting our villages are the proposals for Wisley Airfield, Gosden Hill Farm, various farms and tracts in the Horsleys and Garlicks Arch at Send.

4. Further, on the erosion of Green Belt and I **object** that Policy P2 is not met where it states that Green Belt should be protected. I **object** to the disproportionate use of Green Belt land for housing – some 65% of the housing proposed is on Green Belt and with little consideration being given to redevelopment of brown field sites.

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

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

10. I object that GBC are contravening the NPPF framework stipulation in paragraph 87 with the proposed developments at Gosden Hill Farm, Ripley, East and West Horsley and Garlicks Arch, Send. Paragraph 87 states “As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.” and GBC have not proven any special circumstance for developing on these Green Belt areas.

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

Attached documents:

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

12. I object to building on the Green Belt because the essential characteristic of Green Belt is its openness and permanence (National Planning Policy Framework paragraph 79).

13. I object to all other strategic sites in the Local Plan, Blackwell Farm, 3 Farms Meadows, Garlick’s Arch, West Horsley and Hog’s Back. All are out of proportion to the surrounding area and none qualify for the exceptional circumstances required to take them out of the Green Belt.

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

Attached documents:

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

I object to POLICY P2 (6), specifically the new phrasing ‘Limited infilling may also be appropriate outside the inset or identified settlement boundaries, where it can be demonstrated that the site is as a matter of fact on the ground within the village’ referring to Ockham and Wisley, and by extension to other villages with settlement boundaries. I feel this change in language creates less clarity around the purpose of settlement boundaries as regards development policy. This objection is made in the context of the fact that there is no change to POLICY P2 (5), the intention for East Clandon to have a settlement boundary for the first time, which I have previously and still object to.

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

Attached documents:
I object that GBC are contravening the NPPF framework stipulation in paragraph 87 which states “As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.” (Policy P2, P3, E5). The Guildford Green Belt Group have stated that 70% of new housing will be in countryside and 58% of this is on Green Belt (Gosden Hill, Wisley, Blackwell Farm). This is exceptional in size and thus does not meet the criteria to demonstrate exceptional circumstances. I support instead developing and densification of brown belt and urban areas. According to Policy H13, developments should have a maximum (and minimum) densification policy to prevent developers from using land inefficiently which leads to countryside erosion and ineffective use of brownfield sites.

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

Attached documents:

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Comment ID: PSLPP16/1473  Respondent: 8796481 / Sally Erhardt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

I object to the planned changes to the Green Belt. How can it be justified to take many villages, including Ripley, out of the green belt? The green belt is the envy of many countries and is there to protect our green areas in perpetuity. England is the most densely populated county in Europe and Surrey is the most densely populated county in England, the green belt was established for very sound reasons, which have not changed. Once lost the Green belt is never to be regained, the council should protect the Green Belt for our children and future generations.

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

Attached documents:

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Comment ID: pslp171/829  Respondent: 8796481 / Sally Erhardt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

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

I object removing Send Business Park from the Green Belt – 4.3.15 – There can be no justification for removing (insetting) this site from the green belt and therefore no ‘exceptional circumstances’ as required by the NPPF can be claimed.

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

Attached documents:

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Comment ID: PSLPP16/3689  Respondent: 8796609 / Rupert Pye  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

I also OBJECT to the fact that 76% of the proposed developments are on high quality Green Belt with only 24% being on Brownfield or Urban areas (Ash, Tongham and Guildford). It is also Government policy that Metropolitan Green Belt
should only be built on in exceptional circumstances and that in this context housing need alone is not an exceptional circumstance; I therefore OBJECT to the revised local plan as a whole.

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

**Attached documents:**

<table>
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<th>Comment ID: PSLPP16/2973</th>
<th>Respondent: 8796673 / Suzanne Burroughs</th>
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1. I OBJECT to not protecting the Green Belt (Policy P2). Why do we have a greenbelt policy if it is not respected. It seems to me that GBC are completely ignoring our green belt.

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever. And are the housing numbers correct? As we have no access to the consultants work it is not possible to check.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not adress Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

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

**Attached documents:**

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The Local Plan has been drafted with the view that we need a certain number of new houses within the borough, but with half the borough designated as the Surrey Hills Area of Outstanding Natural Beauty (AONB) this large number of houses has to be accommodated within the other half of the borough. Much of this other half of the borough is Green Belt and the Local Plan then allocates 76% of the proposed new houses to be built on Green Belt land leaving the remaining 24% to be built on Brownfield and Urban land, namely in Ash and Tongham and Guildford. Our elected Council promised to protect our Green Belt in Surrey and have totally failed the people of Surrey with their revised Local Plan, as after the huge number of objections to the Local Plan of 2014 by the public the Council promised it would listen to the comments made. We were told they would be taken in to account in the revised Local Plan and I see very little evidence of them having done so, and indeed there has been an increase, including 100 new houses in Policy A39, in the number of proposed houses to be built with a higher housing density that will forever change the character of our villages.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
I am very disappointed that our local Conservative Councillors voted in favour of so many of the various Policies within the Local Plan. We have a Conservative Council in Guildford because they were voted in on the basis that we were being offered policies that would help protect our unique countryside in Surrey. We see more of the beautiful countryside threatened with being concreted over and we will become just another part of the ever growing urban sprawl of London, the London Borough of Guildford maybe?

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

> I don’t believe the draft plan accords with the NPPF policies on protecting the Green Belt.
>
> Exceptional circumstances need to be clearly shown to justify removing areas from the Green Belt. This has not been done.

> The need for housing and “a number” is not itself a very special circumstance justifying indiscriminate removal of sites from the Green Belt. Having properly calculated a housing needs number, constraints should be applied to it to reflect the Green Belt and the AONB. Each Green Belt site needs to be considered on its own merits. You have not done this. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft plan does not demonstrate that this has been done.
>
> Even once a housing number has been calculated it cannot be used to justify taking out Green Belt land on a wholesale basis.

> No exceptional circumstances have been presented which would permit any of the sites in this 2016 Plan to be taken out of the Green Belt.

> The Council is not committed to any of this.

> I urge you to reject this plan and respect the wishes of the people of West Clandon and all right thinking residents of Surrey who are against any building on the Green Belt.
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<th>Comment ID: PSLPP16/11790</th>
<th>Respondent: 8797665 / Sylvia Lillywhite</th>
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P2 In my opinion the Green belt is not protected by GBC, you are trying to change boundaries already, what hope do we have. I do not like the idea of infilling in the proposed new area!! of East Horsley south of the A246.

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

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<tr>
<th>Comment ID: PSLPP16/17015</th>
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I don’t believe the draft plan accords with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be clearly shown to justify removing areas from the Green Belt. This has not been done.

The need for housing and “a number” is not itself a very special circumstance justifying indiscriminate removal of sites from the Green Belt. Having properly calculated a housing needs number, constraints should be applied to it to reflect the Green Belt and the AONB. Each Green Belt site needs to considered on its own merits. You have not done this. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft plan does not demonstrate that this has been done.

Even once a housing number has been calculated it cannot be used to justify taking out Green Belt land on a wholesale basis.

No exceptional circumstances have been presented which would permit any of the sites in this 2016 Plan to be taken out of the Green Belt.

I object to the Plan itself and all the specific policies therein. All aspects of this Plan will lead to uncontrolled destruction of Green Belt land.

The Green Belt is a long term government policy protected by law.

The Green Belt is already a living example of sustainable development in practice and it is not acknowledged in these policies nor in this 2016 plan.

The Council is not committed to any of this.

I urge you to reject this plan and respect the wishes of the people of West Clandon and all right thinking residents of Surrey who are against any building on the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.
To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

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

Attached documents:

Comment ID: PSLPP16/2730  Respondent: 8798881 / H L Cousins  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

4. I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’) and the land to be taken from the Green Belt. Once taken Green Belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
**Comment ID:** PSLPP16/8554  **Respondent:** 8799521 / David Donaldson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

**Green Belt**

We object strongly to the removal of the Horsleys from the Green Belt status because this protects the area from excessive development and loss of character. We don’t believe that the protection provided by Conservation Area status is good enough to prevent expansion of the villages in the same way that the Green Belt status has done. We do not believe we are faced with “exceptional circumstances” which would permit the re-designation of Green Belt land. We also object to the extension of the Settlement areas of Horsley which appear to have the sole aim of converting Green Belt land to potential building sites.

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

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**Comment ID:** PSLPP16/12743  **Respondent:** 8800545 / Bill Taylor  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

I object to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council's to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation.

Paragraph 4.3.16 only states that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified within the local plan. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise.

Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bring in mind that housing need in itself is not an exceptional circumstance and nor is the Council's growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned.
I object to the "insetting" of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the "openness" of the Green Belt, a term which neither the plan nor the NPPF defines.

To "inset" two-thirds of the borough's rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough's location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed "insetting" and boundary extensions go ahead.

I object to the proposals to remove from the Green Belt the so-called 'strategic sites' of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick's Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. The local plan fails to demonstrate any exceptional circumstances for these sites and villages (as mere housing need does not constitute a 'special circumstance') to be taken from the Green Belt. Once taken from the green belt they will be lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC's Green Belt & Countryside Report does not address Garlick's Arch (Policy A43 and A43a), so there is no evidence base to support including this site. Rather than developing Garlick's Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

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

Attached documents:

Comment ID: PSLPP16/12758  Respondent: 8800545 / Bill Taylor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

I object to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that "allocating these sites does not grant planning permission for development." However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether "exceptional circumstances" existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as well as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as III as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council
did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless "exceptional circumstances" for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

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

Attached documents:

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I fundamentally object to the removal of Send and Ripley from the Green Belt as this will lead to the destruction of these villages and their countryside features forever. The result of this will also be the complete urbanisation of the land between Guildford and Woking, which is bad planning, bad for the environment and bad for those who have chosen to live outside the urban sprawl.

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

Attached documents:

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

I am writing to object to the Local Plan which proposes to move the green belt boundary to exclude the fields behind Shalford Village Hall, and include them in the Village Settlement Boundary.

There is no compelling reason for you to make this change - and if it is to allow development here, then I believe this will change the character of the village (given the position and height of the field) so would object

I would be grateful if you would note my objection please

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/1565</th>
<th>Respondent: 8801761 / A Wright</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
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</table>
Policy P2, P3 & E5. I object that 58% of new housing development will be in the Green Belt, this is far too high. I particularly object to proposed development at Blackwell Farm, as this is an invaluable refuge for wildlife, eg. birds and butterflies, along the ridge of the North Downs. We must not destroy our heritage, please.

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

Attached documents:

Comment ID: PSLPP16/906  Respondent: 8801953 / Sarah Relf  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

I object to the removal of villages including West Horsley from the Green Belt by insetting and to extending the Settlement Area boundaries set out in Policy P2

GBC states in the first line of Policy P2, “We will continue to protect the Metropolitan Green Belt against inappropriate development”. This is blatantly untrue when around 65% of the proposed developments will be made on land that is currently in the Green Belt, and no “exceptional circumstances” or other reasons are provided to support the proposals for new Green Belt boundaries

The Key Evidence document “Guildford Borough Economic Strategy 2013-2031” makes no case for locating large numbers of new homes in West Horsley or its neighbouring villages, and proposed new economic development sites are on the opposite side of the Borough to West Horsley

West Horsley is a rural village in a rural location. Its Green Belt status should be preserved: it has been a key factor maintaining the character of the village, with its open green spaces, woodlands and large residential gardens, which make a vital contribution towards bio-diversity and providing wildlife corridors. Yet that same Green Belt status has not been a serious constraint on development within the village

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

Attached documents:

Comment ID: PSLPP16/14435  Respondent: 8801953 / Sarah Relf  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

POLICY P2

I object because:

- The statement that “the general extent of the Green Belt has been retained” is a bare-faced lie
- The policy is based on a flawed Green Belt and Countryside Study that, according to one Conservative Councillor was irregularly commissioned by Council officers without the authority of Councillors
- It is a matter of law, morality and national and local policy, that the Green Belt should be protected in perpetuity

I particularly object to insetting of villages from the Green Belt and extending settlement boundaries in many villages
Policy P2: I object to the Draft Local Plan's infringement of the Green Belt. Despite saying 'We will continue to protect the Metropolitan Green Belt' GBC plans to build 65% of its new homes on land currently within the Green Belt while using brownfield sites in Guildford for commercial purposes. I do not understand the logic behind the decision to use available brownfield sites in Guildford for commercial buildings instead of for the high density housing (particularly flats) that could provide homes for the many people who already work in Guildford but can't live there. Under NPPF rules, GBC could use the protection of the Green Belt as a constraint to the delivery of new housing, but they have voluntarily chosen not to, in direct breach of the Conservatives' promise to the electorate ('You can trust us with the Green Belt') before the elections.

- Para 3.13 proposes that East Horsley should be inset from the Green Belt, implying that it does not make an important contribution to the Green Belt. I object and contest this: East Horsley is composed of woodland, narrow, winding, tree-lined lanes and houses with large gardens and hedges. It is a rural village and its being in the Green Belt has preserved its character while still allowing housing stock (149 new homes in the village between 2000 and 2015).

- Para 4.16 proposes changes to the settlement boundaries of East and West Horsley. I object to Policy A39 which proposes moving the settlement boundary along the deep ditch (classified by the Environment Agency as a 'main river line') behind the houses on the west side of Ockham Road North to the eastern boundary of Lollesworth Wood, removing five hectares of land from the Green Belt. Under NPPF rules, Green Belt boundaries may only be changed in exceptional circumstances, and housing does not constitute such a circumstance. Another serious objection to this land being used for housing is its liability to flooding and part of it has been designated Level Three flood risk which is the highest risk of anywhere in East Horsley.

- I object to the settlement boundary being moved and Kingston Meadows being removed from the Green Belt. This is the main recreational space in East Horsley (the village green, in effect) and is used by families, fitness enthusiasts, children at play, footballers, dog walkers daily, and sometimes for community events such as the recent Queen's Birthday Party. I resent GBC's PR machine telling us how they and the Local Plan promote healthy living and exercise while they are actually threatening a valuable resource in East Horsley.

- Para 3.17: I object to the proposal to remove Wisley Airfield from the Green Belt. This tract of farmland is an important part of the Green Belt and is totally unsuitable for high density housing for many reasons, including traffic density, local infrastructure and poor air quality. Councillors voted unanimously against the recent development proposal so I do not understand why it is still included in the new draft Local Plan.
currently in the Green Belt. These proposals are completely unacceptable as, once destroyed, these previously protected and increasingly valuable green belt amenities can never be recovered. Their importance, not just to the residents of the Horsleys, but more widely as essential national resources in an increasingly built-up environment, cannot be overstated.

I therefore urge the Council to take a step back and radically reassess their current plans, which threaten enormous damage to this vulnerable area.

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

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/4666</th>
<th><strong>Respondent:</strong> 8803617 / Timothy Bruton</th>
<th><strong>Agent:</strong></th>
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<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), <strong>Sound?</strong> ( ), <strong>is Legally Compliant?</strong> ( )</td>
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I submit the following objections to proposals in the Local plan affecting the settlements of Send/ Send Marsh/ Burnt Common.

1. **Inserting Of the Send village within the green belt**

I wish to object to this proposal as it makes available for development a significant number sites in addition to those specifically identified in the Local Plan. Sites such as the land behind Heath Drive and soon to be redundant ST Bede’s school buildings could be used for housing. This will significantly change the nature of the village from a rural setting to an urban environment. Furthermore, this will place additional strain on the already limited infrastructure where the village schools are full with no additional capacity. The Village Medical Centre is also full and the roads are already over capacity. Public transport is already very limited with no late evening or Sunday service. Further development in the village will visually impact the Wey Navigation Corridor, a major local and national asset.

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

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: pslp171/652</th>
<th><strong>Respondent:</strong> 8803617 / Timothy Bruton</th>
<th><strong>Agent:</strong></th>
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<tr>
<td><strong>Document:</strong></td>
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</table>

Inserting the Send Business Centre within the green belt.

Send has suffered significant erosion of its greenbelt through the approval of the marina in Tannery Lane and the Vision Engineering factory in Send. Additional development at the Send business centre would significantly alter the character of the village. The poor quality of Tannery Lane has been noted above. Access for large vehicles from Send Road continues to be a major hazard. The A247 through Send is narrow and already overloaded. It cannot sustain additional traffic movements of Tannery Lane and to the new sites at Garlick’s Arch and the Burnt Common proposed industrial development. Improvement to the road is very difficult given the narrowness of the road from Sandy Lane to Mays Corners and the mini roundabout in Old Woking is also a bottleneck.

The proposed developments taken in total destroy Send and Send Marsh Burnt Common as a pleasant semi-rural village and create a congested urban sprawl.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/13832</th>
<th>Respondent: 8803713 / Ian Berry</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
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<tr>
<td>I object to the plan to remove East and West Horsley from the Green Belt. The Green Belt was instigated for a reason, and that reason hasn't changed.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<th>Comment ID: PSLPP16/4272</th>
<th>Respondent: 8804417 / Vivian and Philip Markley</th>
<th>Agent:</th>
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<td>Document:</td>
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<tr>
<td>I refer to the proposed submission for the Guildford Local Plan.</td>
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<tr>
<td>I object to the plan for the following reasons:</td>
<td></td>
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<tr>
<td>1. Green belt changes</td>
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<tr>
<td>The Horsleys should not be removed from the Green belt. There are no valid &quot;exceptional circumstances&quot; which could or should permit this.</td>
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<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<tr>
<td>1. Extension of the boundaries of the settlement areas of the Horsleys</td>
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<tr>
<td>No cogent reasons have been given for the proposed changes and they should be dismissed. There should be no &quot;open door&quot; for additional future development of the Horsleys.</td>
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<tr>
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<tr>
<th>Comment ID: PSLPP16/3562</th>
<th>Respondent: 8804897 / Alan Goodfellow</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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</tbody>
</table>
I am writing to OBJECT to the draft local Plan.

I OBJECT to the taking of East Horsley, West Horsley and all other villages in the borough out of the Green Belt. In your response to the e-petition “Keep the Green Belt” dated 13 December 2013 it was stated that “The council also notes the essential characteristics of the Green Belt as being its OPENNESS and PERMANENCE, and that the Green Belt boundaries should only be altered in exceptional circumstances.” I do not believe that such circumstances exist and therefore the existing boundaries should be maintained thus protecting the villages from undesirable development, which would change the entire character of the villages which currently have great community feeling and this I feel would be destroyed. We have a duty to leave a legacy to future generations and this community feeling would be lost through over development.

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

**Attached documents:**

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**Comment ID:** PSLPP16/127  **Respondent:** 8804929 / Helen Beckett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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**Comment ID:** PSLPP16/4100  **Respondent:** 8805249 / Peter Warburton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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I object to the Guildford Borough Council Proposed Local Plan (June 2016) and, in particular to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings, and the erosion of greenbelt land in East and West Horsley.

I object to the draft Local Plan for the following key reasons in respect of Three Farms Meadows:
1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

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

Attached documents:

Comment ID: PSLPP16/4107  Respondent: 8805249 / Peter Warburton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

I object to the draft Local Plan for the following key reasons in respect of East and West Horsley:

1. I object a plan that removes East and West Horsley from the Green Belt.
2. I object to a plan that includes 533 new houses in East and West Horsley.
3. I object to the erosion of farmland
4. I object to a plan that will destroy the beauty of the village in which I live.

I trust that these objections will be fully considered.

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

Attached documents:

Comment ID: pslp171/421  Respondent: 8805249 / Peter Warburton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

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

The revised Green Belt Policy P2 continues to make the hollow promise that “The Metropolitan Green Belt will continue to be protected”. However, despite minor changes it has failed to revise Paragraph 4.3.13 which proposes to inset the village of East Horsley from the Green Belt.

There is no justification for this approach. East Horsley is a rural village of very low housing density. Within the current settlement area the average density of housing is just 8 dwellings per hectare. Most houses lying within the current settlement area have large gardens that are filled with trees, shrubs and open lawns. As a result East Horsley makes an important contribution to the Green Belt of this area, providing openness, picturesque green spaces and wildlife corridors which support a rich biodiversity – for example, there are currently an estimated 43 different protected species of wildlife to be found in East Horsley.

If East Horsley is inset from the Green Belt, as proposed in the revised Local Plan under Policy P2, then important Green Belt planning protection will be lost over land currently within the settlement area. This will inevitably lead to increased development within this area and the loss of openness, destruction of trees and hedgerows, diminished biodiversity and the impairment of picturesque views of this rural village.

It is also important to recognise that the locality of East and West Horsley represents one of the first lines of defence against Metropolitan urban encroachment outside of the M25 circle. To inset East and West Horsley from the Green Belt would therefore represent a further weakening of this important Green Belt barrier. Accordingly:

I OBJECT to the insetting of East Horsley proposed as part of Policy P2.
I also note one new change made to the proposed settlement boundaries of East Horsley under the revised 2017 local plan, as detailed in the accompanying Appendix H maps for East Horsley (South). The Amendment 4 on this map addresses land in the southern part of the village designated as being within ‘the identified boundary of the village’ and which is currently Green Belt land outside of the settlement area. However, under Amendment 4 the settlement boundary is to be extended further south to encompass all of this area.

This is land which is close to and in some parts directly adjacent to the Surrey Hills AONB. It is a very low density part of the village located in a highly distinctive rural setting including in Chalk Lane a sunken single track road lined with chalk slopes and which dates back many hundreds of years. To bring such land within the settlement area of the village is not in any way justifiable and is very likely to lead to development that is inappropriate to the Green Belt. This area of the village has benefitted from Green Belt protection for many years but this proposed change would have a significant adverse impact and lead to the destruction on its character. Accordingly:

I OBJECT to the movement of the settlement boundary proposed under Amendment 4 in Appendix H map of East Horsley (South), proposed as part of Policy P2.

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

Attached documents:

Comment ID: pslp171/574  Respondent: 8805985 / A C Jobson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

In view of new evidence which shows that Guildford’s projections for population growth is flawed and is predicting much higher growth than is likely, PLEASE can you reconsider your plan to build so many homes and especially on Green Belt land. There is evidence that Guildford's proposal for more than 12,426 homes (plus a buffer of 1,155 homes) is excessive and will result in needless loss of Green Belt and increased traffic congestion. It cannot be justified in what is already a highly congested borough.

There is evidence that Guildford’s population growth predictions are overestimated by about 40% because of under-recording of students leaving at the end of their studies.

Please LISTEN to the evidence and re-calculate your projections based on up-to-date evidence.

Once Green Belt land is gone - it is gone for ever. What will you say to your Grandchildren when they ask why Guildford is so busy and congested and horrid to live in?

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

Attached documents:

Comment ID: PSLPP16/5701  Respondent: 8806081 / Michael Burne  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Insetting of Villages – Chilworth

I note from the proposed Local Plan that it is intended to remove Chilworth’s Green Belt protection status (known as ‘insetting’).
I object to the proposal most strongly because:

1. The village is close to and overlooked by the Surrey Hills AONB and any development will have a detrimental effect on the enjoyment of this beautiful area.
2. The road network around Chilworth is overused already and queues, frequently through most of the New Road section of the village, develop at peak times, especially at school closing time at Tillingbourne School when parents collecting children park outside the school.
3. Most houses on New Road do not have off street parking so traffic is often clogged up by parked cars, exacerbating the problem at Item 1 above.
4. Although there are a shop and post office in the village they can’t supply everything for living so people will have to travel to Guildford, Godalming or elsewhere for shopping.
5. Assuming most people will work in surrounding towns or in London public transport won’t be able to cope, hence increasing traffic problems.
6. Is the infrastructure adequate for increased housing including water supply, sewerage, gas and electricity?
7. There are two schools in the village but it is doubtful if they would be adequate for an increase in population.

These are just a few points of some importance and I urge you to take them into account.

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

Attached documents:
The policy wording is tepid in support of the Metropolitan Green Belt even though the latter forms 89% of the borough and should be the cornerstone of all local planning policy. It is precious beyond the short-term demands of the present Government’s policy or a 15-year local plan. As noted under Policy S1 above, it is a solemn legacy to future generations – an asset and amenity that belongs as much to Londoners and the whole nation as to the people who live in it. It is an inalienable public good. Once gone it is gone forever. It is not the Council’s to give away.

Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. Building on it involves high opportunity costs, including an irreversible loss of:

- Agricultural production
- Rural leisure and tourism amenities
- Water catchment
- Flood control
- Biodiversity
- Natural heritage
- A carbon sink for air pollution
- Room for public facilities such as parks and burial grounds
- Profitable film locations (e.g. Shere)
- Future economic potential such as mineral extraction (even fracking)
- Natural beauty, landmarks, open space, rural views and sight lines
- Benefits to public health and wellbeing, physical and psychological (as well expressed in the NPPF)

As a matter of law, morality and national and local policy, these assets should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultations.

It is disreputable to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold. No-one argues that we should sell 1.6% of the Crown jewels in order to build houses.

I am not opposed to appropriate development in the Green Belt and recently supported a major planning application in my own village. But I fail to see why a system of fair burden-sharing of new development cannot be applied to the borough’s existing settlements in proportion to their size. This alternative would minimise the strain on infrastructure and maximise the chances of retaining the character of each settlement through gradual growth. It is reasonable to ask urban Guildford, with \( x \) times the population of semi-rural East Horsley for instance, to accommodate \( x \) times the number of new homes over the plan period. Parish councils could be asked, and will no doubt be willing, to propose where their quota of houses should go. Most rural residents are reasonable people who, if not alienated by top-down planners, will support realistic numbers of new houses in their neighbourhoods. Unfortunately, this democratic, bottom-up approach has not been attempted.

Instead, while developers flip and land-bank urban sites as a financial speculation, this plan will dump most new development on greenfield sites where building costs are lower, covering the Green Belt with dozens of housing estates that few residents want. 8,086 new houses are planned for the Green Belt but only 1,135 for Guildford urban area. This is disruptive, socially inequitable and unnecessary. It will not only destroy countryside but will also delay and disincentivise much-needed urban regeneration. The remarkable revival and repopulation of central London shows that building dormitory satellite settlements is an out-of-date approach to planning.

I particularly protest at the “insetting” of 14 villages from the Green Belt, and at “infilling” 12 of the borough’s Green Belt villages. I am deeply disturbed that settlement boundaries are to be hugely extended in many villages and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are “leggy” in outline, reflecting the effect of ribbon development (often along just one side of existing roads) permitted between the Wars. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development.
I believe this policy is based on a flawed Green Belt and Countryside Study that, according to one Conservative Councillor, was irregularly commissioned by Council officers without the authority of Councillors. To “inset” two thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, although they would quickly destroy them if the proposed “insetting” and boundary extensions go ahead. This policy is wildly disproportionate in terms of any foreseeable development need (especially post-Brexit) and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

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

**Attached documents:**

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**Comment ID:** PSLPP16/2370  **Respondent:** 8806305 / Laurence Cook  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

SITES1. Green Belt sites

I OBJECT to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development, however, it does identify the principle of development and uses.” This ignores the tens of thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. This amounts to a war of attrition by the Council in conjunction with developers, since many busy residents are sick and tired of repeating the same comments to deaf ears. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. Some residents have concluded that commenting is a waste of time.

All Green Belt sites should be removed from the plan until “exceptional circumstances” for development are proven, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established.

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

**Attached documents:**

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**Comment ID:** PSLPP16/2404  **Respondent:** 8806849 / Roland McKinney  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

I object to this policy.

My objections are detailed in the attachment.

Firstly, there is no national policy to remove villages from the green belt, this is a fallacy. National planning policy is set by the NPPF. The relevant paragraph is paragraph 86, which reads

"If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, then the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt"
It is inconceivable than none of the 15 villages to be inset make an important contribution to the openness of the Green Belt. The Key Evidence to justify this policy includes the Green Belt and Countryside Study, by Pegasus, which was a simple terrible study. Predetermination is evident in their approach, in the manipulation of data then produced, followed by dropping this data as it clearly showed the reverse of what they claimed. It was based entirely on subjective judgements and these should play no part in a policy which effects such radical change. There should be a transparent, objective process for assessing villages and this has not been done.

I especially object to the statement in the opening line of the Policy

"We will continue to protect the Metropolitan Green Belt...." Since when has protection included removing more than 6% of the land designated as green belt from that designation? What a peculiar form of protection - protect it by building on it. Death by a thousand cuts. This could have been written by George Orwell's Ministry of Truth, which appears to have taken up residence in Millmead.

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

Attached documents: Policy P2 Green Belt.pdf (3.5 MB)

Comment ID: PSLPP16/5409  Respondent: 8807617 / Anne Heine-Carmichael  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

You have been elected to look after our best interests and I do not believe anyone locally believes that getting rid of the green belt is either in our interests or should be within your remit without a vote. And I do not believe that anyone who lives locally wants further urban sprawl here.

We are looking to you to stand up to demands which are unreasonable and not wanted by the majority of local people.

You can take this email as a NO to taking any local villages out of the Greenbelt.

Many thanks. I appreciate the privilege we have of living in a democracy and being able to express our concerns.

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

Attached documents:

Comment ID: PSLPP16/3620  Respondent: 8808321 / Ian Peacock  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

Objection to the Guildford 2016 Local Plan

I object to the 2016 Draft Local Plan as a whole and in particular we object to the specific issues (listed below). I believe that this deeply flawed Local Plan will have a direct and detrimental effect on the amenity currently enjoyed by residents of East Clandon and to the even greater detriment to our neighbouring villages of West Clandon, Ripley, West and East Horsley. It erodes the openness of the Green Belt and endangers the beauty and views in and out of the Surrey Hills AONB.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to the Settlement Boundary which has been imposed on East Clandon without any consultation. This imposition provides no protection to further development outside of the settlement boundary (Policy P2 para 4.3.25) and is deemed by us as being unnecessary in an already tightly developed ancient and rural conservation village with high archaeological potential. We demand that this proposal be removed as it will endanger the openness of the Green Belt, the views in and out of the AONB (protection of the AONB Policy P1) and the character of our village.

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

I object that GBC are contravening the NPPF framework stipulation in paragraph 87 with the proposed developments at Gosden Hill Farm, Ripley, East and West Horsley and Garlicks Arch at Send. Paragraph 87 states “As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.” and GBC have not proven any special circumstance for developing on these Green Belt areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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I would like to make some comments about the draft plan. We note that A41 was removed from the list of sites in the previous plan which is very good news, but we also understand that much of the site is being retained for the possible rebuilding of a local school. We would object most strongly as it is part of an 'open' area backing on to West Horsley Place which is a Grade one property. The AONB in the S part of Horsley would look over this area, and clearly most of West Horsley should be left in the Green Belt. There are many listed properties and many rural views to be retained. It seems that the Borough Council continues to pursue its reckless 2014 decision to take many of the rural villages out of the Green Belt, which policy is almost unanimously hated.

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

| Attachments: | |

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I object most strongly to your proposals for wholesale changes to the Green Belt around Ockham, Ripley and Send. This serves the purpose of providing a buffer between the urban sprawl of London and Guildford itself. There are brownfield sites where housing can be provided without encroaching on the Green Belt.

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

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I object to building on the Green Belt because the essential characteristic of Green Belt is its openness and permanence (National Planning Policy Framework paragraph 79).

I set out below my objections to specific policies and matters within the Plan.

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

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

1. POLICY P2

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.
This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

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

Attached documents:

Comment ID: PSLPP16/5289  Respondent: 8810113 / Louise Stewart  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

1. SITES - POLICIES A1 TO A57

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

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

Attached documents:

Comment ID: PSLPP16/10361  Respondent: 8810241 / Helen Buttery  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the proposal to remove East & West Horsley villages from the Green belt.
I object to the proposal to extend the boundaries of settlement areas of the Horsleys.

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

Attached documents:

Comment ID: PSLPP16/16532  Respondent: 8810849 / Charles Lee  Agent:

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

I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to any proposal to take land out of the Greenbelt as is suggested with villages such as Ripley, Send and Clandon as well as sites of Wisley Airfield (A35) and Garlick’s Arch (A43). The National Planning Policy states clearly that it requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt and that housing need is not such an exceptional circumstance.

There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

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

Attached documents:

Comment ID: PSLPP16/16640  Respondent: 8810849 / Charles Lee  Agent:

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

I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to any proposal to take land out of the Greenbelt as is suggested with villages such as Ripley, Send and Clandon as well as sites of Wisley Airfield (A35) and Garlick’s Arch (A43). The National Planning Policy states clearly that it requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt and that housing need is not such an exceptional circumstance.

There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and
the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

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

Attached documents:

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Comment ID: PSLPP16/15103  Respondent: 8811009 / Rosalind Gleeson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

The destruction of the greenbelt is disgraceful, immoral and not even necessary. Brownfield sites are available, as are alternative arrangements for eg students and the elderly.

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

Attached documents:

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Comment ID: PSLPP16/9266  Respondent: 8812097 / Clare Benzikie  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than
is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of "empowering local people to shape their surroundings" and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

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

Attached documents:
I refer to the proposal to build 593 new houses in the Horsleys and would make the following comments and objections:

1. In order to carry out the proposed build programme The Horsleys are to be removed from the Green Belt. As I understand it such actions can only be taken in the most exceptional circumstances. What are these exceptional circumstances? As far as I can see such circumstances have not been demonstrated and therefore may be unlawful.

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

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<td>The proposers of the Plan have failed to provide sound reasons for the extension of the boundaries of the “Settlement Areas” of the Horsleys other than to increase the land available for future development. If these changes are allowed such a precedent would be a disaster for all rural areas.</td>
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<td>I OBJECT strongly to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick's Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or for development on Green Belt. There are no exceptional circumstances for these villages and the land to be taken from the Green Belt. Mere housing need does not constitute a 'special circumstance'. And once taken the green belt is lost forever.</td>
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There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC's Green Belt and Countryside Report does not address Garlick's Arch, so there is no evidence base to support including this site. 

Rather than developing Garlick's Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

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

Attached documents:
I OBJECT to all insetting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley

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

Attached documents:

**Comment ID:** pslp171/2292  **Respondent:** 8817121 / Celia Howard  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

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

Greenbelt Policy 2 Paragraph 4.3.15.

Further expansion of the Send Business Park means more large vehicles entering the lane and beyond the Tannery the lane becomes rural and is unsuitable for large lorries that come from Polesdon Lane on their Sat Nav getting stuck and lost by the time they reach the Papercourt Farm.

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

Attached documents:

**Comment ID:** pslp171/3058  **Respondent:** 8817153 / Paul Ives  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

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

Regrettably, while Guildford Borough Council continues to claim that it is defending the Green Belt, it is still attempting to impose excessive housing density therein. The residents of East Horsley feel very strongly about the potential impact of the changes proposed in the plan and deplore the removal of its green belt status by making it an ‘inset’ within the Green Belt.

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

Attached documents:

**Comment ID:** PSLPP16/17075  **Respondent:** 8817377 / Mark Silcock  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

I object to the removal of Send from the Green Belt because the village and its countryside provides a necessary space between Woking and Guildford.

I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford’s urban brownfield areas much closer to existing transport hubs.

I object to the building on the Green Belt at Send at Garlick’s Arch, Clockbarn Nurseries and Send Hill because it is not justified by any special circumstances and the fact that Green Belt is meant to be permanent and not continually reduced.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4015  Respondent: 8817537 / Kim Meredith  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the proposed removal of the villages of Send, Ripley and Clandon from the Green Belt. There are no ‘exceptional circumstances’ for the boundaries of these villages to be altered in any way.

I object to the proposed removal of Garlick’s Arch (A43) and Wisley Airfield (A35) for the Green Belt as again there are no ‘exceptional circumstances’ to do so.

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

Attached documents:

Comment ID: PSLPP16/4029  Respondent: 8817537 / Kim Meredith  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object that this statement has been totally ignored in the Local Plan - “The fundamental aim of the Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belt are their openness and their permanence.” GBC seem to want to destroy the Green Belt not keep it.

I object that the proposed Local Plan does not meet the needs and desires of local communities who enjoy access to the countryside, clean air and peace and quiet afforded by wide open spaces.

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

Attached documents:

Comment ID: PSLPP16/6533  Respondent: 8817569 / Peter Davies  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

the removal of the Horsleys from the Green Belt requires "exceptional circumstances” and these have not been demonstrated.

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

Attached documents:

Comment ID: PSLPP16/6534  Respondent: 8817569 / Peter Davies  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

To summarise my personal key objection, firstly, the Green Belt. What is the point of a Green Belt if its status can be significantly changed by a local group? We, as a generation, (and I am in my sixties) are always being accused of ruining the future for the following generation. To remove Green Belt status and to build on it is a serious issue – let us not make a big mistake which can never be undone. I OBJECT to any significant alteration to the Green Belt.

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.
I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

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

Attached documents:

Comment ID: PSLPP16/16435  Respondent: 8818625 / Beth and Frank Fuller  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.
1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

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

Attached documents:

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<th>Respondent: 8818689 / Janet Tipper</th>
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<td>Much of the proposed building is on the Green Belt. As you well know, this is illegal except in case of &quot;exceptional circumstance&quot; and we are not in this situation at present, nor will we be in the foreseeable future. The population growth forecast you are using is flawed.</td>
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<td>The fact that the plan proposes to take the Horsleys out of the Green Belt makes my blood run cold. Almost one third of the houses proposed in the plan for Horsley are to be built on Green Belt land, which is simply disgraceful. And once these are completed how can GBC possibly justify the risk of opening the door to further unrestrained development.</td>
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<td>• I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.</td>
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I object to Policy P2. Green Belt Land.

I welcome the removal of Sites A46 and A47 from the Local Plan, as this land is in the Green Belt and I fully support the intention to “check the unrestricted sprawl of large, built-up areas,” “prevent neighbouring towns from merging into each other” and “safeguarding the countryside from encroachment.” As most of Normandy and Flexford lie within the Green Belt, this also applies to other sites in the village. I am concerned that some areas have been removed from the Green Belt; these include Guildford Road at the northern end of Glazier’s Lane, Walden Cottages and Palm House Nurseries. Any development of these areas may well create a precedent for higher density housing, encouraging planning applications and the potential loss of even further valuable Green Belt land.

I would urge GBC to concentrate on approving plans to build on Brown Field Sites before any consideration is made to accommodate the loss of even more Green Belt Land.

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

Attached documents:
POLICY P2

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brownfield sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages.

In particular I OBJECT to the settlement boundary put round East Clandon with no reference to the residents or the Parish Council.

Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London.
cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

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

**Attached documents:**
I object whole-heartedly to the erosion of the Green Belt and in particular the village where I reside, West Horsley. I strongly object to the proposal that Ripley, Wisley, Clandon, Send and most particularly East and West Horsley are to be removed from the Green Belt. The proposal to "inset" any Surrey villages is preposterous and will open the door to unlimited future development and the destruction of our rural communities and villages. Once we allow the erosion of the Green Belt, it will be lost for ever, radically changing the characteristic green and rural landscape in which we reside. I strongly object to the village areas within the proposed boundaries being altered in any way or being removed from the Green Belt.

If you Google "Green Belt" the definition is: an area of open land around a city, on which building is restricted. Surely by removing the villages from the Green Belt you are then questioning the merit of a Green Belt I can find no one locally who agrees that the erosion of the Green Belt, or the removal of West Horsley from the Green Belt is a good idea; far from it, locals all agree that this is a fundamentally wrong proposal.

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

Attached documents:

Comment ID: PSLPP16/4294  Respondent: 8821025 / Karen McQuaid  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

POLICY P2 – GREEN BELT

I OBJECT. This policy states that the general extent of the Green Belt has been retained. This is not true.

The Green Belts forms 89% of the borough and should be the cornerstone of all local planning policy. It is precious beyond a 15 year local plan. It is a solemn legacy to future generations and an asset and amenity that belongs to the whole nation. Once it is gone, it is gone forever and it is not the Council’s to give away.

This policy omits any assessment of the Green Belt’s value. Building on it includes an irreversible loss of

Agricultural production

Rural leisure and tourism

Water catchment

Flood control

Biodiversity

Natural heritage

A carbon sink for air pollution

Room for public facilities such as parks and burial grounds

Profitable film locations such as Shere

Natural beauty, landmarks, open space, rural views

Benefits to public health and wellbeing, physical and psychological

These assets should be protected at all costs.
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<th>Comment ID: PSLPP16/4295</th>
<th>Respondent: 8821025 / Karen McQuaid</th>
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<td>I OBJECT to the ‘insetting’ of 14 villages from the Green Belt and at ‘infilling’ 12 of the borough’s Green Belt villages. The NPPF prevention of urban sprawl is ignored. It is all too easy to square off boundaries of villages by including countryside bounded on only one or two sides by existing development claiming it contributes nothing to the ‘openness’ of the Green Belt status. It goes against NPPF paragraph 17’s aim of ‘empowering local people to shape their surroundings’.</td>
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<td>I object to the removal of the Horselys from the Green Belt.</td>
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<td>1) Exceptional circumstances have not been identified.#</td>
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<td>2) Removal of Horselys from the Green Belt is against the pledge of GBC councillors in their election manifesto to protect the Green Belt.</td>
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<td>I object to the removal of Chilworth from the Green Belt.</td>
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<td>I find it difficult to understand why the village of Chilworth is to be removed from the Green Belt when other villages in the Tillingbourne valley, i.e. Albury, Shere, Gomshall and Abinger, are not to be removed.</td>
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<td>In the St. Martha Parish of Chilworth, most of the land is in an area of outstanding natural beauty. Is it also intended to take this out of the Green Belt?</td>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/946  Respondent: 8822241 / Malcolm Bond  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

Horsley is a lovely pair of green villages and while a modest amount of development is acceptable on sites such as Thatchers and bell & Colville, it is wrong to destroy irrevocably any part of the Green Belt in Horsley. The latter would be a rape of the area causing excessive pressure on the schools and health service in the locality.

Please imagine that YOU lived in such a great village and found it under this appalling threat! Then vote to KEEP the Green Belt as it is please....

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

Attached documents:

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Comment ID: PSLPP16/170  Respondent: 8823553 / Rick Day  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

4.3.13 While it may not be appropriate for villages to in the green belt at some point approaching the edge of most of these villages their character is very open and so does "make an important contribution to the openness of the Green Belt". It is therefore NOT appropriate to use the village boundaries to inset them in entirety. The inset boundary should be within the settlement boundary in many cases.

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

Attached documents:

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Comment ID: PSLPP16/4307  Respondent: 8824065 / Robin Hubbard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

I am writing to object to the proposal to move the green belt boundary such that the open fields behind the Shalford village hall lose their green belt protection. Why on earth would you do this? Who benefits?

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

Attached documents:
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<td>30 years ago I remember sitting in a geography lesson learning all about the green belt. How wonderful I thought, a system put in place to prevent urban spread and preserve the green spaces around rural villages. However, it appears Guildford Borough Council's local plan has no idea what a 'green belt' means. 500+ possible new builds around East and West Horsley, they are proposing. What a farce, they should be ashamed of themselves for even considering this. It will destroy our villages and rural way of life and I fear, if one plan goes ahead, it will just go on and on until there are no green spaces left for future generations to enjoy. As a family of 18 years residency in East Horsley we REJECT, ARE AGAINST, DO NOT SUPPORT AND THEREFORE STRONGLY OPPOSE the plan outright.</td>
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<td>Housing &amp; Green Belt</td>
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<td>The Metropolitan Green Belt has been a planning policy success and is intended to be an asset that is held in trust permanently for future generations. It is disingenuous to pretend to protect the Green Belt while at the same time proposing to remove large areas of the Borough from it. No case has been made for building on the Green Belt for which national policy requires exceptional circumstances. There are 400,000 units with planning permission in England not yet built and about 300,000 plots in developers’ strategic land banks. According to the CPRE (<a href="http://www.cpre.org.uk">www.cpre.org.uk</a> 2 November 2016) between 1.1 and 1.4m homes could be built on brownfield land. According to the Telegraph: (<a href="http://www.telegraph.co.uk/news/2017/02/03/number-empty-homes-hits-highest-rate-20-years-calling-question/">http://www.telegraph.co.uk/news/2017/02/03/number-empty-homes-hits-highest-rate-20-years-calling-question/</a> 3/2/ 2017), the UK has 1m more houses than households, the highest in 20 years and between 200,000 and 300,000 houses empty for more than 6 months. There is no housing shortage and no case for building in the Green Belt. It is the better and more efficient management of existing housing and land which is required.</td>
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<td>Policy P2 (Green Belt)</td>
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<td>1. I object to the changes to Policy P2 because the 32,000 objections from the last consultation have been largely ignored.</td>
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<td>2. I object to the new para (1) “The Metropolitan Green Belt will continue to be protected” because the Policies Map by effectively ignoring huge areas of Green Belt protection both contradicts and makes this new para (1) meaningless.</td>
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<td>3. I object to the omission of any assessment of the Green Belt in Policy P2. The Green Belt has valuable natural assets, including grazing and farmland, and a source of biodiversity and wildlife as well as recreation and health benefits.</td>
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<td>4. I object to the statement that the proposed loss of Green Belt is 1.6% This is inaccurate as the percentage may be higher and is not consistent with national policy which does not specify any acceptable percentage.</td>
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<td>6. I object to the false statement P2 (4.3.13) that these villages are ‘now inset from the Green Belt’ when this is only a proposal.</td>
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</table>
1. I object to any building on the Green Belt because it is essential to maintain its openness and permanence. This is part of para 79 of the National Planning Policy Framework.

2. I also object to any change in Green Belt boundaries, as there have not been any special circumstances proven to require boundary changes.

3. I totally object to the scale of the proposed increase in housing in the Borough, which is disproportionate, unjustified, and based upon flawed and unsubstantiated calculations of housing need. Any proposed growth in housing in the borough must be based on properly verified and substantiated forecasts which have been thoroughly and independently verified, and agreed at all levels. the Borough should not seek to accommodate or attract the overflow from areas such as London.

4. I object to additional housing because the current infrastructure (roads, schools, doctors etc) is already overcrowded and either at or over capacity, and additional housing will simply make the situation worse. There has been no proper assessment of the ability of the existing infrastructure to cope with the increase.

5. I object to the fact that additional development in the proposed Green Belt sites will not meet the criteria for sustainability and accessibility. These proposed Green Belt areas have little access to public transport, and any residents will therefore be very dependent upon the motor car for shopping, getting to work, travelling to school etc etc. Local rail services are already severely overcrowded, station parking is very limited, the A3 at peak times is at a standstill, as is the A3/M25 junction. Additional housing development, once the need is proven, should be placed where public transport is available, and not in locations where the motor car is essential for residents’ daily needs.

6. I object to the use of brownfield land for unnecessary commercial development and retail expansion. This means that Green Belt land would be unnecessarily used for housing development. If extra housing is required, then brownfield land should be the first choice.

7. Finally, I object to taking any of the Borough's villages out of the Green Belt as this would change their nature forever.
I am writing to object to the proposal in the new Guildford Local Plan to remove Green Belt protection from a number of villages such as Chilworth and Shalford.

I think it is important to preserve these villages as they are, while I also believe that the infrastructure, in particular the roads, cannot cope with any additional volume that any further development would invariably create.

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

Policy P2 - Green Belt

We are content with the first four paragraphs of the policy as this follows the NPPF.

That said, we fail to understand why the draft Local Plan goes against the explicit provisions of section 9 of the NPPF and proposes large scale development in the Green Belt across the borough and also goes against the provisions of the PPG and advice from Ministers in the Department of Communities and Local Government. If GBC persists in removing large chunks of land from the Green Belt it must explain why it is proposing to do so in the reasoned justification of this Policy.

The Green Belt is intended to prevent urban sprawl by keeping land permanently open in accordance with the NPPF and to safeguard the countryside from encroachment but a quick look at the map of the proposed new developments on the north east side of the borough would indicate that the continuous green ribbon along the A3 will have been destroyed by the development at Wisley, Garlick's Arch and Gosden Hill Farm and that we really would have continuous development from the M25 down the A3 into Guildford. We take the view that this is totally unacceptable.

We are struck by the fact that GBC seems to consider the Green Belt as a ready supply of land for development whilst at the same time they are not considering all the sites in the Town Centre that are available for development. Put another way a small amount of Green Belt land was lost in 2003 whilst a far greater amount is being identified for removal from the Green Belt in this draft- when will this erosion of the Green Belt stop? To make matters worse some of the land removed from the Green Belt in 2003 is still undeveloped- that is very difficult to explain. Paragraph 83 of the NPPF states that Green Belt boundaries should be permanent and should endure beyond the plan period. It does appear as if GBC have lost sight of this requirement.

We have read the Green Belt and Countryside Topic paper with some care in the hope that it would explain why so much Green Belt land has been identified for removal from the Green Belt and for development. In the Topic paper it is suggested by GBC that ‘our evidence base identifies a high level of need for market and affordable housing (including traveller accommodation) and employment. Given the extent of Green Belt across the borough (89 per cent) and the lack of sufficient suitable and deliverable sites located outside the Green Belt, to not amend boundaries would lead to a significant undersupply of homes compared to the identified needs – approximately half. The consequences of this within Guildford would be to exacerbate the existing affordability issues and have an adverse impact on economic growth in the area, which would lead to unsustainable commuting patterns.’ It is clear that GBC have taken a view that some building in the Green Belt may be necessary but they have been unable to substantiate the extent of this proposed development which would be harmful not only to the Green Belt itself but also to the borough.
The paper concludes that the affordable housing and economic need in Guildford is so severe that some Green Belt must be sacrificed. To make such large inroads into the Green Belt needs very careful examination and explanation and we are not convinced that such a case has been made. The views in the paper are entirely subjective based on a SHMA where we have argued that the OAN is too high (see the arguments on page 4 that the OAN should be not more than 510) and also on the affordable housing need where we argue that this need is not being adequately addressed by the Plan which is far more aligned to the demands of developers who make the highest profit from the sale of large four and five bedroom houses built on open land unencumbered by existing structures. GBC is relying solely on the need for new houses derived from the SHMA and has not given sufficient weight to the harm to the Green Belt that the proposed developments would cause.

As we understand current procedures the approach should be that the council works out what housing need is and then, when drawing up the housing target, determines whether environmental constraints (e.g. Green Belt) will hinder the ability to meet that housing need and allows therefore that housing target to be adjusted to something which is deliverable without having to rip up such environmental constraints.

The NPPF is clear that local planning authorities should, through their Local Plans, meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework taken as a whole or specific policies in the Framework indicate development should be restricted. Such policies include those relating to sites protected under the Birds and Habitats Directives, and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space; an Area of Outstanding Natural Beauty; designated heritage assets; and locations at risk of flooding or coastal erosion.

The PPG states that unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt.

We are also aware of clear Ministerial guidance on building in the Green Belt- “the single issue of unmet need - is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development in the Green Belt” - Nick Boles to Sir Paul Beresford MP 7th February 2014.

“...we were always very clear that we would maintain key protections for the countryside, and, in particular, for the Green Belt. The Framework makes it clear that a Green Belt boundary may be altered only in exceptional circumstances and reiterates the importance and permanence of the Green Belt” – Nick Boles to Sir Michael Pitt, Planning Inspectorate 3rd March 2014.

“Planning Guidance, updated in March 2014, also states that unmet housing need is unlikely to outweigh the harm to the Green Belt to constitute the very special circumstances justifying inappropriate development within the Green Belt” – Nick Boles to Sir Paul Beresford MP 18th June 2014.

We are also aware of the guidance given by the DCLG to their Inspectorate in December 2014 that the outcome of a Strategic Housing Market Assessment is untested and should not automatically be seen as a proxy for a final housing requirement in Local Plans. This is just what GBC have done.

When one considers all these arguments when put together, we conclude that GBC has not made a convincing case that so much land should be removed from the Green Belt for development.

We object to Policy P2 as it is unsound and does not follow the policy established in the NPPF nor the advice from Ministers in the DCLG.

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

Attached documents:

Comment ID: PSLPP16/8458   Respondent: 8825377 / Jane MacIntyre   Agent:
No ‘exceptional circumstances’ as national planning policy requires have been found to justify removing West Horsley from the Green Belt and building on Green Belt land. The proposed sites closest to where I live cover all but 40 of the proposed houses at a density much greater than the existing settlement and are out of character with the area. We face the prospect of 5 years of living in the middle of a building site without evidence or justification for such a massive change. It feels like we are being besieged by greedy developers.

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

Attached documents:

1. I object to the changes to Policy P2 which largely ignore the 32,000 objections from the last consultation.
2. I strongly object to the new para (1) “The Metropolitan Green Belt will continue to be protected” because the Policies Map by effectively ignoring huge areas of Green Belt protection both contradicts and makes this new para (1) meaningless.
3. I strongly object to the omission of any assessment of the Green Belt in Policy P2. The Green Belt has valuable natural assets, including grazing and farmland, and a source of biodiversity and wildlife as well as recreation and health benefits.
4. I object to the statement that the proposed loss of Green Belt is 1.6% This is inaccurate as the percentage may be higher and is not consistent with national policy which does not specify any acceptable percentage.
5. I strongly object to the continued proposed ‘insetting’ (removal) of West & East Horsley and other villages from the Green Belt and the expansion of the settlement boundaries.
6. I object to the false statement P2 (4.3.13) that these villages are ‘now inset from the Green Belt’ when this is only a proposal.

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

Attached documents:

Changes to Green Belt Boundaries

(Reference Guildford Borough Proposed Submission Local Plan (2017) Appendix H Maps, Normandy and Flexford)

I support the re-instatement of the land between Normandy and Flexford to green belt status (formerly the proposed Site A46). This land was examined and judged to be high sensitivity green belt and in my opinion it makes a significant contribution to the openness of the west of the borough.

I object to the removal of the Flexford and Normandy settlements (and additional small settled areas) from the green belt. I understand that the NPPF requires that changes to green belt boundaries can only be made if “exceptional
circumstances” are demonstrated. These proposed changes to the green belt do not appear to be justified and may lead to future attempts to remove adjacent land from green belt status to allow development.

The removal of Normandy and Flexford settlements from the green belt could lead to piecemeal over development of plots to the detriment of the openness of the area between Guildford and Ash without any particular long term vision or plan for infrastructure.

I hope that my views will be taken into account as part of the public consultation process.

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

Attached documents:
1. I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever. 

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not adress Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

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

Attached documents:

Comment ID: PSLPP16/5567  Respondent: 8826081 / Simon Wilcockson  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

In more detail:

1. Green Belt and Areas of Outstanding Natural Beauty

With reference to your Policy P2: Green Belt and the Countryside, and Policy P1: Surrey Hills Area of Outstanding Natural Beauty: it appears that decisions have been made by GBC that over 70% of new housing should be built within the Green Belt, and to ‘inset’ East and West Horsley and several neighbouring villages from the Green Belt. I STRONGLY OBJECT to GBC’s decisions on this, and this is supported by others, see below:

- The “exceptional circumstances” required before taking this action have not been demonstrated
- West Horsley residents oppose the village’s removal from the Green Belt
- The (independent) National Trust, in its comments on the Local Plan, states: “... we object to the removal of West Horsley from the Green Belt. West Horsley is smaller in scale, and very different in form and character from East Horsley and its rural nature and proximity to Hatchlands Park are such that we believe it should be retained within the Green Belt”, and in fact recommends northward extension of the Surrey Hills AONB to wash over Clandon, Hatchlands, and West and East Horsley [consultation comments of 8 September 2014 to GBC from John Gibson, National Trust].
- In its 2012 Planning Policy guidance the government said “The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open;
the essential characteristics of Green Belts are their openness and their permanence.” It also made clear that the construction of new buildings should be regarded as “inappropriate” for the Green Belt. Although some exceptions were set out, none cover the nature or extent of the proposals made by GBC. The Green Belt and Countryside Study is therefore flawed.

- The Key Evidence document ‘Guildford Borough Economic Strategy 2013-2031’ makes no case for locating large numbers of homes in West and East Horsley or neighbouring villages – it makes more sense to provide additional housing where new economic development sites are proposed, on the opposite side of the Borough.
- Given the proximity of these villages to the A3, removal of Green Belt protection will, over time, jeopardise containment of development leading to neighbouring villages merging into one another and further encroaching on the countryside, defeating one of the fundamental long-term objectives of the Green Belt.
- As you will be aware, our MP, Sir Paul Beresford, has repeatedly echoed these concerns in his Press Releases, and stated that the Government is not requiring any local authority to review their Green Belt.
- Significant development would adversely affect the beauty and character of the villages: West Horsley alone has 41 listed buildings. As the proposed development sites are on the outlying boundaries of the village they will inevitably increase the need for use of car(s) even for facilities in the village, with consequent traffic and parking problems.

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

Attached documents:

Comment ID: PSLPP16/5886  Respondent: 8826177 / Charles Spence  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

The travel infrastructure is inadequately addressed in the plan and, as previously stated, policy P2 is based on flawed housing needs. Accordingly, I object to the local plan.

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

Attached documents:

Comment ID: PSLPP16/13370  Respondent: 8826369 / Tim Madge  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

**POLICY P2**

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage.
The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of “About Guildford” (published by the Council) on page 5 states that “... the Plan rejects any schemes that would have a detrimental impact on the Green Belt.” This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition, I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.
There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

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

Attached documents:

Comment ID: PSLPP16/13169  Respondent: 8826529 / Martin Barker  Agent:

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

1. In Policy 9 you are seeking to take parts of a large number of villages out of the Green Belt. As a resident of Wood Street Village I have naturally looked at your proposal there and I do not understand what you are seeking to achieve by this change.

The settlement boundary has been extended mainly to the north and west. At the north-west corner you are now insetting light industrial buildings and small businesses – would you really want to kill off local employment for the sake of a few additional houses? Surely not, you should be encouraging local businesses to flourish. You are also now insetting all the houses along the north side of Oak Hill. Is your aim to allow residents to sell off their gardens for development? Surely this should not be encouraged. At the north-east corner you are also insetting light industrial buildings and small businesses. As stated earlier you should be encouraging local businesses to flourish. Their employees will tend to be local which will reduce the number of commuters to Guildford. All changes of the settlement boundary to the south merely inset common land and therefore could not be used for building of any sort.

NPPF para 83 states “Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.” You give no indication of what these exceptional circumstances are and therefore I do not see the benefit to GBC from making this change. Why don’t you explain in the Plan what your purpose is? Without understanding further I strongly object to the change.

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

Attached documents:

Comment ID: PSLPP16/18501  Respondent: 8826529 / Martin Barker  Agent:

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

In Policy 9 you are seeking to take parts of a large number of villages out of the Green Belt. As a resident of Wood Street Village I have naturally looked at your proposal there and I do not understand what you are seeking to achieve by this change.
The settlement boundary has been extended mainly to the north and west. At the north-west corner you are now insetting light industrial buildings and small businesses – would you really want to kill off local employment for the sake of a few additional houses? Surely not, you should be encouraging local businesses to flourish. You are also now insetting all the houses along the north side of Oak Hill. Is your aim to allow residents to sell off their gardens for development? Surely this should not be encouraged. At the north-east corner you are also insetting light industrial buildings and small businesses. As stated earlier you should be encouraging local businesses to flourish. Their employees will tend to be local which will reduce the number of commuters to Guildford. All changes of the settlement boundary to the south merely inset common land and therefore could not be used for building of any sort.

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

Attached documents:

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Comment ID: PSLPP16/8062  Respondent: 8826593 / Gilbert McClung  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

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

I object to the draft Local Plan for the following key reasons:

1. Green Belt (Policy P2)

The Local Plan contains no rational, reasonable or credible justification for building on the Green Belt as proposed. The National Planning Policy Framework (NPPF) requires any change of Green Belt boundaries to demonstrate exceptional circumstances, and the Local Plan neither demonstrates, nor discloses, any such exceptional circumstances. Unmet housing need is NOT an exceptional circumstance in law. It is clear, therefore, that the Green Belt boundaries should not be changed, and that this policy is flawed and should be amended.

In the last consultation just six individuals, out of the c. 7,000 of those who took part in the consultation, supported the policy. Another 20 comments of support were from organisations such as: the University of Surrey, local councils (including Guildford), consultants (e.g. Savills) or landowners. But of the 1,371 who commented on the green belt policy, 1,332 (97%) were against.

Over 70% of the proposed housing is planned for land currently in the Green Belt. Housing need is not a reason in law for protected Green Belt land being used. It is perverse for so much housing to be planned for the Green Belt. Clearly, the Green Belt has not been used as a constraint as clearly set out in Government advice, planning policy guidance, the NPPF, case law, election manifestos and Ministerial letters to MPs.

I also object to the proposed removal of West Horsley from the Green Belt by insetting and extending the 2003 Local Plan Settlement Area boundaries, and no exceptional circumstances or other justification is made for this proposal. The Green Belt & Countryside Study is flawed and the Key Evidence document 'Guildford Borough Economic Strategy 2013-2031' makes no case for locating large numbers of new homes in West and East Horsley or neighbouring villages. The number and density of housing proposed is not in keeping with the local area and is therefore against policies within the NPPF.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15921  Respondent: 8826593 / Gilbert McClung  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

I object to the proposed removal of West Horsley from the Green Belt by insetting and extending the 2003 Local Plan Settlement Area boundaries. The Green Belt & Countryside Study is flawed and the key evidence document ‘Guildford Borough Economic Strategy 2013-2031’ makes no case for locating large numbers of new homes in West and East Horsley or neighbouring villages. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

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

Attached documents:

Comment ID: PSLPP16/6098  Respondent: 8826913 / Gemma Harrison  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

1. I object to not protecting the Green Belt (Policy P2)

I strongly object to the proposals to remove the villages of Ripley, Send and Glandon from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. It also states that providing more housing is not considered 'exceptional circumstances'. There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another.

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

Attached documents:

Comment ID: pslp171/1766  Respondent: 8827169 / Mark Blowers  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

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

The revised Green Belt Policy P2 states that “The Metropolitan Green Belt will continue to be protected”. However, despite minor changes it has failed to revise Paragraph 4.3.13 which proposes to inset the villages of East Horsley and West Horsley from the Green Belt. In addition the Guildford Green Belt group have estimated that some 57% of all the new housing proposed in the 2017 GBC Local Plan is to be built on land which is currently Green Belt, this indicates that the Metropolitan Green belt will not be protected.

I object to the villages of East Horsley and West Horsley being inset from the Green Belt and I object to so much proposed housing being built on the Green Belt.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/4922  **Respondent:** 8827489 / Karen Bradshaw  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

Proposal to inset East Horsley from the Green Belt Policy

I OBJECT to the proposal that East Horsley should be inset from the Green Belt, instead of being ‘washed over’ as it is today. East Horsley is set in a rural location and the village has the look and feel of a rural village. Its Green Belt status has been a key factor in preserving that character. Moreover, being ‘washed over’ by the Green Belt has not been a serious constraint on development within the village. Woodlands and large residential gardens make a vital contribution towards biodiversity, provide wildlife corridors, and furnish those open spaces which are vital to the character of the greenbelt. Removal of the Horsleys from the Green Belt would require exceptional circumstances and these have not been demonstrated. There is no consideration in the plan of the effect of such insetting upon the villages and this is required by the National Planning Policy Framework.

Changes to the Settlement Boundaries

I OBJECT to the proposed Settlement Boundary changes in East Horsley. GBC are proposing to make a number of changes to the settlement boundaries of East Horsley and so expand the settlement area, as set out in the Proposals Map. The changes to the settlement boundaries in the Horsleys appear to have been done purely on the basis of including additional Greenfield sites which can then be built on. I can see no reasons given for the proposed changes and therefore the boundaries should remain as they are.

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

Attached documents:

**Comment ID:** PSLPP16/4566  **Respondent:** 8827777 / Mary English  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

1. **POLICY P2**

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.
Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of “About Guildford” (published by the Council) on page 5 states that “… the Plan rejects any schemes that would have a detrimental impact on the Green Belt.” This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.
GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

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

Attached documents:

Comment ID: PSLPP16/4582  Respondent: 8827777 / Mary English  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. SITES - POLICIES A1 TO A57

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

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

Attached documents:

Comment ID: PSLPP16/2962  Respondent: 8827809 / Robert Wood  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to not protecting the Green Belt.

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council's to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is reprehensible to argue, as the Council does, that the Plan would involve the loss of 'only' 1.6% of the borough's Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an 'acceptable' percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the council considers that exceptional circumstances exist to justify amendment of Green Belt. The exceptional circumstances are not identified. It is clear from national guidance that...
unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council's growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers' hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of 'About Guildford' (published by the Council) on page 5 states that '... the Plan rejects any schemes that would have a detrimental impact on the Green Belt.' This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the "insetting" of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them. I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the 'openness' of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF's other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To 'inset' two-thirds of the borough's rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough's location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed "insetting" and boundary extensions go ahead. This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17's aim of 'empowering local people to shape their surroundings' and other NPPF provisions.

Paragraph 4.3.17 states that 'the general extent of the Green Belt has been retained.' I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called 'strategic sites' of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick's Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing does not constitute a 'special circumstance') to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC's Green Belt & Countryside Report does not address Garlick's Arch, so there is no evidence base to support including this site.

Rather than developing Garlick's Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8556  Respondent: 8828353 / Claire Richards  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

Green Belt and the Countryside (Policy P2), Surrey Hills Area of Outstanding Natural Beauty (AONB) (Policy P1)

I object to the insetting of 14 villages from the Green Belt. The Green Belt is supposed to be protected by both national and local policy (ref 2003 local plan). Removing these villages from Green Belt protection sets a precedent that no doubt will expand. It is highly likely to alter the current character of the various villages it protects. The national Planning Policy Framework, para 87 states “As with previous Green Belt Policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved expect in exceptional circumstances’. The current local plan sees 8,202 (64.6%) of all proposed new homes are to be built in the Green Belt. I do not believe these exceptional circumstances have been demonstrated.

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

Attached documents:

Comment ID: PSLPP16/6509  Respondent: 8828385 / Thomas Meredith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

I object to any building on the Green Belt in Send at Garlick’s Arch, Clockbarn Nurseries or Send Hill because there are no special circumstances to do so and the Green Belt is supposed to be permanent.

I object to all building on the Green Belt at Send, Ripley and Clandon because any called for development can be accommodated in Guildford’s brownfield areas much closer to existing transport facilities

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

Attached documents:

Comment ID: PSLPP16/3711  Respondent: 8828417 / Valerie Wild  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

Policy P2 - Green Belt

OBJECT. Insetting villages in the Green Belt is contrary to the whole spirit and intention of the Green Belt. Insetting Fairlands is an example and could allow inappropriate planning applications having to be allowed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.
To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

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

Attached documents:
I am very concerned at the amendments which have been made to last year’s Local Plan. The Local Plan has been years in the making yet with each version, the proposals would make the environment in & around Send even worse. This is despite Send raising at least a third of the objections to the previous plans. The council is treating the villagers in contempt & is taking no notice of their valid & justifiable concerns. Therefore I object to the amendments in the latest version of the local plan.

I am very disappointed in the attitude of the Guildford Borough Council. They seem determined to take Send out of the Green Belt which is so important to keep it as a village & stop it merging with Guildford &/or Woking. This is despite the Government pledging to “maintain the existing strong protections on designated land like the green belt”. They have said that development on that land can only be permitted under “exceptional circumstances”. I do not believe that there are exceptional circumstances as Tom Fyans, director of campaigns and policy at the CPRE has said: “Green belt is being lost at an ever-faster rate, yet the type of housing being built now or in the future will do very little to address the affordable housing crisis faced by many families and young people.”

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

Attached documents:

Policy P2

I OBJECT to the many proposals that do not protect the Green Belt in the Borough. The Green Belt constitutes 89% of the borough and the local plan proposes that two thirds of the housing and industrial development is to be built on Green Belt land. The Green Belt was established in perpetuity to protect valuable countryside from the type of development now proposed. The proposals are not occasional, exceptional developments on Green Belt for special circumstances but development on the Green Belt on an enormous scale over various sites in the North East of the borough. By any measure the proposed developments on Green Belt are excessive and unsustainable.

I OBJECT to extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. The scope for development on the perimeters of Green Belt villages will result in inappropriate encroachment into the countryside.

I OBJECT that in 14 Villages in the Green Belt, “Limited infilling may also be appropriate outside the inset or identified settlement boundaries” as this will encourage large numbers of developments on village edges in the Green Belt which will inevitably impact the openness of the Green Belt.

I OBJECT to the enormous impact on the Green Belt of the proposals for large scale developments on Green Belt land at Wisley Airfield, Gosden Hill Farm, various sites in East and West Horsley and Garlicks Arch at Send. These proposed developments will have a huge impact on our local roads, rail services, medical facilities, shops and other infrastructure and will adversely affect our amenity and our tranquil rural village.

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

Attached documents:
7. I object to the lack of reference in the supporting text to Policy P2- Green Belt to controlling extensions to and replacement of buildings more strictly where protected landscape implications exist. I am authorised by the Surrey Hills AONB Board to express on its behalf planning AONB views and advice on all planning application and emerging planning policy consultations.

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

Attached documents:

8. Objection 6 - Extension to and replacement of buildings in the Green Belt and AONB/AGLV

There has been concern that within the Borough larger house extensions and replacement buildings have been permitted in the AONB/AGLV than in other constituent Surrey Hills planning authorities. Some of these have harmed the landscape and scenic beauty of such areas. It appears that if the proposal meets the Council’s interpretation of national and local Green Belt policies the development should be permitted without giving sufficient weight to any harm to the AONB/AGLV.

Reference is made in paragraphs 4.3.20 and 4.3.22 to a forthcoming Green Belt Supplementary Planning Document that would cover extensions to dwellings and replacements. That may be some time off. In view of the concern expressed above, the additional sentence to the reasoned justification for the policy at paragraph 4.3.11 set out in section 2 of this submission is asked to be included. It reads:

“4.3.11 Whilst a proposed development, including to extend, alter or replace a building may meet Green Belt policy, the vigilant exercise of development management powers to ensure that the landscape and scenic beauty of the AONB is conserved may result in the development not being permitted.”

Finally, it is hoped the Council can revise the relevant texts of the Submitted Version Local Plan to take into account the above concerns and suggestions. Otherwise, the Inspector is asked to recommend the requested changes.

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

Attached documents:
The draft Local Plan breaches section 9 of the NPPF by allowing large scale development in the Green Belt across the borough. This is also in conflict with the provisions of the NPPG and advice from Ministers in the Department of Communities and Local Affairs.

According to para 79 of the NPPF “The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.” The proposed new developments on the north east side of the borough at Wisley, Garlick's Arch and Gosden Hill Farm would result in continuous development from the M25 down the A3 into Guildford and destroy the green ribbon along the A3. This is totally unacceptable.

Whilst GBC have taken the view that extensive building in the Green Belt may be necessary, they have been unable to justify such development which would be harmful not only to the Green Belt but also to the borough itself. I consider the case for making such large inroads into the Green Belt has not been substantiated as it based on a SHMA in which, as argued above, the OAN is too high The Plan’s approach to the Green Belt is more aligned to the needs of developers who naturally would prefer to built on open land without any existing structures. The Plan does not give sufficient weight to the harm to the Green Belt that the proposed developments would cause.

The NPPF provides that local planning authorities should, through their Local Plans, meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework taken as a whole or where specific policies in the Framework indicate development should be restricted. Such policies include those relating to land designated as Green Belt, Local Green Space, Areas of Outstanding Natural Beauty and locations at risk of flooding.

As I understand it, the council should assess its housing need is and then, when drawing up the housing target, determine whether environmental constraints e.g. Green Belt, will hinder the ability to meet that need, and so reduce the target to a number which is deliverable without having to ignore environmental constraints.

The NPPF provides that unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt. I am aware of clear Ministerial guidance on building in the Green Belt e.g.:-

“the single issue of unmet need - is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development in the Green Belt” - Nick Boles to Sir Paul Beresford MP 7th February 2014.

“…we were always very clear that we would maintain key protections for the countryside, and, in particular, for the Green Belt. The Framework makes it clear that a Green Belt boundary may be altered only in exceptional circumstances and reiterates the importance and permanence of the Green Belt” – Nick Boles to Sir Michael Pitt, Planning Inspectorate 3rd March 2014.

“Planning Guidance, updated in March 2014, also states that unmet housing need is unlikely to outweigh the harm to the Green Belt to constitute the very special circumstances justifying inappropriate development within the Green Belt” – Nick Boles to Sir Paul Beresford MP 18th June 2014.

I am also aware of the guidance given by the DCLG to their Inspectorate in December 2014 that the outcome of a Strategic Housing Market Assessment is untested and should not automatically be seen as a proxy for a final housing requirement in Local Plans. This is just what GBC have done and I do not consider that GBC has made the case for so much land being removed from the Green Belt for development.

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

Attached documents:

Comment ID: PSLPP16/16957  Respondent: 8831393 / John Dumbleton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
POLICY P2- GREEN BELT

The draft Local Plan breaches section 9 of the NPPF by allowing large scale development in the Green Belt across the borough. This is also in conflict with the provisions of the NPPG and advice from Ministers in the Department of Communities and Local Affairs.

According to para 79 of the NPPF “The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.” The proposed new developments on the north east side of the borough at Wisley, Garlick's Arch and Gosden Hill Farm would result in continuous development from the M25 down the A3 into Guildford and destroy the green ribbon along the A3. This is totally unacceptable.

Whilst GBC have taken the view that extensive building in the Green Belt may be necessary, they have been unable to justify such development which would be harmful not only to the Green Belt but also to the borough itself. I consider the case for making such large inroads into the Green Belt has not been substantiated as it based on a SHMA in which, as argued above, the OAN is too high The Plan’s approach to the Green Belt is more aligned to the needs of developers who naturally would prefer to built on open land without any existing structures. The Plan does not give sufficient weight to the harm to the Green Belt that the proposed developments would cause.

The NPPF provides that local planning authorities should, through their Local Plans, meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework taken as a whole or where specific policies in the Framework indicate development should be restricted. Such policies include those relating to land designated as Green Belt, Local Green Space, Areas of Outstanding Natural Beauty and locations at risk of flooding.

As I understand it, the council should assess its housing need is and then, when drawing up the housing target, determine whether environmental constraints e.g. Green Belt, will hinder the ability to meet that need, and so reduce the target to a number which is deliverable without having to ignore environmental constraints.

The NPPG provides that unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt. I am aware of clear Ministerial guidance on building in the Green Belt e.g.:-

“the single issue of unmet need - is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development in the Green Belt” - Nick Boles to Sir Paul Beresford MP 7th February 2014.

“...we were always very clear that we would maintain key protections for the countryside, and, in particular, for the Green Belt. The Framework makes it clear that a Green Belt boundary may be altered only in exceptional circumstances and reiterates the importance and permanence of the Green Belt” – Nick Boles to Sir Michael Pitt, Planning Inspectorate 3rd March 2014.

“Planning Guidance, updated in March 2014, also states that unmet housing need is unlikely to outweigh the harm to the Green Belt to constitute the very special circumstances justifying inappropriate development within the Green Belt” – Nick Boles to Sir Paul Beresford MP 18th June 2014.

I am also aware of the guidance given by the DCLG to their Inspectorate in December 2014 that the outcome of a Strategic Housing Market Assessment is untested and should not automatically be seen as a proxy for a final housing requirement in Local Plans. This is just what GBC have done and I do not consider that GBC has made the case for so much land being removed from the Green Belt for development.

I therefore object to Policy P2 as it is unsound and does not meet the requirements of the NPPF nor the advice from Ministers in the DCLG.

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

Attached documents:
Comment ID: PSLPP16/17109  Respondent: 8831521 / Denis Coulon  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated without having to encroach on Green Belt land. Under the NPPPF, no exceptional circumstances have been established to warrant removing so much land from the Green Belt.

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

Attached documents:

Comment ID: pslp171/2216  Respondent: 8831809 / Ann Taylor  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

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

- Green Belt: I object to the proposed removal of the Gosden Hill, Burnt Common and Garlick’s Arch site from the Green Belt. There need to be exceptional reasons to justify such removals and I don’t consider that the Plan provides sufficiently weighty justification. These developments, together with that at Wisley, are a massive extension of the Guildford urban envelope and they alter very dramatically the character of our village, of the area around us and, indeed, of Guildford itself.

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

Attached documents:

Comment ID: PSLPP16/9169  Respondent: 8832257 / Jan Chapman  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

These comments are in addition to my husbands ([name redacted]) previous email of objection dated 4/7/2016 which is attached for convenience

I also attach a map of the parcel of land in question, which is the triangle of land behind Findon Lodge, 1 to 10 Christmas Hill and the 6 premises on Milkwood. Ashley house is incorrectly shown on the map.

I have researched the census records in the late 1800s and have established that properties 1-10 Christmas Hill were built prior to 1881. I suspect both Findon Lodge and the dairy on Milkwood were built then too.

It is no accident that the properties were built where they were.

Because of the ridge that runs behind these houses and is the current settlement boundary (West-East) the properties cannot be seen from the south (for example Chinthurst Hill).

The ridge immediately behind Findon lodge has been dug out at some point so that the ridge is now some metres south of the original line ------ but it is still there.
I believe the existing settlement boundary behind Christmas Hill and Shalford Village Hall should not be changed. There is no reason to change it.

If GBC decide the land behind the Village Hall is to be included in the settlement, I propose the new boundary should be as indicated by the white line shown on the attached map. The new boundary would be the ridge behind the Christmas Hill properties and the ancient path that runs from Chinthurst Hill to Shalford Common to the west of the land in question.

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

**Attached documents:** [Map.jpg](#) (111 KB)

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**Comment ID:** PSLPP16/3285  **Respondent:** 8832513 / Richard Russell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

**OBJECT** to the proposed removal of West & East Horsley from the Green Belt because the requisite "exceptional circumstances" required have NOT been demonstrated in any way and such a dramatic change would adversely impact on the streetscene and rural ambiance of the two villages. Indeed, in Paragraph 79 of the government's own National Planning Policy Framework (NPPF), it states:-

*The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.*

Furthermore, under paragraph 82 of the government's NPPF document, it states:

*The general extent of Green Belts across the country is already established.*

*New Green Belts should only be established in exceptional circumstances, for example when planning for larger scale development such as new settlements or major urban extensions. If proposing a new Green Belt, local planning authorities should:*

- demonstrate why normal planning and development management policies would not be adequate;
- set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary;
- show what the consequences of the proposal would be for sustainable development;
- demonstrate the necessity for the Green Belt and its consistency with local Plans for adjoining areas; and
- show how the Green Belt would meet the other objectives of the Framework

Furthermore, I fundamentally disagree with the Draft Local Plan's wording that "the general extent of the Green Belt has been retained". The Green Belt (including the Metropolitan Green Belt) is an invaluable asset and amenity, not just to those that live within it but to the nation as a whole and any erosion to its boundaries now will make it so much easier for others to denude it further and further as the years go by to the extent that it will be gone forever. Unconscionable as that is to me, the dilution and destruction of the Green Belt when brown field sites are not only preferable but available, indicates a disappointing lack of concern and responsibility by Guildford Borough Council.

Per the Draft Local Plan, GBC's intention is to inset no fewer than 14 villages which will inevitably have a dramatic and hugely damaging impact on the Borough. Furthermore, an approximate calculation from the information provided in the Draft Local Plan, indicates that as much as 7% of the Green Belt will be lost. Equally, slightly over 8,000 houses are planned to be built on current Green Belt designated land, of which only 14% is earmarked for Guildford.
I OBJECT and furthermore fundamentally disagree with the Local Plan's wording that "the general extent of the Green Belt has been retained". The Green Belt (including the Metropolitan Green Belt) is an invaluable asset and amenity, not just to those that live within it but to the nation as a whole and any erosion to its boundaries now will make it so much easier for others to denude it further and further as the years go by to the extent that it will be gone forever.

Unconscionable as that is to me, its dilution and destruction when brown field sites are not only preferable but available, indicates a disappointing lack of concern and responsibility by Guildford Borough Council.

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

Attached documents:

**REMOVAL OF WEST & EAST HORSLEY FROM THE GREEN BELT**

I OBJECT to the proposed removal of West & East Horsley from the Green Belt because the requisite “exceptional circumstances” required have NOT been demonstrated in any way and such a dramatic change would adversely impact on the streetscene and rural ambiance of the two villages. Indeed, in Paragraph 79 of the government’s own National Planning Policy Framework (NPPF), it states:-

The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

Furthermore, under paragraph 82 of the government’s NPPF document, it states:

The general extent of Green Belts across the country is already established.

New Green Belts should only be established in exceptional circumstances, for example when planning for larger scale development such as new settlements or major urban extensions. If proposing a new Green Belt, local planning authorities should:

- demonstrate why normal planning and development management policies would not be adequate;

- set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary;

- show what the consequences of the proposal would be for sustainable development;
• *demonstrate the necessity for the Green Belt and its consistency with Local Plans for adjoining areas; and*

• *show how the Green Belt would meet the other objectives of the Framework.*

Furthermore, I fundamentally disagree with the Draft Local Plan’s wording that “the general extent of the Green Belt has been retained”. The Green Belt (including the Metropolitan Green Belt) is an invaluable asset and amenity, not just to those that live within it but to the nation as a whole and any erosion to its boundaries now will make it so much easier for others to denude it further and further as the years go by to the extent that it will be gone forever. Unconscionable as that is to me, the dilution and destruction of the Green Belt when brown field sites are not only preferable but available, indicates a disappointing lack of concern and responsibility by Guildford Borough Council.

Per the Draft Local Plan, GBC’s intention is to inset no fewer than 14 villages which will inevitably have a dramatic and hugely damaging impact on the Borough. Furthermore, an approximate calculation from the information provided in the Draft Local Plan, indicates that as much as 7% of the Green Belt will be lost. Equally, slightly over 8,000 houses are planned to be built on current Green Belt designated land, of which only 14% is earmarked for Guildford.

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

**Attached documents:**

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**Comment ID:** PSLPP16/4356  **Respondent:** 8832513 / Richard Russell  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

**POLICY P2 – Green Belt**

I **OBJECT** and furthermore fundamentally disagree with the Local Plan’s wording that “the general extent of the Green Belt has been retained”. The Green Belt (including the Metropolitan Green Belt) is an invaluable asset and amenity, not just to those that live within it but to the nation as a whole and any erosion to its boundaries now will make it so much easier for others to denude it further and further as the years go by to the extent that it will be gone forever. Unconscionable as that is to me, its dilution and destruction when brown field sites are not only preferable but available, indicates a disappointing lack of concern and responsibility by Guildford Borough Council.

Per the Draft Local Plan, GBC’s intention is to inset no fewer than 14 villages which will inevitably have a dramatic and hugely damaging impact on the Borough. Furthermore, an approximate calculation from the information provided in the Draft Local Plan, indicates that as much as 7% of the Green Belt will be lost. Equally, slightly over 8,000 houses are planned to be built on current Green Belt designated land, of which only 14% is earmarked for Guildford.

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

**Attached documents:**

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**Comment ID:** PSLPP17/1575  **Respondent:** 8832513 / Richard Russell  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

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

I **OBJECT** because even though the reduction in the number of new homes proposed in the Green Belt following the 2016 Consultation is welcomed (90 in West Horsley, 1100 in Normandy and Flexford) it simply does not go far enough in reducing the still very large number of new dwellings proposed on the Green Belt. As a consequence, the eastern side of
the Borough is currently scheduled to take an even greater proportion of new homes in the Green Belt. This, despite having a revised Green Belt Policy P2 in the Local Plan, which clearly and categorically states that “The Metropolitan Green Belt will continue to be protected”.

I OBJECT because it is totally unacceptable that Guildford is choosing not to constrain its overall housing growth, in the way that many other Councils have done by which to protect the Green Belt. The objectively assessed housing target, though reduced since 2016 to 12,466 homes will, by 2034 (the end of the Plan Period) mean that Guildford has grown by nearly 25%. This is nearly double the Office for National Statistics prediction for the growth of Guildford.

I OBJECT because the ‘housing needs projection’ of GL Hearn have been adopted by GBC without question or analysis for the purposes of the Local Plan and they therefore fail to take into account any of the significant constraints which limit the supply of housing across the borough: in particular the large proportion of land which currently falls within the Metropolitan Green Belt. Furthermore, they also totally fail to make appropriate allowance for the already overstretched infrastructure whereas other Local Plans across the country have sensibly adjusted their housing targets to reflect such constraints whereas GBC have elected to ignore them. This, despite having a revised Green Belt Policy P2 in the Local Plan, which clearly and categorically states that “The Metropolitan Green Belt will continue to be protected”.

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

Attached documents:

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<th>Comment ID: pslp171/1576</th>
<th>Respondent: 8832513 / Richard Russell</th>
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I OBJECT because flawed evidence continues to be relied upon by GBC to justify overexpansion.

I OBJECT because GBC has seemingly completely disregarded the huge number of extremely valid objections raised by residents in regard to the 2016 Consultation and GBC’s intention to inset both West and East Horsley from the Green Belt. In total, this would mean approximately 57% of all new housing proposed in the 2017 Local Plan would be on land currently designated as Green Belt. This, despite having a revised Green Belt Policy P2 in the Local Plan, which clearly and categorically states that “The Metropolitan Green Belt will continue to be protected”.

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

Attached documents:

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<th>Respondent: 8832513 / Richard Russell</th>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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I OBJECT because flawed evidence continues to be relied upon by GBC to justify overexpansion.
I object to this proposal. Greenbelt land should remain as is for our future generations. When it's gone, it's gone. The fact that Guildford borough has such a high proportion of greenbelt land is no justification for encroachment. If developments sites cannot be found on brownfield sites then let neighboring boroughs develop.

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

In my opinion, the Metropolitan Green Belt and its special natural environment is a defining characteristic of Guildford borough and, indeed, West Horsley. I believe that there should remain a general presumption that it should be protected. It should only be sacrificed as a last resort, as once lost it can never be reclaimed.

As you will be well aware, the national policy regarding protection for the Green Belt is contained within section 9 of the NPPF. Paragraph 79 confirms that the Government attaches great importance to Green Belts.

I am concerned to note that it is still proposed that numerous villages in Guildford borough are threatened with removal from their long established Green Belt designation, including my own village of West Horsley.

Personally, I do not believe that West Horsley’s currently defined Settlement Area boundaries (ref. 2003 Local Plan) needs such a significant extension as is being proposed. In my opinion, there has not been any material change to the village’s circumstances since the adoption of the 2003 Local Plan. It is fair to say that I, and many other local residents, do not therefore agree with the proposals map or its proposed new Green Belt boundary.

In the current circumstances, I’m afraid that I find the opening paragraph of Policy P2: Green Belt; disingenuous. For GBC to state “We will continue to protect the Metropolitan Green Belt, as shown on the proposals map, against inappropriate development”, feels like some kind of bad joke.

Characteristics of the Green Belt

The main (and some could argue fundamental) aim of national Green Belt policy, which is indeed repeated verbatim by GBC in item 4.3.11, is to prevent urban sprawl by keeping land permanently open; the essential characteristics of the Green Belt being its openness and permanence.

As the Green Belt in Surrey is long established and has detailed boundaries, “exceptional circumstances” must therefore be demonstrated to necessitate any change to its boundaries. This has been, I believe, clarified by case law in Gallagher Estates Ltd v Solihull Metropolitan Borough Council (2014).
In my opinion, the proposed changes to the Green Belt boundaries in West Horsley generally, and in particular with regard to the area around the site covered by Policy A41, have not been proven by GBC to be an “exceptional circumstance”.

GBC states in item 4.3.12 that “national planning policy states that only those villages whose open character makes an important contribution to the openness of the Green Belt should be included in the Green Belt”.

It is my belief that West Horsley’s open, semi-rural character makes an important contribution to the openness of the Green Belt in this part of the borough. That was presumably also the view of our predecessors, as recently as in the adoption of the 2003 Local Plan, when they decide that West Horsley and other villages should be ‘washed over’ by the Green Belt.

You will be aware that the semi-rural landscape character of the village is greatly valued by West Horsley residents and is detailed in general terms within the Guildford Borough Council Landscape Character Assessment.

In so many ways much of the character of West Horsley is defined by the open views, (over hedges, or through fences or gates) from the roads either entering or passing through the village settlement. This is the specific and differentiating characteristic of West Horsley over our more ‘leafy’ (i.e. more trees overhanging the roads) yet more tightly developed neighbour, East Horsley, which I believe GBC and its consultants have failed to recognise or protect.

Throughout the village, stretches of undeveloped countryside on just one side of Ockham Road North, East Lane, Long Reach, Ripley Lane and, to a lesser extent, The Street reinforce this characteristic. The clearly defined precedent is of the village settlement being on one side of the route and there being open vistas across fields / meadows / farmland / horse paddocks or into woodlands on the other. This precedent should be protected not compromised by any ill-advised or inappropriate development.

Furthermore, the fact that the main vehicular traffic route through the village (along East Lane / The Street) currently benefits from a ‘green gap’ of woods and fields to the north (between The Rectory, approx. opposite Northcote Road to Grovelands Farm, beyond the railway bridge) and to the south (between Roundtree Farm and the listed Railway Cottages, at the Railway bridge) reinforces this openness. This natural green area, centred on the Lollesworth Lane / Long Reach junction, is in many ways the ‘heart and lungs’ of the village. I believe that Policy A41 of the Proposed Local Plan, detailed later, directly compromises this important amenity.

Whilst I acknowledge that the Green Belt everywhere is under pressure, I strongly believe that any linear extensions of the existing settlement boundaries should be strongly resisted, particularly where this openness is compromised.

Thus I believe that the parish of West Horsley’s open, semi-rural, character does indeed make clear and important contribution to the openness of the Green Belt in this area, and therefore I believe that, under national planning policy it should remain “washed over by” the Green Belt, rather than being “inset from the Green Belt” as proposed.

Development in the Green Belt

Policy on development with the Metropolitan Green Belt is set out in paragraphs 79 – 92 of the NPPF.

Inappropriate development is, by definition, harmful to Green Belt and paragraph 87 of the NPPF clearly states that it “should not be approved except in very special circumstances”. Furthermore paragraph 89 advises local planning authorities to “regard the construction of new buildings as inappropriate in Green Belt”.

Whilst I accept that it is possible for a local planning authority to conduct a review of Green Belt land and consider redefining boundaries which add or take away Green Belt land in order to meet these “very special circumstances”, paragraph 83 of the NPPF states, “Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.”
This paragraph clearly sets out that a Green Belt review should only happen in “exceptional circumstances”. This concept is further explained in paragraph 82 as being “for example when planning for larger scale development such as new settlements or major urban extensions”. Clearly, and even though it is currently proposed to expand the number of dwellings within the village by approx. 35%, what is proposed in West Horsley is neither a new settlement nor a major urban extension.

Furthermore, paragraph 84 of the NPPF advises that “When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary”.

As previously stated, I do not believe that GBC has channelled sustainable development towards existing urban areas and nor, furthermore, has GBC channelled it next towards any towns and villages already inset with the Green Belt.

Furthermore, I would refer you to The Guildford Borough Settlement hierarchy document (May 2014) where West Horsley is designated by GBC as falling into the category of a ‘Large Village’. Whilst I would not agree with this designation per se, even if it were to be correct, then the document states that a ‘Large Village’ is considered “unsuitable for substantial growth, but is capable of accommodating a ‘proportionate extension’”. When you then consider that the borough’s more urban and therefore intensively ‘built-up’ settlements of Guildford Town Centre and Ash & Tongham are only facing, respectively, increases of either 11% or 16% in their housing stock there is, in my opinion, no way that what is currently proposed in West Horsley could ever be considered a ‘proportionate extension’!

I note with disappointment that, within item 4.3.16 of the Proposed Local Plan, GBC states that ”We consider that exceptional circumstances exist to justify the amendment of Green Belt boundaries in order to facilitate the development that is needed and to promote sustainable patterns of development.” I do not accept this and would ask that this sentence be DELETED

Revision of the Green Belt boundaries, and removal of any land from the protection of the Green Belt status, should only be allowed after detailed and specific consideration of the individual villages and sites concerned.

I fear that the proposed ‘wholesale’ removal of West Horsley from being “washed over by the Green Belt” to being “inset within the Green Belt” will forever change the nature of our village and, once lost, the character of the village (and others including East Horsley nearby) will be nothing but a distant memory and something which our generation will undoubtedly live to regret.

I would therefore STRONGLY OBJECT to the proposals map and the proposed amendment of the Green Belt boundary around West Horsley in particular. I would ask that the proposals map be rejected, reconsidered and significantly amended.

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

Attached documents:
I would like to object to the Guildford local plan as I believe it will be a negative move for our beautiful area. The green belt should be protected at all costs.

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

I, [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] object to the proposed changes of green belt for the fields which lie behind the village...
hall in Shalford. These fields should be retained within the current green belt boundary and kept outside the village settlement boundary. These boundaries have been there for a long time and there is no valid reason for change.

This land contributes to the open character of the village and provides an attractive setting for the village’s community facilities. The elevation of this land, which is 32 feet above Kings road, is the highest in the local area and any housing development built on the land would tower over the village and surrounding area.

Access to this land is via Chinthurst Lane which is already a heavily congested, very narrow country lane.

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

Attached documents:

Comment ID: PSLPP16/11840  Respondent: 8837249 / Mary Sharp  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

The greenbelts were set up to protect our countryside. Today they are even more important to our eco system than when they were set up. We have to protect green belt areas otherwise we destroy the natural environment that we need to survive. we will eventually become baron. Building on already heavily populated area of Guildford puts strain on waste water resources.

Need more areas to build. Use areas which need improvement. Smarten the deprived areas. Leave green belt alone. If there is no room for new people in an area , provide incentives for national migration to less populated areas. Look at the law of numbers if a town is full no more can live there simple as that

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

Attached documents:

Comment ID: PSLPP16/698  Respondent: 8837281 / R Brind  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

• Housing Target. The NPPF permits SHMA numbers to be reduced to allow for wildlife areas, e.g. Green Belt, SPA and AONB, as well as lack of infrastructure, yet unlike every other Surrey Council, GBC has chosen not to apply any of these constraints leaving the Housing Target at the full 693 SHMA number. This would result in the desecration of the Green Belt as well as numerous infrastructure weaknesses.

• Green Belt Policy. The Prime Minister, David Cameron, has stated that "Green Belt land is extremely precious, protecting the lungs around our cities is paramount". Government advice is that "housing need is not adequate grounds for building on the Green Belt". It is completely unacceptable that GBC has chosen to ignore this advice.

Once land is defined as Green Belt, stated Opportunities and Benefits include:-

a) The retention of agriculture, forestry and related uses. 70% of the land at the former Wisley Airfield site is used for agriculture. There is a large crop of Maize under cultivation there now.

b) The securing of nature conservation interests. The former Wisley Airfield lies adjacent to an SSSI, the Thames Basin SPA, Ancient Woodland and is itself a Site Of Nature Conservation Importance.
GBC has failed to demonstrate the Very Special Circumstances required to remove the former Wisley Airfield from the Green Belt.

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

Attached documents:

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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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Mr. Brandon Lewis, Housing and Planning Minister has stated "Demand for housing alone will not change Green Belt boundaries". Why is GBC ignoring Government statements such as this?

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

Attached documents:

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<th>Comment ID: PSLPP16/7072</th>
<th>Respondent: 8837313 / Maria Baker</th>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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</table>

I object to not protecting the Green Belt (Policy P2)

I object to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick's Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a 'special circumstance' and the land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC's Green Belt & Countryside Report does not address Garlick's Arch, so there is no evidence base to support including this site. Rather than developing Garlick's Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

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

Attached documents:

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<th>Comment ID: PSLPP16/6806</th>
<th>Respondent: 8837377 / J Fisher</th>
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Removing the Horsleys from the Green Belt is completely incomprehensible when you take into account that the Surrey Hills are an area of outstanding beauty.
There are so many Brownfield Sites in Guildford, Dorking and Woking - in fact all the large towns have these plots of land unused and building on these would have a very small impact on the local areas.

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

Attached documents:

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**Comment ID:** PSLPP16/16921  **Respondent:** 8837729 / Harry Clarke  **Agent:** 

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

My principal objections to the Local Plan are:

- Loss of Green Belt Land contrary to ministerial statements:

Housing and Planning Minister Brandon Lewis, stated that “demand for housing alone will not change Green Belt boundaries”.

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

Attached documents:

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**Comment ID:** PSLPP16/16928  **Respondent:** 8837729 / Harry Clarke  **Agent:** 

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

1. Policy P2 - object
   1. Whilst I support the Policy in principal, I object to the detail which results in the permanent loss of undeveloped land in the Green Belt.
   2. The statement that 1.6% of land is removed from the Green Belt for development is both incorrect and also contrary to ministerial statements by the Housing and Planning Minister Brandon Lewis, who stated that “demand for housing alone will not change Green Belt boundaries”. The correct value for land removed from the Green Belt is 4% which should be properly reflected in the Local Plan.
   3. Inset boundary for Effingham has a number of technical errors. While I reluctantly support the boundary, I disagree on its boundary in a couple of places. Changes required are:
      1. Inset not following property boundary 69 Strathcona Avenue
      2. Inset not following property boundaries at 1 Beech Close and Orchard Wells.

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1. The Allotments should remain in the Green Belt.
2. Inset not following property boundaries from Yew Tree Walk to 4 Middle Farm Close (line though the middle of a building)
3. Inset not following property boundaries at Wycheme, Orestan Lane (though the middle of a field).

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1. Inset not following property boundaries at Moonshine, Effingham Common Road, and all along Lower Road (Old Village Hall, and Sir Douglas Haig cut by inset boundary). Inset should run along south side of Lower Road
2. Howard of Effingham School should be excluded from Inset. In particular it is very important that the Playing fields remain in the Green Belt. These playing fields form a very important green gap between Effingham and...
Little Bookham. GBC has classified this land as high sensitivity Green Belt. The inset must follow a natural boundary, so therefore must be on the west side of Howard of Effingham School to keep the playing fields in the Green Belt.

1. Inset on south side of Howard of Effingham Playing fields does not following any natural feature.
2. Inset not following property boundaries. All properties in Barnes Wallis Close should be included in the Inset.
3. Inset not following property boundaries. Inset should run along west side of Browns Lane and not east side.

1. Former Wisley Airfield (policy A35) is a totally inappropriate site for a very large development. The council has already rejected a proposal for this site on a large number of grounds. See further comments below.
2. Insetting of the Horsleys which extends the settlement area and results in the loss of Green Belt in Policies A38, A39, A40 and A41.
3. Insetting of Normandy and Flexford, which results in significant loss of the open countryside and Green Belt and joins the two villages either side of the Hogs Back together by Policy A46.
4. Insetting of Ripley for an isolated site (Policy A57), which is not part of the Ripley settlement.
5. Insetting of Send Marsh & Burnt Common, which takes a large piece of land out of the Green Belt (Policy A43). The inset boundary is extending beyond the settlement area of Send Marsh.
6. Insetting of Send for the loss of Green Belt (policies A42 and A44), and extending beyond the natural area of settlement.

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

Attached documents:

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Comment ID: PSLPP16/81  Respondent: 8838337 / Gregory Webb  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to GBC’s assertion that the Green Belt needs to be built upon to such a great extent.

   a.50% of the 8000 required new homes could be built on Brownfield sites

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

Attached documents:

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Comment ID: PSLPP16/16216  Respondent: 8839041 / Jon Maslin  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Policy P2 green belt

This policy states, ‘the general extent of the Green Belt has been retained.’ This is a misleading statement.

The policy wording is weak in support of the Metropolitan Green Belt even though the latter forms 89% of the borough and should be the cornerstone of all local planning policy. It is precious beyond the short-term demands of the present Government’s policy or a 15-year local plan. As noted under Policy S1 above, it is a solemn legacy to future generations.
– an asset and amenity that belongs as much to Londoners and the whole nation as to the people who live in it. Once gone it is gone forever. It is not the Council’s to give away.

Policy P2 completely fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it has been around for a long time and it needs to be permanently protected. It was actually established in a local act of parliament in Guildford under the London Home Counties (Green Belt) Act 1938 and subsequently in the 1944 Greater London Plan to contain the outward sprawl of London. The boundaries of the Green Belt through Guildford Borough were later defined in the 1987 Local Plan, forming part of a 19-24km concentric belt around London. The Green Belt is intended to check the unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and other urban land. The principles of the Green Belt designation were outlined within Planning Policy Guidance 2: Green Belts (PPG2) and are found within the National Planning Policy Framework (NPPF). The Metropolitan Green Belt is an exemplar of good planning and the envy of planners throughout the world.

Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. Building on it involves high opportunity costs, including an irreversible loss of:

1. Agricultural production
2. Rural leisure and tourism amenities
3. Water catchment
4. Flood control
5. Biodiversity
6. Natural heritage
7. A carbon sink for air pollution
8. Room for public facilities such as parks and burial grounds
9. Profitable film locations (e.g. Shere)
10. Future economic potential such as mineral extraction (even fracking)
11. Natural beauty, landmarks, open space, rural views and sight lines
12. Benefits to public health and wellbeing, physical and psychological (as well expressed in the NPPF)

As a matter of law and national and local policy, these assets should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultations.

It is quite incorrect to argue, as the Council do, that the plan would involve the loss of ‘only’ 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no ‘acceptable’ percentage (in the NPPF or anywhere else) of Green Belt that may be sold.

I object to the ‘insetting’ of 14 villages from the Green Belt. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost hell bent on self-defeat.

I believe this policy is based on a flawed Green Belt and Countryside Study that, according to one Conservative Councillor, was irregularly commissioned by Council officers without the authority of Councillors.

To ‘inset’ two thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, although they would quickly destroy them if the proposed ‘insetting’ and boundary extensions go ahead.

I object to the removal of over 400 hectares of Green Belt land in and around Blackwell Farm to facilitate further development of Surrey Research Park and for 1800 homes. Over 60 hectares were removed from Green Belt 12 years ago for the same developer (Surrey University) who has yet to fulfill their planning obligations. This valuable land has been squandered with over 17 acres of surface car parking and as one of the key features of Green belt is its ‘permanence’ this second request for yet more Green Belt land to be released in such a short space of time, with all the outstanding issues that remain makes this all the more objectionable.
Furthermore I object on grounds of the impact this development will have in terms of congestion on our highways, these issues have been highlighted under ‘infrastructure.

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

Attached documents:

Comment ID: PSLPP16/17922  Respondent: 8839105 / EHK Jones  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

**POLICY P2: Green Belt**

The statement that the Metropolitan Green Belt will continue to be protected does not appear to be adhered to in The Local Plan itself. This is particularly the case in the area close to the villages of East and West Horsley and Ockham with the Wisley site proposal. My previous objection to the Wisley development reflected concerns as to waste and infrastructure, a road network of narrow lanes with limited pavements, inappropriate density of, and excessive numbers of properties, the impact on neighbouring communities, lack of parking at local railway stations, exacerbating existing flooding problems, pollution and part of the site being of National Conservation Interest.

Further, I object to the proposals to: inset the villages of East and West Horsley from the Green Belt (para 4.3.13); disproportionate infilling of the villages, in terms of scale and density of housing and the extending of boundaries (para 4.3.16), the objective of which seems only to incorporate more unoccupied land within settlement.

The villages are rural communities, in keeping with their location within the Surrey Green Belt and ‘its openness’ - changes to their boundaries cannot be considered to be ‘exceptional circumstances’.

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

Attached documents:

Comment ID: PSLPP16/2104  Respondent: 8839521 / Lynn Yeo  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

I am writing to lodge several OBJECTIONS to developments and amendments to the Green Belt in the 2016 Draft Local Plan.

**I OBJECT to the removal of many villages throughout Guildford, including Send, Ripley, Wisley and Clandon, from the Green Belt by the process of 'insetting' (Policy P2)**

The process of insetting is an insidious way of opening up development in rural or semi-rural villages by removing significant areas of land from the Green Belt. To inset two thirds of the borough's rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is highly implausible, given the borough's location on the edge of the Metropolitan London, as well as the ever increasing towns of Woking and Guildford. There are no exceptional circumstances for removing Send, Ripley and Clandon from the Green Belt, as required by the NPPF. These villages are located in close proximity to Metropolitan London, Woking and Guildford and form a vital buffer against the merging of outer London, Woking and Guildford. Insetting will result in overdevelopment in villages which are already struggling to deal with existing pressures on infrastructure. Insetting will change the nature and character of the villages, as well as diminish the effectiveness of the Green Belt as a protective buffer against urban sprawl.
Taking Send village as an example, the insetting proposed will remove the playing fields for the village's schools from the Green Belt. This may result in building over valuable outdoor space for our children. The inset in Send also includes a significant 2km stretch along the picturesque River Wey (a conservation area) from Triggs Lock to High Bridge. It is currently subject to Policy G11 of the Local Plan where the special character of the landscape and views are to be protected and improved. Removing this area from the Green Belt through insetting would have a negative effect on the setting and amenity of the River Wey and is contrary to the policies of the NPPF for heritage protection as well as the stated intention of the local plan to protect and enhance the historic environment. The River Wey is a valuable amenity for all the residents of Guildford and visitors from further afield and should be retained in the Green Belt for the benefit of all current and future residents of Guildford.

I OBJECT to the development of Green Belt land without exceptional circumstances (Policy P2)

The proposals for large scale developments at Wisley (A35), Garlick's Arch (A43 and A43a), Gosden Farm (A25) and Blackwell Farm (A26) and Normandy (A46) would result in wholesale destruction of Green Belt, stretching all along the A3 from the M25 at Wisley down past the A31 at the Hogs Back. These developments will have a significant negative impact on the environment through the destruction of green spaces and increase in pollution and traffic. They will also contribute to urban sprawl by creating significant built up areas which erode the Metropolitan Green Belt by allowing development in a corridor from the M25, along the A3, to the A31.

8,086 new houses are planned from the Green Belt but only 1,135 for Guildford urban area. This imbalance in building on Green Belt sites over brownfield ones will not only destroy the countryside but also disincentives much needed urban regeneration. For example, adjacent to Garlick's Arch (A43), there was an existing brownfield site at Burnt Common (which was included in the last draft but removed from this one) which could have been developed. Instead, this plan proposes building on a site that contains Ancient Woodland, over the development on a nearby brownfield site. This shows the plan does not prioritise the development of brownfield sites over Green Belt sites. The building of dormitory satellite settlements on Green Belt sites will is an out of date approach to planning due to the enormous negative environmental impacts. There are no exceptional circumstances for for development of this Green Belt land, which serves as an important buffer to urban sprawl. The government published Planning Practice Guidance (2014) to accompany and give further detail to the policies in the NPPF. The guidance states that "Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt.” Therefore according to NPPF, GBC has not demonstrated any exceptional circumstances to warrant such large scale development in the Green Belt.

Due to the reasons stated above,

I OBJECT to the inclusion of site A25.

I OBJECT to the inclusion of site A26.

I OBJECT to the inclusion of site A35.

I OBJECT to the inclusion of site A43.

I OBJECT to the inclusion of site A43a.

I OBJECT to the inclusion of site A46.

I would like my comments to be seen by the Inspector.

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

Attached documents:

Comment ID: pslp171/1975  Respondent: 8839521 / Lynn Yeo  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
7) I OBJECT to Policy P2

I object to the changes to Policy P2 because they have not addressed many of the 32,000 objections made to the 2016 plan.

I object to the new para (1) “The Metropolitan Green Belt will continue to be protected as shown designated on the Policies Map, against inappropriate development. In accordance with national planning policy, the construction of new development will be considered inappropriate and will not be permitted unless very special circumstances can be demonstrated.” The words “as shown designated on the Policies Map” should be deleted. The Policies Map has effectively ignored huge areas of Green Belt protection and the new para (1) is therefore a sham.

Policy P2 still completely fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it has been around for a long time and it needs to be permanently protected. It was actually established in a local act of parliament in Guildford under the London Home Counties (Green Belt) Act 1938 and subsequently in the 1944 Greater London Plan to contain the outward sprawl of London. The boundaries of the Green Belt through Guildford Borough were later defined in the 1987 Local Plan, forming part of a 19-24km concentric belt around London. The Green Belt is intended to check the unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and other urban land. The principles of the Green Belt designation were outlined within Planning Policy Guidance 2: Green Belts (PPG2) and are found within the National Planning Policy Framework (NPPF). The Metropolitan Green Belt is an exemplar of good planning and the envy of planners throughout the world.

It is incorrect to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold. No-one argues that we should sell 1.6% of the Crown jewels in order to build houses.

I object to the statement in the Draft Local Plan under Green Belt Policy P2 (4.3.13) which claims that Send and a further list of 13 villages are “now inset from the Green Belt”. This statement is untrue as GBC is proposing to “inset” these villages. No decision has been made by an Inspector, therefore the villages remain in the Green Belt.

I am deeply disturbed that settlement boundaries are to be hugely extended in many villages (particularly at Send) and that infilling is also proposed outside the settlement boundaries of 11 further villages. This is completely unplanned and unmeasured development outside of the OAN.

Many Guildford villages are “leggy” in outline, reflecting the effect of ribbon development (often along just one side of existing roads) permitted between the Wars. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development. Send is a good example of villages that should not be removed from the Green Belt. Send provides an important Green Belt buffer between Woking and Guildford. It is true that Send comprises old ribbon development but this should not mean it can be removed from the Green Belt so that Woking joins up to Guildford.

I object to three particularly vulnerable areas of high quality amenity land being taken out of the Green Belt at Send which include: 1) The land behind the schools including playing fields and woodland. 2) The land to the right of Cartbridge by the River Wey Navigation up to the new boundary fence with Vision Engineering. 3) Land to the left of Cartbridge going up to the old depot on the Wey Navigation.

Exceptional circumstances must be demonstrated in order to develop the Green Belt. Despite the weight of public opinion against weakening of this policy, 70% of new housing development will be in the countryside, of which, 58% will be in Greenbelt. By definition, this is not an exception and no attempt is made to demonstrate exceptional circumstances, in line with the requirements of the NPPF. Major sites such as Garlick's Arch, Blackwell Farm, Wisley Airfield and Gosden Hill Farm – are in the Green Belt. Previous consultations show that, in line with the NPPF, the public would prefer to use brownfield land in the urban area first.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I am writing to lodge several OBJECTIONS to developments and amendments to the Green Belt in the 2016 Draft Local Plan.

**I OBJECT to the removal of many villages throughout Guildford, including Send, Ripley, Wisley and Clandon, from the Green Belt by the process of "insetting" (Policy P2)**

The process of insetting is an insidious way of opening up development in rural or semi-rural villages by removing significant areas of land from the Green Belt. To inset two thirds of the borough's rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is highly implausible, given the borough's location on the edge of Metropolitan London, as well as the ever increasing towns of Woking and Guildford. There are no exceptional circumstances for removing Send, Ripley and Clandon from the Green Belt, as required by the NPPF. These villages are located in close proximity to Metropolitan London, Woking and Guildford and form a vital buffer against the merging of outer London, Woking and Guildford. Insetting will result in overdevelopment in villages which are already struggling to deal with existing pressures on infrastructure. Insetting will change the nature and character of the villages, as well as diminish the effectiveness of the Green Belt as a protective buffer against urban sprawl. It may be that the inset replaces the settlement boundary of the current local plan, but it more than replaces it, it makes the village much larger.

Taking Send village as an example, the insetting proposed will remove the playing fields for the village's schools from the Green Belt. This may result in building over valuable outdoor space for our children. The inset in Send also includes a significant 2km stretch along the picturesque River Wey (a conservation area) from Triggs Lock to High Bridge. It is currently subject to Policy G11 of the Local Plan where the special character of the landscape and views are to be protected and improved. Removing this area from the Green Belt through insetting would have a negative effect on the setting and amenity of the River Wey and is contrary to the policies of the NPPF for heritage protection as well as the stated intention of the local plan to protect and enhance the historic environment. The River Wey is a valuable amenity for all the residents of Guildford and visitors from further afield and should be retained in the Green Belt for the benefit of all current and future residents of Guildford.

**I OBJECT to the development of Green Belt land without exceptional circumstances (Policy P2)**

The proposals for large scale developments at Wisley (A35), Garlick's Arch (A43 and A43a), Gosden Farm (A25) and Blackwell Farm (A26) and Normandy (A46) would result in wholesale destruction of Green Belt, stretching all along the A3 from the M25 at Wisley down past the A31 at the Hogs Back. These developments will have a significant negative impact on the environment through the destruction of green spaces and increase in pollution and traffic. They will also contribute to urban sprawl by creating significant built up areas which erode the Metropolitan Green Belt by allowing development in a corridor from the M25, along the A3, to the A31.

8,086 new houses are planned from the Green Belt but only 1,135 for Guildford urban area. This imbalance in building on Green Belt sites over brownfield ones will not only destroy the countryside but also disincentives much needed urban regeneration. For example, adjacent to Garlick's Arch (A43), there was an existing brownfield site at Burnt Common (which was included in the last draft but removed from this one) which could have been developed. Instead, this plan proposes building on a site that contains Ancient Woodland, over the development on a nearby brownfield site. This shows the plan does not prioritise the development of brownfield sites over Green Belt sites. The building of dormitory satellite settlements on Green Belt sites will is an out of date approach to planning due to the enormous negative environmental impacts. There are no exceptional circumstances for development of this Green Belt land, which serves as an important buffer to urban sprawl. The government published Planning Practice Guidance (2014) to accompany and give further detail to the policies in the NPPF. The guidance states that "Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the ‘very special circumstances’
justifying inappropriate development on a site within the Green Belt.” Therefore, according to NPPF, GBC has not demonstrated any exceptional circumstances to warrant such large scale development in the Green Belt.

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

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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
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I object to the changes to Policy P2 from the latest draft of the Guildford Local Plan, specifically:

I object to the new para (1) “The Metropolitan Green Belt due to unjustified alteration of Green Belt boundaries within the referred to Policies Map.

Policy P2 still completely fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it has been around for a long time and it needs to be permanently protected. It was actually established in a local act of parliament in Guildford under the London Home Counties (Green Belt) Act 1938 and subsequently in the 1944 Greater London Plan to contain the outward sprawl of London. The boundaries of the Green Belt through Guildford Borough were later defined in the 1987 Local Plan, forming part of a 19-24km concentric belt around London. The Green Belt is intended to check the unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and other urban land. The principles of the Green Belt designation were outlined within Planning Policy Guidance 2: Green Belts (PPG2) and are found within the National Planning Policy Framework (NPPF). The Metropolitan Green Belt is an exemplar of good planning and the envy of planners throughout the world. These documents should be referenced as Key Evidence in policy P2.

With this draft of the local plan the borough stands to lose 7% of its Green Belt when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold. The council’s figure of 1.6% is erroneous.

I object to the statement in the Draft Local Plan under Green Belt Policy P2 (4.3.13) which claims that Send and a further list of 13 villages are “now inset from the Green Belt”. This statement is untrue as GBC is proposing to “inset” these villages. No decision has been made by an Inspector, therefore the villages remain in the Green Belt.

I am deeply disturbed that settlement boundaries are to be hugely extended in many villages (particularly at Send) and that infilling is also proposed outside the settlement boundaries of 11 further villages. This is completely unplanned and unmeasured development outside of the OAN.

Many Guildford villages are “leggy” in outline, reflecting the effect of ribbon development (often along just one side of existing roads) permitted between the Wars. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development. Send is a good example of villages that should not be removed from the Green Belt. Send provides an important Green Belt buffer between Woking and Guildford. It is true that Send comprises old ribbon development but this should not mean it can be removed from the Green Belt so that Woking joins up to Guildford.

I object to four particularly vulnerable areas of high quality amenity land being taken out of the Green Belt at Send which include: 1) The land behind the schools including playing fields and woodland. 2) The land to the north and east of Cartbridge (A247) by the River Wey Navigation up to the new boundary fence with Vision Engineering. 3) Land to the south and east of Carbridge going up to the old depot on the Wey Navigation. 4) Land at Send Business Park on Tannery Lane.
Exceptional circumstances must be demonstrated in order to develop the Green Belt. Despite the weight of public opinion against weakening of this policy, 70% of new housing development will be in the countryside, of which, 58% will be in Greenbelt. By definition, this is not an exception and no attempt is made to demonstrate exceptional circumstances, in line with the requirements of the NPPF. Major sites such as Garlick's Arch, Blackwell Farm, Wisley Airfield and Gosden Hill Farm – are in the Green Belt. Previous consultations show that, in line with the NPPF, the public would prefer to use brownfield land in the urban area first.

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

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<th>Respondent: 8839553 / David Burnett</th>
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I OBJECT to the proposal to inset Send Business Park from the Green Belt, Policy P2, 4.3.15 ?

A portion of this site, known as Site 67 in the 2014 draft was deleted from all subsequent versions because of all the objections made and there has not been any change in circumstances which would support the reintroduction and expansion of the site.

This Green Field site lies within 5km of the Thames Basin Heaths Special Protection Area.

Many of the industrial / office buildings here were built without permission in an area of outstanding countryside adjacent to the beautiful Wey Navigation. Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate. It is in a high sensitivity area of Green Belt on the banks of the River Wey, opposite some water meadows, adjacent to a Conservation Area and close to a SSSI. It is not clear why the ‘high sensitivity’ Green Belt designation given to this site in the 2016 version of the plan has been removed in order to inset Send Business Centre and the adjoining land from the Green Belt.

I object to the removal of Send Business Park from the Green Belt, (I cite specifically NPPF 79). I find this policy contrary to NPPF 83, since ‘exceptional circumstances’ have not been demonstrated to justify altering Green Belt boundaries. I find this policy contrary to NPPF 87 & 88 due to the fact that ‘very special circumstances’ have not been met.

There is highly restricted vehicular access along Tannery Lane in both directions. This road narrows to a single lane track in sections and would not be able to cope with any significant increase in vehicular traffic.

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

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<table>
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<th>Comment ID: PSLPP16/7601</th>
<th>Respondent: 8840161 / Richard Ayears</th>
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</table>

1. I object to the loss of Green Belt for development and that insufficient use of urban and brownfield land results in permanent loss of Green Belt as over 70% of new housing being prosed is within the Green Belt. The greater use of urban brownfield sites will produce more homes in the urban areas where people work and will reduce the carbon footprint of those commuting into Guildford as public transport is readily available. This change will improve the environmental impacts of the plan.
2. I object to the distribution of new developments being in the north of the borough in that area which lies outside the AOB although still in the Green Belt. Sites should be made available in the AOB, smaller scale development and in particular Rural Exception would allow these communities to grow and relieve pressure on the other areas. Greater use of Rural exception developments should be made to ensure truly affordable homes for local people in some of the most expensive parts of the county. The target of 90 RE homes is far too low. Rural Exception development should be encouraged across the borough.

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

Attached documents:

Comment ID: PSLPP16/7603  Respondent: 8840161 / Richard Ayears  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the insetting of the villages out of the Green Belt as this does not follow the principles of the NPPF. I do agree that some insetting is appropriate i.e. Send Prison but the open vista of some villages has not been given sufficient weight. The plan does not identify the “exceptional circumstances” for the changes proposed.

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

Attached documents:

Comment ID: PSLPP16/16113  Respondent: 8840161 / Richard Ayears  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the loss of Green Belt for development and that insufficient use of urban and brownfield land results in permanent loss of Green Belt as over 70% of new housing being prosed is within the Green Belt. The greater use of urban brownfield sites will produce more homes in the urban areas where people work and will reduce the carbon footprint of those commuting into Guildford as public transport is readily available. This change will improve the environmental impacts of the plan.

b. I object to the distribution of new developments being in the north of the borough in that area which lies outside the AOB although still in the Green Belt. Sites should be made available in the AOB, smaller scale development and in particular Rural Exception would allow these communities to grow and relieve pressure on the other areas. Greater use of Rural exception developments should be made to ensure truly affordable homes for local people in some of the most expensive parts of the county. The target of 90 RE homes is far too low. Rural Exception development should be encouraged across the borough.

I object to the insetting of the villages out of the Green Belt as this does not follow the principles of the NPPF. I do agree that some insetting is appropriate i.e. Send Prison but the open vista of some villages has not been given sufficient weight. The plan does not identify the “exceptional circumstances” for the changes proposed.

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

Attached documents:

Comment ID: pslp171/2318  Respondent: 8840161 / Richard Ayears  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
I object to the removal in para 4.3.18 of “where it would not have a greater impact on the openness.” and the replacement by “subject to the impact”. This is completely in contravention of the purposes of the green belt.

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

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<td>PSLPP16/7800</td>
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<td>I object to your proposal to remove the Horsleys from the green belt. Your own P2 policy promises to protect the green belt. You have not demonstrated the required exceptional circumstances before taking this action.</td>
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<td>I object to the extension of the boundaries of the Horsley’s settlement areas. No sound reason has been given for the proposed changes.</td>
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<td>PSLPP16/13677</td>
<td>8840193 / David K Reynolds</td>
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<td>• We object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.</td>
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<td>PSLPP16/950</td>
<td>8840289 / Esther Hayes</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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<td>I also object to West and East Horsley and Ripley Villages being removed from the Green Belt. These are beautiful villages that attract visitors to the area. If they are subjected to urbanisation they will cease to be the open, attractive, places they are today. They need to be protected from disproportionate development, not re-classified so that they can become urban extensions of London and Guildford.</td>
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I am truly aghast and object most strongly to the NEW Local Plan to invade the precious GREEN BELT and change irreversibly the character of our semi-rural villages, with blind indifference to the wishes of local residents.

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

Policy P2: Green Belt and the countryside

7.1. I OBJECT to this policy for the following reasons:

7.1.1. It is completely illogical on the one hand to say that “you will continue to protect the Metropolitan Green Belt” when in fact you are proposing to put 65% of all new developments in the Green Belt!

7.1.2. No “exceptional circumstances” are offered in support of removing elements of the Green Belt

7.1.3. I do not see that the proposals take sufficient account of the use that can be made of existing Brown Belt for housing. Your reasoning seems to be that the Brown Belt will be used for business and industry, and so we must scrap parts of the Green Belt to build more houses. This is weak planning. Put preservation of the Green Belt at the top of the priorities, and plan for less growth overall, then there will be sufficient room on the Brown Belt for housing.

7.2. Consequently I OBJECT generally to the removal or insetting of villages from the Green Belt, and also to the proposed settlement boundary changes, and particularly in the cases of East Horsley, Effingham, Jacobs Well, Ripley, Send, Send Marsh/ Burnt Common, and West Horsley.

7.2.1. The Southwestern part of West Horsley is a small village dating back to the Saxons. It is adjacent to the National Trust Hatchlands Estate, and also has 41 listed buildings. Part of West Horsley is in a Conservation Area.

7.2.2. It now consists predominantly of a number of mixed, and generally quite old, houses along either side of a long road, the Street. There are some small developments, again of mixed housing, on adjoining roads. There are two old traditional pubs, one towards the north (dating back to c. 1500) and the other towards the south (dating back to pre-1800). There are a couple of village shops. Further to the south, Shere Road is again a long road going up towards the North Downs Way, and with a variety of housing either side, pretty well all with direct views to the countryside.

7.2.3. In other words, most of West Horsley is a typical small, old village. Indeed, if from any house you cannot see directly to the surrounding countryside, it is not more than a one-minute walk to enjoy the wonderful rural views.

7.3. I OBJECT to the proposed density and numbers of houses to be built in both West and East Horsley.
7.4. I OBJECT to the proposed “limited in-filling” in the areas near the villages of West Horsley and East Horsley and to the inclusion within this of the areas to the South of the A246 close to these villages.

7.5. I OBJECT to the removal of Wisley from the Green Belt.

7.6. In particular I OBJECT to the proposal to build 385 homes in West Horsley. That would represent a colossal percentage increase in the number of houses in West Horsley South and would completely destroy its rural village nature.

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

Attached documents:

Comment ID: pslp171/433  Respondent: 8840449 / David Wilson  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY P2 Green Belt Policy
The policy promises that “The Metropolitan Green Belt will continue to be protected”. However, despite minor changes I OBJECT to the fact that it continues to propose to inset both the villages of West and East Horsley from the Green Belt. There is no justification for this approach. Both West and East Horsley make an important contributions to the Green Belt of this area. If the villages are INSET then the openness of the area will be destroyed.

West and East Horsley are in the front line for protecting the spread of Metropolitan sprawl outside of the M25, and insetting them will irremediably damage the green belt protection.

Furthermore, I OBJECT to the fact that the Eastern side of the Borough is scheduled to now to have an even greater proportion of new houses in the Green Belt.

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

Attached documents:

Comment ID: PSLPP16/10779  Respondent: 8842433 / Wendy Osorio  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing to object to various aspects of the Local Plan. Having attended many meetings and read many documents and reports, there are still many parts which remain unclear.

I fully accept that there is a need for more housing, in particular Affordable Housing which means just that - not houses that are still totally out of reach for many today and the same applies to Social Housing and the lack of it.

However, the Green Belt is vitally important and once destroyed, is obviously irretrievable and lost for ever for present and future generations. It never ceases to amaze me that Guildford Borough Council in particular has been and still is, incredibly strict with regard to all planning issues and the granting of permissions however small which is in keeping with the historic planning restrictions yet when developers submit plans for vast numbers of houses which apparently comprise the "Vision" which seems little more than an urban sprawl stretching over large areas, all restrictions seem to be totally irrelevant especially where Green Belt is concerned. The fact that the Local Plan is amenable to destroying ancient woodland at Garlick's Arch is appalling - why is it that the Brownfield sites are not better utilised such as the one at Burnt Common as opposed to housing at Garlick's Arch.
I object to Policy P2 green belt. This policy states, “the general extent of the Green Belt has been retained.” This is completely false. There are no exceptional circumstances presented to justify changes to any of the green belt boundaries in this plan. Policy P2 completely fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it has been around for a long time. As a matter of law and national and local policy, these assets should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultations. I object to the “insetting” of 14 villages from the Green Belt, and at “infilling” of 12 of the borough’s Green Belt villages. I am deeply disturbed that settlement boundaries are to be hugely extended in many villages and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many of the boundaries are not logical or defendable for the duration of the plan and beyond. Site in Horsley, for example are being brought into the new village boundary/inset village on the basis that they contribute nothing to the “openness” of the Green Belt. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost hell bent on self-defeat. Land is being opportunistically included in new village boundaries. An example of this is the new site in Horsley Policy 41. This is a perverse inclusion being late and clearly not strategically aligned to defendable green belt boundaries. The site is included by deviating the permanent and defendable green belt boundary of East Lane to the Street and Long Reach into an open field, following some hedges and trees only for it to return to the same boundary of East lane some 100m further along. The only logical and defendable boundary here would be to continue it all the way along East Lane without deviation off it. A41 passes all the test of the Green belt as does the land on 3 sides of it which are proposed to remain in the Green Belt and outside the Village boundary. There are no exceptional circumstances for this site to be proposed for 90 houses and the green belt and village boundary should not be changed to incorporate it. Land to the southern part of Horsley on the 46 near Horsley Place is being included by changing the same current village boundary twice instead of taking its current course. There are no exceptional circumstances for doing so. The parish of West Horsley should be retained in the Green Belt and not washed over as with its conservation areas and rural setting set it apart from the more developed area of East Horsley.
### Comment ID: PSLPP16/5860  Respondent:  8844257 / Jennifer and Michael Dodd  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

1) The exceptional circumstances required to take the Horsleys out of the Green Belt do not appear to have been proved. The Green Belt is the most valuable protection we all have to prevent uncontrolled urban sprawl and MUST not be given up lightly.

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

Attached documents:

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### Comment ID: PSLPP16/5861  Respondent:  8844257 / Jennifer and Michael Dodd  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

2) Whilst there is clearly unfulfilled Housing Need in the area which must be addressed it is not in itself a Special Circumstance needed to upset the Green Belt and the Housing needs requirement shown seems to be arbitrary and unproven.

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

Attached documents:

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### Comment ID: PSLPP16/7347  Respondent:  8845025 / A Henderson  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

In November 2013 I felt compelled to send a letter in response to the possibility of proposed housing developments on Green Belt Land in West and East Horsley, It now seems that the majority of our heartfelt protestations have been totally disregarded.

As to their statement that it is lower quality Green Belt land and is an urban area preferable to other Green Belt land is ludicrous. It is preferable for their interests but not for those who chose to live in this beautiful area and pay for that privilege. The land concerned is at the start of the Surrey Hills. Residents have invested time and money to keep our village and surrounding area in good order.

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

Attached documents:

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### Comment ID: PSLPP16/16840  Respondent:  8845345 / Mike Bailey  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

I object to the plan on the grounds of the loss to green belt land. The Mayor of London has instructed London planners not to approve development on Green Belt Land within the M25. If we continue to build on our countryside it won’t be many decades before we have none left. Creeping development has led to almost continuous housing from Central London to Effingham. Is this to carry on to Guildford and beyond? (1,700 houses are planned for the Guildford end of the Hogs Back and 1,000 new houses on greenfield sites in Normandy.

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

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<th>Comment ID: PSLPP16/15962</th>
<th>Respondent: 8845697 / Inga Johnson</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing to express my strong objection the recent plans as per the new Guildford Local Plan to remove the villages of East and West Horsley from the protection of Green Belt status.

The Green Belt was set up for a number of specific purposes all of which are being threatened by the latest housing expansion planned for the villages of East and West Horsley. These purposes include to restrict the sprawl of built-up areas, prevent neighbouring towns from merging into one another, safeguard the countryside from encroachment, preserve the character and setting of historic towns and to assist in urban regeneration by encouraging the recycling of brownfield sites. I believe that if development is allowed on any part of the Green Belt it sets a precedent, which can no longer be contained. No exceptional circumstances have been demonstrated why Green Belt land should be used therefore Green Belt should mean and remain Green Belt.

Green Belt land is also hugely fundamental for our capital city giving London’s huge population access to open countryside, attractive landscapes, nature and outdoor recreation such as the hugely successful Surrey Cycle race which has become and annual event. Are the London population as a whole now to suffer from what could potentially become a sprawl of the city into the Green Belt?

The scale proposed by this new plan specifically in West Horsley would increase the size of the village by 35% which would not only change the character of the village and cause a move toward it merging with East Horsley, but there is not enough infrastructure in the villages themselves to cope. The roads are already pot holed and busy during peak times. As a commuter into central London I am aware that the very tightly packed Horsley station car park is always full. The local school ‘The Raleigh’ is oversubscribed and I know residents of both Horsley’s are not guaranteed school places for their children here. The one medical centre in East Horsley is always busy with a queue forming outside every morning for local residents to guarantee emergency appointments. This is already an appalling situation, which will not be improved or catered for if the numbers of residents were to almost double.

I would also like to draw your attention to the re-proposed plans to develop on Wisley Airfield again a Green Belt site with historic interest. The added strain on the infrastructure of both the Horsleys as mentioned above and Ockham is insurmountable. Ockham itself would merge with this new development again disregarding the need to preserve the character of our villages. In turn I believe it would have a huge impact on RHS Wisley a site of national importance and significance by damaging its context and immediate surroundings. Finally a development so close to two major Motorways (M25 & M3) and the A3 would not be a good environment for its new residents with the high noise and pollution levels. The additional traffic to this site would also pose a safety risk to drivers in the area as at present there is often a build up of traffic at the Wisley interchange which backs up to the Ockham junction making it an already congested and dangerous junction to both enter and exit.

In short the local community is strongly opposed to any development plans on local Green Belt land and I believe that these (including myself) are the first people that should be consulted and listened to when any plans are considered. The
proposed development for the Horsleys is significantly greater than anywhere else which quite frankly appears to be an unconsidered and lazy way to allocate new housing sites within the borough.

I have lived in Surrey all of my life and would like to continue to enjoy the open space it provides, which not only the local residents visit to enjoy. If we do not restrict the growth into Green Belt land now it will be too late for future generations to get any of it back.

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

Attached documents:

Comment ID: pslp171/1913  Respondent: 8845697 / Inga Johnson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing to express my strong objection the recent Guildford Borough Council Proposed Submission Local Plan to build 395 new houses in the villages of East and West Horsley hence removing them from the protection of Green Belt status. The Green Belt was set up for a number of specific purposes all of which are being threatened by the latest housing expansion planned for the villages of East and West Horsley. These purposes include to restrict the sprawl of built-up areas, prevent neighbouring towns from merging into one another, safeguard the countryside from encroachment, preserve the character and setting of historic towns and to assist in urban regeneration by encouraging the recycling of brownfield sites. I believe that if development is allowed on any part of the Green Belt it sets a precedent, which can no longer be contained. No exceptional circumstances have been demonstrated why Green Belt land should be used therefore Green Belt should mean and remain Green Belt.

Green Belt land is also hugely fundamental for our capital city giving London’s huge population access to open countryside, attractive landscapes, nature and outdoor recreation such as the hugely successful Surrey Cycle race which has become and annual event. Are the London population as a whole now to suffer from what could potentially become a sprawl of the city into the Green Belt? The scale proposed by this new plan specifically in West Horsley would increase the size of the village by 40% which would not only change the character of the village and cause a move toward it merging with East Horsley, but there is not enough infrastructure in the villages themselves to cope. The roads are already pot holed and busy during peak times. As a commuter into central London I am aware that the very tightly packed Horsley station car park is always full. The local school ‘The Raleigh’ is oversubscribed and I know residents of both Horsley’s are not guaranteed school places for their children here. The one medical centre in East Horsley is always busy with a queue forming outside every morning for local residents to guarantee emergency appointments. This is already an appalling situation, which will not be improved or catered for if the numbers of residents were to almost double.

In short the local community has always been strongly opposed to any development plans on local Green Belt land and I believe that these (including myself) are the first people that should be consulted and listened to when any plans are considered. The proposed development for the Horsleys is significantly greater than anywhere else which quite frankly appears to be an unconsidered and lazy way to allocate new housing sites within the borough.

I have lived in Surrey all of my life and would like to continue to enjoy the open space it provides, which not only the local residents visit to enjoy. If we do not restrict the growth into Green Belt land now it will be too late for future generations to get any of it back.

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

Attached documents:

Comment ID: PSLPP16/873  Respondent: 8845729 / John.P Burge  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Green Belt. Much is made of the statement that "We will continue to protect the Metropolitan Green Belt" while at the same time removing Green Belt protection from villages and then expanding their settlement boundaries. The claim to protect the Green Belt is thus hypocritical and at a stroke Guildford Borough Council (GBC) has failed in its duties to those who live here.

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

Attached documents:

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Comment ID: PSLPP16/4088  Respondent: 8846177 / Moira Tailby  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

Re: Guildford Borough Proposed Submission Local Plan: strategy and sites: June 2016

I am writing to OBJECT to the Guildford Local Plan (GLP 2016) referred to above, in particular with reference to the effect it would have on East and West Horsley.

The development proposed is blatantly opposed to the spirit and intent of the Green Belt: this is clear from such documents as the National Planning Policy Framework and other planning guidelines.

The ‘insetting’ of villages such as West Horsley and the moving of Green Belt boundaries is an insidious method of eroding the protected countryside and destroying the protection which the Green Belt was intended to provide.

The proposed use of Green Belt land is considerably greater than the development proposed on brownfield and urban sites. Is this because developers prefer to use virgin land?

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

Attached documents:

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Comment ID: PSLPP16/7128  Respondent: 8846433 / Carol Cox  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

Green Belt Planning Policy

I write to object to the proposal to remove the Green Belt from this area.

We have all been privilege to live in this area of outstanding natural beauty which should be protected for future generations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to the draft Local Plan for the following key reasons:

I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

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

Comments on Proposed Submission Local Plan

I wish to strongly object to Guildford Borough Councils (GBC) Draft local plan, which would see an increase in housing in Ockham and the Horsleys of approximately 77%, most of that development taking place on Greenbelt land.

It is staggering to think that on the one hand, you pronounce GBC's policy to be the protection of the Metropolitan Green Belt, although the Housing policies that GBC have set out would see 65% of that development on Green belt. A massive contradiction indeed.

These figures of increased population and therefore an increased need for housing were based on population projections that were out of date and inaccurate and which massively overestimated Guildford Borough's population growth. Indeed, now that we seem to be leaving the EU, they'll clearly be less pressure on housing, reducing the need for development.

It is craziness to remove East and West Horsley and 14 other villages from the Green belt, because once you remove that protection, there is no going back and this part of the world risks being ruined forever by unnecessary overdevelopment.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
After the many and cogent objections that had been made to the original local plan it is disappointing that the new local plan retains so many of its features.

The attack on the green belt is an unwelcome undermining of one of the key achievements of planning legislation in the last century. This created a unique amenity and environmental protection for residents both of Surrey and of London. The approach proposed would threaten a piecemeal diminution of the green belt and would open the way for further depredations in the next planning round.

In addition the application of concepts such as ‘contribution to the openness of the green belt’ is inadequately defined and apparently inconsistent. It is difficult in some cases to believe that the authors have actually been to the sites on which they are pronouncing and no convincing justification is provided.

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

Attached documents:

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Comment ID: pslp171/1277  Respondent: 8847553 / Antony and Judith Heane  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

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

I wish to object to the proposal that Normandy and Flexford settlements; Walden Cottages and Palm House Nurseries should be inset from the Green Belt.

All the land within Normandy and Flexford contributes to the ‘openness’ of the Green Belt and should, therefore, remain ‘washed over’.

I am very concerned that residents here are already being approached by developers who are interested in purchasing part of their gardens.

Are you aware of this?

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

Attached documents:

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Comment ID: PSLPP16/6613  Respondent: 8847585 / E Brigitte Christensen-Collins  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

Th Green Belt was an act of parliament, created for the pleasure and benefit to people living inside and outside London by avoiding London and nearby towns and villages to sprawl.

The act has been successful and admired by town and city planners around the world.

The amount of high density housing, which is proposed to be built within a few years in West Horsley, is out of character and damaging for our village and the Green Belt.

West Horsley is in an area of great beauty which should be preserved for future generations. I therefore strongly oppose the local plan.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1944  Respondent: 8848033 / Paul Gerrard  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( No )

4.3.12 I object to villages being "inset" from the Green Belt. There is still no legal definition of "openness" or even national guidance on it, and its use is highly spurious. If, according to the Green Belt and Countryside Study, lack of openness can be defined by inability to view open land due to hedgerows, rising topography, trees and woodland, then most of the Green Belt itself is not "open". Hedgerows, hills, trees and woodland are all part of the Green Belt funny enough. By such logic, does it mean that if villages take the simple step of lowering all their fences to "contribute to the openness" of the Green Belt, everybody can stay in the Green Belt??

What is the real justification for changing the status of a large number of villages from "washed-over" to "inset"? Surely Guildford Borough Council went through all this for the 2003 plan and it was a deliberate decision to define these villages as "washed-over", since the "inset" designation already existed long before the NPPF. When I asked this question in a previous consultation, the reply was "the NPPF no longer gives us this choice". This cannot be true if, as the government keeps telling us and the NPPF confirms, Green Belt policies have not changed. So what else has prompted the change? Or is there actually guidance from central government to weaken the aims of Green Belt protection? The previous guidance in PPG2 already permitted controlled infilling for washed-over villages. So why is this suddenly insufficient with the NPPF? "Inset" on the other hand allows limited development (more than infilling) or even limited expansion. If boundaries are expanded once, what is there to stop these new boundaries being expanded again later on, and then expanded again ad infinitum? In other words it allows the risk of creeping urban sprawl that Green Belt policy is supposed to prevent, and obviously has a much greater effect on the villages themselves and surrounding Green Belt and SPAs/SSSIs.

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

Attached documents:

Comment ID: PSLPP16/2209  Respondent: 8848033 / Paul Gerrard  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( No )

4.3.16 I oppose the changes to the Green Belt. The boundaries were already established and well defined, so what exactly are the "exceptional circumstances" here? I suggest the housing targets are excessive and arbitrarily influenced by government pressure to solve a national population problem, not by local need, and are therefore not exceptional circumstances.

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

Attached documents:

Comment ID: PSLPP16/12091  Respondent: 8848641 / Helen Feary  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I am writing to OBJECT to the above on the following grounds:

POLICY P2 Green Belt - I OBJECT to this policy because:

Despite the fact that Green Belt Local Plan Policy P2 states that 'We will continue to protect the Metropolitan Green Belt', the analysis included in the Appendix shows that around 65% of the developments proposed in the Proposed Submission Local Plan are to be built on land currently within the Metropolitan Green Belt. Under National Planning Policy Framework (NPPF) rules, GBC is permitted to make allowance for factors which may constrain the delivery of new housing, such as the need to protect the Metropolitan Green Belt or the restrictions required to protect the Surrey Hills Area of Outstanding Natural Beauty ('AONB') which is offered protection under the NPPF comparable to that of a national park. Although these areas make up a large proportion of the land area of Guildford Borough, GBC makes no attempt to reduce its housing delivery in order to take account of such constraints.

Paragraph 4.3.13: 'Proposal to inset East Horsley from the Green Belt' proposes that East Horsley should be inset from the Green Belt, instead of being 'washed over’ as it is today. Currently development is permitted within the settlement boundary, although this area is still considered to be Green Belt with a particular planning regime being applicable. East Horsley is set in a rural location and the village has the look and feel of a rural village. Its Green Belt status has been a key factor in preserving that character. Moreover, being ‘washed over’ by the Green Belt has not been a serious constraint on development within the village. GBC’s planning records indicate that 149 net new homes were added to the village housing stock through in-filling and brownfield developments between 2000 and 2015. GBC attributes the need to inset East Horsley to NPPF requirements, arguing that the test for remaining ‘washed over’ is that the village should make an important contribution to the openness of the Green Belt. This East Horsley clearly does. There are a number of woodlands within the village and the average housing density is just 8.1 dwellings per hectare ('dph'). Woodlands and large residential gardens make a vital contribution towards biodiversity, provide wildlife corridors, and provide the open spaces that are vital to the character of the greenbelt. You only have to visit the village to see this and therefore I OBJECT to the proposal to inset East Horsley from the Green Belt and ask that this proposal be dropped from the Local Plan.

Paragraph 4.3.16 'Settlement Boundary changes in East Horsley'

GBC are proposing to make a number of changes to the settlement boundaries of East Horsley and so expand the settlement area. I object to two boundary changes: the first, to move the East Horsley settlement boundary west from behind the houses on the west side of Ockham Road North up to the eastern boundary of Lollesworth Wood. This removes over 5 hectares of agricultural fields from the Green Belt. Under NPPF rules Green Belt boundaries should only be changed in ‘exceptional circumstances’. We do not believe this proposal can be considered as an exceptional circumstance as the only justification for this change is to bring a large field within the settlement area in order to provide more housing land. Under NPPF rules this is not a sufficient justification for changing a Green Belt boundary. As such, I OBJECT to this proposed boundary change.

There is also a proposal to move the East Horsley settlement boundary westwards from behind the houses on the west side of Kingston Avenue up to a tree line running along the Parish Boundary at the western edge of Kingston Meadows. The result is to take all of Kingston Meadows out of the Green Belt. Kingston Meadows is the main public recreational space of East Horsley, comprising various sports facilities and playing fields and I therefore OBJECT to this proposed boundary change.

In the Green Belt & Countryside Study and its accompanying Topic Paper, GBC justifies the need to make changes in settlement boundaries in order to meet unfulfilled housing need in the Borough. However, Green Belt rules make it clear that unfulfilled housing need is not normally considered to be ‘an exceptional circumstance’. If it were the entire Green Belt would already be covered in tarmac. The NPPF is clear that every movement in settlement boundaries must be justified by ‘exceptional circumstances’. GBC have offered only a generic justification in their Topic Paper of meeting unfulfilled housing need, but a case by case justification has not been provided. As such, we believe the settlement boundary changes referred to above (and many others) are invalid without such detailed justification.

Paragraph 4.3.17: Proposal to remove Wisley Airfield from the Green Belt

I OBJECT to the proposal to remove Wisley Airfield from the Green Belt.
Under the NPPF, development on such Green Belt land is only permitted under ‘very special circumstances’. GBC’s Planning Officer, in assessing a previous planning application for this site, rejected the application on the grounds that: “It has not been demonstrated that the benefits of the proposal amount to very special circumstances such as to clearly outweigh the harm to the Green Belt and the other harm identified”.

Ministerial guidance has repeatedly confirmed that unfulfilled housing need does not qualify as a very special circumstance. Removal of this site from the Green Belt is totally against its rules, regulations and underlying spirit. The site location at the edge of the M25 circle represents a ‘first line of defence’ against metropolitan encroachment into the Surrey countryside. If this site is developed then it becomes only a question of time before Guildford itself is absorbed into the sprawling London conurbation.

POLICY P2: Limited In-filling

A new planning designation has been introduced called ‘the identified boundary of the village’. For East Horsley this covers a number of roads south of the A246. It is a sizeable area, covering 45 hectares, the equivalent of 23% of the present Settlement Area of the village. Within this area, Policy P2 sets out proposals that would allow ‘limited in-filling’ within this boundary. It is hard to reconcile this with the opening statement of Policy P2 that “We will continue to protect the Metropolitan Green Belt”. Accordingly I OBJECT to the proposal to designate roads south of the A246 as being within the ‘identified boundary of the village’ and to allow limited infilling within this area.

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

Attached documents:
I therefore OBJECT to the proposal to inset East Horsley from the Green Belt and requests that this proposal be dropped from the Local Plan.

1. b) Paragraph 4.3.16 and Proposals Map: Settlement Boundary changes in East Horsley

GBC are proposing to make a number of changes to the settlement boundaries of East Horsley and so expand the settlement area, as set out in the Proposals Map, with the justifications seemingly provided in the Green Belt & Countryside Study prepared by the consultants, Pegasus.

We object to two specific boundary changes, which have been proposed, as follows:

3

1. There is a proposal to move the East Horsley settlement boundary westwards from behind the houses on the west side of Ockham Road North up to the eastern boundary of Lollesworth. This proposal removes over 5 hectares of agricultural fields from the Green Belt. The present boundary line is clearly defined by a deep and well-maintained drainage ditch which is classified by the Environment Agency as a 'main river line' and therefore represents a highly defensible Green Belt boundary.

Moving this boundary west to the edge of woodland in no way improves its defensibility. Under NPPF rules Green Belt boundaries should only be changed in 'exceptional circumstances'. We do not believe this proposal can be considered as an exceptional circumstance. Clearly the only justification for this change is to bring a large agricultural field within the settlement area in order to provide more housing land. However, under NPPF rules this is not a sufficient justification for changing a Green Belt boundary. As such, I believe it is an invalid proposal.

I accordingly OBJECT to this proposed boundary change.

1. There is also a proposal to move the East Horsley settlement boundary westwards from behind the houses on the west side of Kingston Avenue up to a tree line running along the Parish Boundary at the western edge of Kingston Meadows. The result is to take all of Kingston Meadows out of the Green Belt.
Kingston Meadows is the main public recreational space of East Horsley, comprising various sports facilities and playingfields. The present settlement boundary is clearly defined by a deep and well maintained drainage ditch running along its eastern side. It therefore represents a very defensible Green Belt boundary. Moving this boundary westwards to the edge of woodland in no way improves its defensibility. Under NPPF rules Green Belt boundaries should only be changed in 'exceptional circumstances'. I do not believe that this can be considered as an exceptional circumstance. As such we believe this is an invalid proposal.

I accordingly OBJECT to this proposed boundary change.

In the Green Belt & Countryside Study and its accompanying Topic Paper, GBC justifies the need to make changes in settlement boundaries in order to meet unfulfilled housing need in the Borough. However, Green Belt rules make it clear that unfulfilled housing need is not normally considered to be 'an exceptional circumstance'. If it were the entire Green Belt would already be covered in tarmac.

The NPPF is clear that every movement in settlement boundaries must be justified by 'exceptional circumstances'. GBC have offered only a generic justification in their Topic Paper of meeting unfulfilled housing need, but a case by case justification has not been provided. As such, I believe the settlement boundary changes referred to above (and many others) are invalid without such detailed justification.

1. c) Paragraph 4.3.17: Proposal to remove Wisley Airfield from the Green Belt I OBJECT to the proposal to remove Wisley Airfield from the Green

The only justification for this proposed change is unfulfilled housing need which is not considered an exceptional circumstance. The proposed Wisley development is discussed further below in the Site Allocation section.

d) POLICY P2: Limited In-filling

A new planning designation has been introduced called 'the identified boundary of the village'. For East Horsley this covers a number of roads south of the A246. It is a sizeable area, covering 45 hectares, the equivalent of 23% of the present Settlement Area of the village. Within this area, Policy P2 sets out proposals that would allow 'limited in-filling' within this boundary.

I find it hard to reconcile the opening statement of Policy P2 that "We will continue to protect the Metropolitan Green Belt" with this sizeable reduction in effective Green Belt status. In my opinion, this policy represents a de facto extension of the Settlement Boundary and a substantial reduction in the operational effectiveness of the Green Belt, whose effectiveness is significantly weakened where this new planning designation applies.

I accordingly OBJECT to the proposal to designate roads south of the A246 as being within the 'identified boundary of the village' and to allow limited infilling within this area.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1491  Respondent: 8850465 / Colin Chandler  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

> It is ridiculous to remove East and West Horsley and 14 other villages from the Green belt, because once you remove that protection, there is no going back and this part of the world risks being ruined forever by unnecessary overdevelopment.

>  

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

Attached documents:

Comment ID: PSLPP16/16294  Respondent: 8850689 / J Reardon Smith  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

Green Belt (Policy P2):  I OBJECT most strongly to the insetting of 14 villages from the Green Belt and the proposal that infilling is acceptable within a further 12 villages within the Green Belt. Green Belt is supposed to be protected as a matter of national and local policy but this policy seeks to justify development in a supposedly protected area, in breach of local manifesto commitments and contrary to previous responses to public consultation. I believe that this proposal is wholly wrong and, if allowed to go ahead, it will detrimentally change - irretrievably - the local area enormously. The Green Belt was set up for a very specific reason and by statute … it was designed to be the "lungs of London" and to prevent urban sprawl. Once gone, it will be lost forever, is precious and cannot be replaced.

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

Attached documents:

Comment ID: PSLPP16/13393  Respondent: 8850817 / Sandra Woods  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

I object to the changes to Green Belt boundaries which is not justified by any special circumstances. All the Green Belt sites meet the five purposes of the Green Belt.

I object to the strategic sites in the local plan including Blackwell Farm, 3 Farms Meadows, Garlick's Arch, West Horsley and Hog's Back. All are disproportionate to the surrounding areas and none qualify for the exceptional circumstances required to take them out of the Green Belt.
**Comment ID:** PSLPP16/16371  **Respondent:** 8850881 / N Reardon Smith  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

Green Belt: I OBJECT, in the strongest possible terms, to the insetting of 14 villages from the Green Belt and the proposal that infilling is acceptable within a further 12 villages within the Green Belt. Green Belt is supposed to be protected as a matter of national and local policy but this policy seeks to justify development in a supposedly protected area. This is in breach of local manifesto commitments and contrary to previous responses to public consultation. I believe that this proposal is wholly wrong and, if allowed to go ahead, it will detrimentally change - irretrievably - the local area enormously. The Green Belt was set up for a very specific reason and by statute ... it was designed to be the "lungs of London" and to prevent urban sprawl. Once gone, it will be lost forever, is precious and cannot be replaced.

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

**Attached documents:**

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**Comment ID:** PSLPP16/13323  **Respondent:** 8850945 / Richard Bayes  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

**POLICY P2: Green Belt**

Local Plan Policy P2 states that: ‘We will continue to protect the Metropolitan Green Belt’. I fully support this policy. Unfortunately, despite such a statement, GBC appears to be in breach of this policy itself through the housing policies that it has set out in the Local Plan. Analysis shows that approximately 65% of the developments proposed in the Proposed Submission Local Plan are to be built within the Metropolitan Green Belt. I consider this outcome to be unworkable. Under NPPF rules, GBC is permitted to make allowance for factors which may constrain the delivery of new housing, such as the need to protect the Metropolitan Green Belt or the restrictions required to protect the Surrey Hills Area of Outstanding Natural Beauty (‘AONB’) which is offered protection under the NPPF comparable to that of a national park. Although these areas make up a large proportion of the land area of Guildford Borough, GBC makes no attempt to reduce its housing delivery in order to take account of such constraints. I find this approach inexplicable.

1. **Paragraph 4.3.13: Proposal to inset East Horsley from the Green Belt**

Policy P2 proposes that East Horsley should be inset from the Green Belt, instead of being ‘washed over’ as it is today. Currently development is permitted within the settlement boundary, although this area is still considered to be Green Belt with a particular planning regime being applicable. East Horsley is set in a rural location and the village has the look and feel of a rural village. Its Green Belt status has been a key factor in preserving that character. Moreover, being ‘washed over’ by the

Green Belt has not been a serious constraint on development within the village. For example, GBC’s planning records indicate that no less than 149 net new homes were added to the village housing stock through in-filling and brownfield developments between 2000 and 2015. GBC attributes the need to inset East Horsley to NPPF requirements, arguing that the test for remaining ‘washed over’ is that the village should make an important contribution to the openness of
the Green Belt. This East Horsley clearly does. No less than 36% of East Horsley is composed of woodlands, whilst inside the settlement area there is an average housing density of just 8.1 dwellings per hectare (‘dph’). Woodlands and large residential gardens make a vital contribution towards biodiversity, provide wildlife corridors, and furnish those open spaces which are vital to the character of
the greenbelt. It is one thing for a planner to study a map and see a settlement area filled with housing, but it is quite another actually to come to a rural village like East Horsley and see how the Green Belt has preserved the rural character and openness of this village. Today East Horsley is a picturesque and flourishing rural community, which has and continues to experience steady incremental growth as a result of being ‘washed over’ by the Green Belt.

I therefore object to the proposal to inset East Horsley from the Green Belt and I request that this proposal be dropped from the Local Plan.

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

Attached documents:

Comment ID: PSLPP16/13325  Respondent: 8850945 / Richard Bayes  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. d) POLICY P2: Limited In-filling

A new planning designation has been introduced called ‘the identified boundary of the village’. For East Horsley this covers a number of roads south of the A246. It is a sizeable area, covering 45 hectares, the equivalent of 23% of the present Settlement Area of the village. Within this area, PolicyP2 sets out proposals that would allow ‘limited in-filling’ within this boundary. I find it hard to reconcile the opening statement of Policy P2 that “We will continue to protect the Metropolitan Green Belt” with this sizeable reduction in effective Green Belt status. In my opinion,
this policy represents a de facto extension of the Settlement Boundary and a substantial reduction in the operational effectiveness of the Green Belt, whose effectiveness is significantly weakened where this new planning designation applies.

I vehemently object to the proposal to designate roads south of the A246 as being within the ‘identified boundary of the village’ and to allow limited infilling within this area.

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

Attached documents:

Comment ID: PSLPP16/6501  Respondent: 8850977 / Sam Pinder  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I oppose the proposal to build houses on the Green Belt without demonstrating the “exceptional circumstances” that are required for this
- Currently, exceptional circumstances are required to build on the Green Belt. No exceptional circumstances have been given here, therefore these proposals should not be allowed to go ahead as they are against the NPPF.
- At last year’s General Election, the Conservative party, which currently controls GBC, pledged to protect the Green Belt. The Local Plan is a betrayal of that promise and of those people who voted for the Conservatives on this basis. I feel massively let down by this “new” DLP, after expecting that the content would have fundamentally changed from what was previously proposed, I find it is very similar and just as devastating for the borough, as it was previously.

- It is misleading for the DLP to start with a statement about protecting the Green Belt when this DLP does anything but.

- It sounds like stating the obvious, but you can’t put the Green Belt back once you’ve built all over it.

- I understand that the Raleigh School are now looking to relocate their school to one of the proposed development sites for West Horsley. I also object to this as there are, once again, no exceptional circumstances here to build on the Green Belt.

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

Attached documents:

Comment ID: PSLPP16/6506  Respondent: 8850977 / Sam Pinder  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

I oppose the plans to take many rural villages, including East and West Horsley, out of the Green Belt

- No justification has been given to take these two villages, along with many others, out of the Green Belt, other than it will make it easier for these areas to be developed. The whole point of the Green Belt was to act as a buffer between London and rural areas and it should be protected and left alone, not built on.

- I object to these plans because I do not feel that GBC has demonstrated the need to take these villages out of the Green Belt, as I don’t think GBC has explored all possible Brownfield options available to them, before using the Green Belt.

- The villages that you are proposing taking out of the Green Belt are very different, with some, such as West Horsley, much more rural than others (89% of West Horsley is Green Belt land – surely that is sufficient argument alone to leave it in the Green Belt). I cannot understand why GBC has not taken a more sophisticated approach to this process, looking at taking parts of villages out of the Green Belt, depending on the existing make up. To lump all of these villages in together makes no sense. I object to the blanket proposal to remove all of these villages from the Green Belt. I would argue that if some development is necessary, in each of these areas, that parts of these villages, should be considered for insetting and not the whole village. If you look at a village like West Horsley, some parts of it are so rural and within the AONB – it makes no sense to remove the village in full from the Green Belt.

I hope that having seen the overwhelming evidence against the proposals to build so many houses on the Green Belt, you will reconsider. I trust that the Planning Inspector will see that there is no justification for building far more houses than are required, for not applying the constraints that are allowed, for building on the Green Belt without exceptional circumstances and for burdening Surrey’s rural villages with such a large percentage of the overall proposed housing figure. This draft Local Plan is not compliant with the principles and policies of the NPPF and should be stopped.

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

Attached documents:

Comment ID: PSLPP16/12853  Respondent: 8851233 / Helen Bayes  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**POLICY P2: Green Belt**

Local Plan Policy P2 states that: ‘We will continue to protect the Metropolitan Green Belt’. I fully support this policy. Unfortunately, despite such a statement, GBC appears to be in breach of this policy itself through the housing policies that it has set out in the Local Plan. Analysis shows that approximately 65% of the developments proposed in the Proposed Submission Local Plan are to be built within the Metropolitan Green Belt. I consider this outcome to be unworkable. Under NPPF rules, GBC is permitted to make allowance for factors which may constrain the delivery of new housing, such as the need to protect the Metropolitan Green Belt or the restrictions required to protect the Surrey Hills Area of Outstanding Natural Beauty (‘AONB’) which is offered protection under the NPPF comparable to that of a national park. Although these areas make up a large proportion of the land area of Guildford Borough, GBC makes no attempt to reduce its housing delivery in order to take account of such constraints. I find this approach inexplicable.

1. **a) Paragraph 4.3.13: Proposal to inset East Horsley from the Green Belt**

I object to the proposal to inset East Horsley from the Green Belt and I request that this proposal be dropped from the Local Plan.

Policy P2 proposes that East Horsley should be inset from the Green Belt, instead of being ‘washed over’ as it is today. Currently development is permitted within the settlement boundary, although this area is still considered to be Green Belt with a particular planning regime being applicable. East Horsley is set in a rural location and the village has the look and feel of a rural village. Its Green Belt status has been a key factor in preserving that character. Moreover, being ‘washed over’ by the Green Belt has not been a serious constraint on development within the village. For example, GBC’s planning records indicate that no less than 149 net new homes were added to the village housing stock through in-filling and brownfield developments between 2000 and 2015. GBC attributes the need to inset East Horsley to NPPF requirements, arguing that the test for remaining ‘washed over’ is that the village should make an important contribution to the openness of the Green Belt. This East Horsley clearly does. No less than 36% of East Horsley is composed of woodlands, whilst inside the settlement area there is an average housing density of just 8.1 dwellings per hectare (‘dph’). Woodlands and large residential gardens make a vital contribution towards biodiversity, provide wildlife corridors, and furnish those open spaces which are vital to the character of the greenbelt. Today East Horsley is a picturesque and flourishing rural community, which has and continues to experience steady incremental growth as a result of being ‘washed over’ by the Green Belt.

1. **b) Paragraph 4.3.16 and Proposals Map: Settlement Boundary changes in East Horsley**

I agree with East Horsley Parish Council on this issue.

I therefore object to this proposed boundary change.

1. **i) There is also a proposal to move the East Horsley settlement boundary westwards from behind the houses on the west side of Kingston Avenue up to a tree line running along the Parish Boundary at the western edge of Kingston Meadows. The result is to take all of Kingston Meadows out of the Green Belt.**

Under NPPF rules Green Belt boundaries should only be changed in ‘exceptional circumstances’. I do not believe that this can be considered as an exceptional circumstance. As such I do not believe this is a valid proposal.

I therefore object to this proposed boundary change.
The NPPF is clear that every movement in settlement boundaries must be justified by ‘exceptional circumstances’. GBC have offered only a generic justification in their Topic Paper of meeting unfulfilled housing need, but a case by case justification has not been provided. As such, I believe the settlement boundaries are invalid without such detailed justification.

1. c) Paragraph 4.3.17: Proposal to remove Wisley Airfield from the Green Belt

I object to the proposal to remove Wisley Airfield from the Green Belt. The only justification for this proposed change is unfulfilled housing need which is not considered an exceptional circumstance.

1. d) POLICY P2: Limited In-filling

I strongly object to the proposal to designate roads south of the A246 as being within the ‘identified boundary of the village’ and to allow limited infilling within this area.

A new planning designation has been introduced called ‘the identified boundary of the village’. For East Horsley this covers a number of roads south of the A246. It is a sizeable area, covering 45 hectares, the equivalent of 23% of the present Settlement Area of the village. Within this area, Policy P2 sets out proposals that would allow ‘limited in-filling’ within this boundary. I find it hard to reconcile the opening statement of Policy P2 that “We will continue to protect the Metropolitan Green Belt” with this sizeable reduction in effective Green Belt status. In my opinion, this policy represents a de facto extension of the Settlement Boundary and a substantial reduction in the operational effectiveness of the Green Belt, whose effectiveness is significantly weakened where this new planning designation applies. The Green Belt has preserved the rural character of East Horsley and prevented urban sprawl across a rural landscape.

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

Attached documents:

Comment ID: PSLPP16/6600  Respondent: 8852001 / SJ Haines  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

Policy P2 Green Belt

With specific regard to East Horsley which is a rural village in the Green Belt. Since 2000, nearly 150 new houses have been built through in filling and brownfield developments. The proposal to move settlement boundaries in order to exclude agriculture fields and public recreational area (Kingston Meadow) from the Green Belt, can only be to make room for more housing. I am led to believe that under NPPF rules that this is not sufficient justification on for changing a Green Belt boundary. I OBJECT TO THIS PROPOSAL ON THE GROUNDS THIS WOULD BE A BREACH OF NPPF RULES.

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

Attached documents:

Comment ID: PSLPP16/3091  Respondent: 8852289 / John F. Wood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I am writing to object strongly to the Proposed Local Plan, which my MP has described as “Not fit for purpose.”

I object to the use of Green Belt land for development. The Government has stipulated that only under exceptional circumstances can Green Belt land be used. Exceptional circumstances have not been proved.

I object to ANY of our villages being taken out of the Green Belt. Former Conservative Governments created the Green Belt, to provide a “Lung for London” and to prevent the urban sprawl that this Local Plan is proposing. Once villages are taken out of the Green Belt, it is the thin end of the wedge and by 2050 Guildford will be connected to London.

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

Attached documents:

Comment ID: pslp171/1501  Respondent: 8852321 / David Hart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

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

Specifically, as stated on page 5, the revision reduces the proportion of green belt land to be allocated for development from 1.6% to 1.5%. Whilst I applaud the direction of the change, it is still only a tiny step towards the 0% I wish to see.

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

Attached documents:

Comment ID: PSLPP16/11007  Respondent: 8852641 / Ian Draper  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

I OBJECT to all insetting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley.

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

Attached documents:

Comment ID: PSLPP16/6077  Respondent: 8853025 / Charles Gibson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

1. I object to the removal of Send and Ripley from the Green Belt because the villages and their countryside provides a necessary buffer between Woking and Guildford. One of the purposes of the Green Belt is the prevention of merging of towns and settlements thereby creating unrestricted sprawl. If these villages were removed from the Green Belt in time there would be continuous development between Woking and Guildford. 70% of the sites put forward in the Local Plan are in the Green Belt which flies in the face of current government planning policy. The National Planning Policy Framework (NPPF), National Planning Policy Guidance and case law make it clear that Green Belt is an absolute constraint on housing supply. Exceptional circumstances need to be shown to adjust boundaries. They have not been
shown by Guildford Borough Council. I object to Policy P2 green belt which states that “the general extent of the Green Belt has been retained.” This is completely false.

1. I object to the building on the Green Belt at Send at Garlick’s Arch, Clockbarn Nurseries and Send Hill because it is not justified by any special circumstances and the fact that Green Belt is meant to be permanent and not continually eroded.

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

Attached documents:

Comment ID: PSLPP16/16861  Respondent: 8853025 / Charles Gibson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

I object to the removal of Send and Ripley from the Green Belt because the villages and their countryside provides a necessary buffer between Woking and Guildford. One of the purposes of the Green Belt is the prevention of merging of towns and settlements thereby creating unrestricted sprawl. If these villages were removed from the Green Belt in time there would be continuous development between Woking and Guildford. 70% of the sites put forward in the Local Plan are in the Green Belt which flies in the face of current government planning policy. The National Planning Policy Framework (NPPF), National Planning Policy Guidance and case law make it clear that Green Belt is an absolute constraint on housing supply. Exceptional circumstances need to be shown to adjust boundaries. They have not been shown by Guildford Borough Council. I object to Policy P2 green belt which states that “the general extent of the Green Belt has been retained.” This is completely false.

I object to the building on the Green Belt at Send at Garlick’s Arch, Clockbarn Nurseries and Send Hill because it is not justified by any special circumstances and the fact that Green Belt is meant to be permanent and not continually eroded.

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

Attached documents:

Comment ID: PSLPP16/7263  Respondent: 8854273 / D.G. Peters  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

I am opposed from unjustified Green Belt development.

Development must always be made on Brown field sites before any Green sites are even considered.

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

Attached documents:

Comment ID: PSLPP16/7451  Respondent: 8854305 / A_P Latham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Within the Plan, the boundaries of the settlement areas of the Horsleys have been extended. No sound or logical reason has been provided. Its purpose seems to be an increase in land available for future additional development.

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

**Attached documents:**

**Comment ID:** PSLPP16/7454  **Respondent:** 8854305 / A_P Latham  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

This proposal to remove the Horsleys from the Green Belt requires "exceptional circumstances". These have not been demonstrated.

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

**Attached documents:**

**Comment ID:** PSLPP16/13852  **Respondent:** 8854785 / Desmond McCann  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

I realise that the following list of objections will probably have been sent to you by many people, but I can assure you that I have read them carefully, and I believe they give a succinct summary of my views on the proposals, I have lived in Send for over 30 years, and I have lived in Guildford Borough for considerably longer than that. I have never before seen a set of proposals so calculated to cause chaos and to destroy the character of large swathes of Guildford. You should be ashamed at putting them forward.

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

**Attached documents:**

**Comment ID:** pslp171/1380  **Respondent:** 8854785 / Desmond McCann  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

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

1. I object to the extended development in the Green Belt (Policy P2, Site A43) I object to Garlick's Arch (A43) being extended with the corresponding destruction of the Green Belt. There are no exceptional circumstances for this site being removed from the Green Belt, as required by the National Planning Policy.

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

**Attached documents:**

**Comment ID:** pslp171/1381  **Respondent:** 8854785 / Desmond McCann  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

12. I object removing Send Business Park from the Green Belt (4.3.15). Send Business park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for it's insetting (removal) from the Green Belt, and indeed GBC have not even attempted one. Therefore no "exceptional circumstances", as required by the NPPF can be claimed.

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

Attached documents:

Comment ID: PSLPP16/2840   Respondent: 8854977 / Susan Lukey   Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1) I am against any large scale development on green belt land around Guildford. We love our Guildford for its unique, balanced, happy mix of town and country. This is why we live here. We will be devastated if large scale development is allowed.

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

Attached documents:

Comment ID: PSLPP16/11117   Respondent: 8855425 / Mary Teague   Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I write to record my strong opposition to the draft local plan.

I am one of the very many local residents who wrote to you two years ago and whose reasonable objections appear to have been completely ignored.

Firstly, no objective evidence is offered of any "exceptional circumstances" justifying the removal of The Horsleys from the Green Belt and the development this would allow. Building more houses, particularly without proper planning for infrastructure (parking, roads, medical facilities, schools) would irreparably damage the semi-rural character of these villages. There appears to be a wholly inadequate consideration of the impact of the draft plan on the Horsleys and their existing residents and tax-payers to whom the Borough Council is supposed to be accountable.

I object strenuously to the proposal that the area south of the A246 be included within the newly proposed village boundary. The proposal appears to be a cover to enable future infilling which would truly destroy the rural nature of this area.

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

Attached documents:

Comment ID: PSLPP16/10591   Respondent: 8855969 / Jonathan Murphy   Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to not protecting the Green Belt {Po}
I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield {A35} and Garlick's Arch {A43}. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a 'special circumstance' and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC's Green Belt & Countryside Report does not address Garlick's Arch, so there is no evidence base to support including this site.

Rather than developing Garlick's Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

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

Attached documents:
I object to:

1. Erosion of the Green Belt
2. I object to any insetting (removal) of villages from the green belt

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

I find it incredible that the green belt policy can suddenly be dismissed to allow excessive housebuilding in our E. Horsley village

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

I object to Wood Street Village being inset from the Greenbelt. There are no exceptional circumstances to inset.

The village makes an important contribution to the Openness of the Greenbelt. The Greenbelt was established to prevent Urban Sprawl.

Wood Street Village is separated from Guildford by a slither of common land. Development in Wood Street Village would be Urban Sprawl.

I object to the proposed insetting of a traveler site in Wood Street as it is a retrospective way of allowing Planning Permission that has been refused.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

Moving the Horsleys out of the greenbelt.
I have in my life chosen both urban living and rural living.
Both have their merits but the beauty is that we have a choice.
The Horsleys are attractive to me at this time because they are in the green belt and all the benefits that that gives.
In time i will move back to urban living to secure all the benefits that that can bring but your intentions remove the democratic right i have to make that choice.

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

Attached documents:

Comment ID: PSLPP16/10358  Respondent: 8856993 / Maxine Higgins  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

Removal from Green Belt of Horsleys, Ripley etc.

Green Belt is there to prevent urbanisation and should not be reduced or removed unless absolutely necessary. It should be sacrosanct. Even exceptional circumstances such as a new home for the Howard of Effingham school (which was not actually building on unspoiled green belt but rather on old farm buildings) were recently not considered to be exceptional enough by your own planning committee so I am unable to see the justification here. As noted by your own officer - 'this would be the thin edge of the wedge' and lead to increased, sprawling urbanisation, which if additional housing is the main objective, could be achieved without such drastic measures.

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

Attached documents:

Comment ID: PSLPP16/16934  Respondent: 8857185 / Tim Parker  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

The loss of green belt in the surrounding area - it's gone forever.

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

Attached documents:

Comment ID: PSLPP16/2506  Respondent: 8858113 / Ramsey Nagaty  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )
GBC state they will protect the Green Belt but propose major developments on the Greenbelt and removal of Greenbelt boundaries which were only moved some 10-13 years ago, hardly complying to a situation of permanence for Greenbelt boundaries. The boundary extension at Manor Farm to the edge of Blackwell farm only took place 10-13 years ago. Now it is proposed to move it again with a boundary that cannot in any way be considered defensible being the edge of a field that cannot be seen from midway in the same field!

There seems to have been predetermination in the manoeuvring of the review of AONB to try and exclude Blackwell Farm despite the earlier Surrey Hills paper to extend AONB across the complete site.

Reference is made to the Guildford Urban area but Blackwell Farm is set in countryside and fulfills perfectly all the reasons for Greenbelt and comprises AONB and AGLV land yet GBC seek to take out a major portion of Blackwell Farm from the Greenbelt.

GBC have failed to enforce the agreements including for Blackwell farm to be designated a park for the people of Guildford as agreed when the adjacent Manor Farm was taken out of the greenbelt.

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

Attached documents:

Comment ID: PSLPP16/17752  Respondent: 8858113 / Ramsey Nagaty  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Guildford Local Plan as presented. It is fundamentally flawed and based on a discredited draft local plan which has been extended and tweeked but remains built on the same weak and shaky foundations of the earlier plan. The plan is driven by a quest for growth and development that has not been put to the electorate, during the last local elections the Conservative party did not put in their election literature such policy but quite the reverse with headlines that Conservatives Protect The Greenbelt, yet the Local Plan has increased from the Draft Plan the amount of land to be taken out of the Greenbelt to be developed for housing . I request that the objections made below are put to the Inspector appointed by the Secretary of State to review the GBC Regulation 19 draft local plan. A spokesperson on my behalf or I myself will be pleased to speak in respect of these issues.

I request that once all objections are fully taken into consideration the draft plan is amended accordingly and re-issued.

Guildford is a constrained borough by the reality of having 89% of its area zoned as permanent Green Belt and an out of date road network that is already at capacity. I am concerned that GBC have adopted an inflated OAN of 13,860 homes as a housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance.

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

Attached documents:
I object to Policy P2 green belt

This policy states, “the general extent of the Green Belt has been retained.” We do not accept this statement.

The policy wording is weak in support of the Metropolitan Green Belt even though the latter forms 89% of the borough and should be the cornerstone of all local planning policy. It is precious beyond the short-term demands of the present Government’s policy or a 15-year local plan. As noted under Policy S1 above, it is a solemn legacy to future generations – an asset and amenity that belongs as much to Londoners and the whole nation as to the people who live in it. It is an inalienable public good. Once gone it is gone forever. It is not the Council’s to give away.

Policy P2 completely fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it has been around for a long time and it needs to be permanently protected. It was actually established in a local act of parliament in Guildford under the London Home Counties (Green Belt) Act 1938 and subsequently in the 1944 Greater London Plan to contain the outward sprawl of London. The boundaries of the Green Belt through Guildford Borough were later defined in the 1987 Local Plan, forming part of a 19-24km concentric belt around London. The Green Belt is intended to check the unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and other urban land. The principles of the Green Belt designation were outlined within Planning Policy Guidance 2: Green Belts (PPG2) and are found within the National Planning Policy Framework (NPPF). The Metropolitan Green Belt is an exemplar of good planning and the envy of planners throughout the world.

Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. Building on it involves high opportunity costs, including an irreversible loss of:

1. Agricultural production
2. Rural leisure and tourism amenities
3. Water catchment
4. Flood control
5. Biodiversity
6. Natural heritage
7. A carbon sink for air pollution
8. Room for public facilities such as parks and burial grounds
9. Profitable film locations (e.g. Shere)
10. Future economic potential such as mineral extraction (even fracking)
11. Natural beauty, landmarks, open space, rural views and sight lines
12. Benefits to public health and wellbeing, physical and psychological (as well expressed in the NPPF)

As a matter of law and national and local policy, these assets should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultations.

It is quite incorrect to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold. No-one argues that we should sell 1.6% of the Crown jewels in order to build houses.

I object to the “insetting” of 14 villages from the Green Belt, and at “infilling” 12 of the borough’s Green Belt villages. I am deeply disturbed that settlement boundaries are to be hugely extended in many villages and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are “leggy” in outline, reflecting the effect of ribbon development (often along just one side of existing roads) permitted between the Wars. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost hell bent on self-defeat.
I believe this policy is based on a flawed Green Belt and Countryside Study that, according to one Conservative Councillor, was irregularly commissioned by Council officers without the authority of Councillors.

To “inset” two thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. We cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, although they would quickly destroy them if the proposed “insetting” and boundary extensions go ahead. This policy is wildly disproportionate in terms of any foreseeable development need (especially post-Brexit) and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/2649</th>
<th>Respondent: 8858113 / Ramsey Nagaty</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

10 POLICY P2 GREEN BELT
10.1 I object to the changes to Policy P2 because they have not addressed many of the 32,000 objections made to the 2016 plan.

10.2 I object to the new para (1) “The Metropolitan Green Belt will continue to be protected as shown designated on the Policies Map, against inappropriate development. In accordance with national planning policy, the construction of new development will be considered inappropriate and will not be permitted unless very special circumstances can be demonstrated.” The words “as shown designated on the Policies Map” should be deleted. The Policies Map has effectively ignored huge areas of Green Belt protection and the new para (1) is therefore a sham.

10.3 I object to the proposed change that Send Business Park should be inset from the Green Belt due to the fact that:

10.4 It is effectively a non-conforming user in an area of beautiful countryside adjacent to the beautiful Wey Navigation

10.5 It has restricted access along Tannery Lane

10.6 It should not be given the opportunity for further expansion or development

10.7 Policy P2 still completely fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it has been around for a long time and it needs to be permanently protected. It was actually established in a local act of parliament in Guildford under the London Home Counties (Green Belt) Act 1938 and subsequently in the 1944 Greater London Plan to contain the outward sprawl of London. The boundaries of the Green Belt through Guildford Borough were later defined in the 1987 Local Plan, forming part of a 19-24km concentric belt around London. The Green Belt is intended to check the unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and other urban land. The principles of the Green Belt designation were outlined within Planning Policy Guidance 2: Green Belts (PPG2) and are found within the National Planning Policy Framework (NPPF). The Metropolitan Green Belt is an exemplar of good planning and the envy of planners throughout the world.

10.8 Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital.

10.9 It is quite incorrect to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included.
More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold. No-one argues that we should sell 1.6% of the Crown jewels in order to build houses.

10.10 I object to the statement in the Draft Local Plan under Green Belt Policy P2 (4.3.13) which claims that Send and a further list of 13 villages are “now inset from the Green Belt”.

10.11 This statement is untrue as GBC is proposing to “inset” these village. No decision has been made by an Inspector, therefore the villages remain in the Green Belt!

10.12 I object to the changed “insetting” of 15 villages (including Ripley) from the Green Belt, and at “infilling” 12 of the borough’s Green Belt villages.

10.13 I am deeply disturbed that settlement boundaries are to be hugely extended in many villages (particularly at Send) and that infilling is also proposed outside the settlement boundaries of 11 further villages. This is completely unplanned and unmeasured development outside of the OAN.

10.14 Many Guildford villages are “leggy” in outline, reflecting the effect of ribbon development (often along just one side of existing roads) permitted between the Wars. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost hell bent on self-defeat.

10.15 Send is a good example of villages that should not be removed from the Green Belt. Send provides an important Green Belt buffer between Woking and Guildford. Yes, it is true that Send comprises old ribbon development but this should not mean it can be removed from the Green Belt so that Woking joins up to Guildford. The village and the countryside behind the A247 should all be protected.

10.16 I object to three particularly vulnerable areas of high quality amenity land being taken out of the Green Belt at Send which include:

10.17 The land behind the schools including playing fields and woodland.

10.18 The land to the right of Carbridge by the River Wey Navigation up to the new boundary fence with Vision Engineering.

10.19 Land to the left of Carbridge going up to the old depot on the Wey Navigation.

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

Attached documents:
The required housing allocation should be spread across the borough and not burdened in one part on Green Belt land which will put strain on infrastructure and change the character of these settlements.

Developers will want greenfield sites as building costs will be lower. 8086 houses are proposed for Green Belt compared to 1135 for the Guildford urban area which is inequitable, will destroy the Green Belt and disincentives Urban regeneration.

The policy makes all villages in the green belt vulnerable to large blocks of new development.

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

Attached documents:

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Comment ID: PSLPP16/8691  Respondent: 8858657 / Oliver Cass  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

Policy P2: Green Belt

Policy P2 states that: “We will continue to protect the Metropolitan Green Belt.” However, through the housing policies set out in the Document, GBC appears to be in breach of this policy through the housing policies. **Approx. 65% of the developments** proposed by GBC are to be built on land currently within the Metropolitan Green Belt and there appears to be little attempt to reduce housing delivery in order to take account of this.

**Paragraph 4.3.13: Proposal to inset East Horsley from the Green Belt**

Policy P2 proposes that East Horsley should be inset from the Green Belt. East Horsley is set in a rural location and the village has the look and feel of a rural village. Its Green Belt status has been a **key factor in preserving the rural character and openness of this village**, and this is a key factor in attracting people to relocate to the village, often from the built up areas of South West London. By train, it remains a commutable distance to London, and its rural setting is a key factor in attracting people looking to relocate. Development on the Green Belt would undoubtedly erode the attractiveness and appeal of East Horsley.

The Green Belt has existed for many decades, with good purpose and great success, and I do not believe there is evidence that this situation should be reversed at this time.

In addition, the proposed insetting of East and West Horsley includes taking some parcels of land which are currently in the Green Belt and now categorising them as part of the inset villages, ie, what is proposed to be outside the Green Belt includes more land than sits within the current village boundaries. This allows the Council to state that all development around the borders of East and West Horsley would not be within the Green Belt whereas the reality is that this would only be true because the Council is taking large parcels of greenfield land out of the Green Belt, not just taking the land within the already defined village boundaries out of the Green Belt.

I object to the proposal to inset East and West Horsley from the Green Belt and request that this proposal is removed from the Local Plan.

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

Attached documents:

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Comment ID: PSLPP16/13589  Respondent: 8858817 / Roger Chamberlain  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

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

Attached documents:

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<thead>
<tr>
<th>Comment ID: PSLPP16/10383</th>
<th>Respondent: 8858881 / Stephen Meredith</th>
<th>Agent:</th>
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I object to this policy on the grounds that this is not protecting the Green Belt (Policy P2). This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt. In addition other changes within the plan, such as the change to the village settlement area within West Clandon and other villages will result in other pieces of Green Belt land (such as land at Barn End, The Street, West Clandon) being developed for housing in addition to the sites allocated within the proposed plan.

Paragraph 4.3.16 is deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

I object extremely strongly to the “insetting” of 14 villages from the Green Belt. These villages contribute to the openness of the Green Belt and there is no need to inset them. To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and village settlement boundary extensions go ahead.

I object extremely strongly to the wholesale extension to the settlement boundaries in many villages which is a change made since the 2014 version of the Plan and in relation to which there has been no consultation. This change will allow infilling in the Green Belt. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development.

For example, Guildford Borough Planning Department are already well aware of multiple previous applications for planning permission for a large number of houses made by Philip Christian of Stonehaven homes on a 5 acre strip of
Green Belt at Barn End, The Street, West Clandon. Careful examination of the village settlement area of West Clandon shows that the existing West Clandon village settlement area had been very carefully drawn around the boundaries of this piece of Green Belt so as to protect this from development. The land is of environmental significance as this provides a green wildlife corridor adjacent to protected woodland. In the past every application has been refused locally and the decisions have been upheld on Appeal but that position will be impossible to sustain if this land is included in the proposed new settlement boundary for West Clandon I live next to this piece of land and surveyors have been seen working on the site in the last week presumably preparing an application for planning permission to develop the site wholesale if the draft Local Plan comes into force.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as it is factually incorrect.

In addition I object to the proposals to remove from the Green Belt Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the Green Belt they will be lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site. Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

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

Attached documents:

Comment ID: pslp171/1183  Respondent: 8858881 / Stephen Meredith  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Whilst 4.3.16 above states that the Green Belt boundaries are only moved in exceptional circumstances, there is no detail to explain those circumstances when the sites at Gosden Hill, Garlick’s Arch and Burnt Common are removed from the Green Belt in the plan.

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

Attached documents:

Comment ID: PSLPP16/15255  Respondent: 8858913 / Stephen Carter  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Protecting Policy P2 - Green Belt

This policy states that: ‘We will continue to protect the Metropolitan Green Belt’.

It would appear that GBC is in breach of its own policy in that 65% of the proposed housing developments set out in the Local Plan are to be built on land currently with the Metropolitan Green Belt.
This is an indefensible proposal when, under NPPF rules, GBC is permitted to make allowance for factors which may constrain the delivery of new housing, for example the need to protect the Metropolitan Green Belt and the Surrey Hills AONB. Both the Green Belt and the AONB make up a large proportion of the land area of Guildford Borough but GBC has made no attempt to reduce its housing numbers in order to take account of these constraints.

Metropolitan Green Belt rules make it clear that unfulfilled housing need is not normally regarded as 'exceptional circumstances' for building on the Green Belt. The Green Belt and Countryside Study commissioned by GBC justifies the need to make changes in settlement boundaries in order to meet unfulfilled housing need in the borough. NPPF states that every movement in settlement boundaries must be justified by 'exceptional circumstances'. No justification for the movement of settlement boundaries has been given for any or all of the boundary changes proposed in the Local Plan.

The Green Belt provisions apply in all parts of rural settlements covered by the Draft Local Plan. Notwithstanding this, the Plan proposes that 15 villages be removed from the Green Belt. These villages include East Horsley and West Horsley, the latter of which I am a resident. Many of Guildford's villages are based on a ribbon-type development, often on one side of the only main road in the village. To square off settlement boundaries at the edges and to allow infilling of greenfield sites on the supposition that the sites contribute nothing to the 'openness' and purpose of the Green Belt will invite continuing encroachment of urban sprawl, particularly for those villages closer to London. This is contrary to the NPPF paragraphs 79 and 80.

The Draft Local Plan proposes in excess of 5000 dwellings for the 8 mile strip between the M25/A3 interchange and the A3 Guildford Burpham slip road (2100 at the former Wisley Airfield, over 500 in East and West Horsley, 400 at Garlick's Arch, Send/Ripley, 2000 at Gosden Hill Farm plus other smaller developments). Aside from the assault on the Green Belt and all the associated efforts to protect biodiversity, agriculture, etc., this number of dwellings would put excessive pressure on the already fragile infrastructure and would, in the case of Gosden Hill Farm, be the first step of urban Guildford spreading into the West Clandon Parish settlement. This is precisely the type of development the Metropolitan Green Belt/NPPF rules seek to avoid.

I OBJECT to Policy P2

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

Attached documents:

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

1. The National Planning Policy Framework ("NPPF") does not justify the Green Belt

The five designated purposes of the Green Belt as set out in NPPF paragraph 80 are as follows:

- To check the unrestricted sprawl of large built up areas.
  - To prevent neighbouring towns merging into one
  - To assist in safeguarding the countryside from
  - To preserve the setting and special character of historic
  - To assist in urban regeneration, by encouraging the recycling of derelict and other urban

NPPF paragraph 79 states:

"The government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence."

These Green Belt provisions apply in all parts of rural settlements covered by the draft local Plan. Notwithstanding this, the draft local Plan proposes that 15 villages be removed from the Green Belt. These villages include East Horsley and West Horsley, the latter of which I am a resident.

It is, of course, obvious in the light of NPPF's emphasis on the permanence of the Green Belt, that it should only be eroded in exceptional circumstances. The NPPF itself confirms this in paragraphs 83-87. Paragraph 83 includes the following sentence:

"Once established Green Belt boundaries should only be altered in exceptional circumstances ...

... authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the Plan period".

Paragraph 87 provides:

"As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances".

It is therefore established and clear beyond peradventure that to justify the removal of, for example, East Horsley and West Horsley from the Green Belt requires exceptional circumstances. Ministerial guidance published by Brandon Lewis MP and Nick Boles MP on 1st January 2014 and 18th June 2014, clarifies that unmet housing need is not an "exceptional circumstance". This was further confirmed during the Queen's speech debate on 5th June 2014, when Sir Paul Beresford is reported by Hansard as having observed (with specific references to the "local Plan that my two local authorities are working on" - i.e. the Plan the subject of this letter):

"The current Planning Minister, my Hon Friend the Member for Grantham and Stamford [Nick Boles], and his immediate predecessor have emphasised that these sites could be removed from the Green Belt only in exceptional circumstances and that doing so in order to make up the housing site numbers was not exceptional. Unfortunately some councils- I will not name them-are not heeding that advice, and apparently neither are some Planning inspectors. Assuming that my Right Hon Friend agrees with the Minister, would he be able to circulate this important message to local authorities as they develop their Plans?"

Mr Pickles, the Secretary of State for Communities and Local Government, responded:

"Yes, indeed. We did that, I think as recently as a couple of months ago ..."

On 18th June 2014, Nick Boles, Parliamentary Undersecretary of State (Planning) formally confirmed in a letter to Sir Paul Beresford MP:

"Planning guidance, updated in March 2014, also states that unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt to constitute the very special circumstances justifying inappropriate development within the Green Belt".

He also observed that the core Planning principles that underpin Plan making include both protecting Green Belts and recognising the intrinsic character and beauty of the countryside.

It is therefore plain that unmet housing need is, in itself, not an exceptional circumstance. Indeed, to the contrary, the existence of the Green Belt/AONB is a reason not to meet an objectively assessed housing need. Accordingly, there can be no justification for the local Plan's proposal to build some 9,000 new houses on Green Belt land, even if there were a genuine objectively assessed housing need. However, no such need has, in any event, been demonstrated - indeed the contrary is the case.

It is also noteworthy that the draft Plan has been prepared following an electoral campaign run by the Conservative Party which, as one of its leading and most prominent pledges, promised protection of the Green Belt. This against the background of the previous draft's assault on the Green Belt which had attracted over 20,000 objections. Remarkably, the current draft Plan does not differ significantly from its predecessor that had been rejected. This represents an abandonment of the election pledge and is a course for which the Council has no mandate.

Hence, this Plan has no mandate from central government, from the NPPF or from the electorate. It should be rejected.
The open space within villages in the Green Belt is part of the intrinsic nature and, indeed, character of these villages.  

_to identify these green spaces as 'gaps' is potentially misleading._

In many instances, an incongruity would arise from development that did not reflect an existing character of a village within the Green Belt and these spaces should generally be protected to ensure that any proposed new development would only arise in exceptional circumstances, rather than a less rigorous test of Development Plan compliance.

1. The Local Plan proposes major, unjustified and unacceptable erosion of, and removal of villages or major parts thereof from, the Green Belt.
2. Over 70% of new housing is proposed to be built within the existing Green Belt notwithstanding that there is more than enough genuinely brownfield land and non-Green Belt land available.

I **OBJECT** to the proposal to inset Send Business Park from the Green Belt because:

- It is effectively an old non-confirming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation.
- There is highly restricted vehicular access along Tannery Lane in both directions.
- Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate.
I OBJECT to all erosion of the Green Belt, building on the Green Belt should NOT be approved to all Brown sites are used.

I OBJECT to all “in-setting” of any villages from the Green Belt, villages are an important part of the fabric of our Country and should not be removed.

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

I OBJECT to this policy. This policy is much weaker than previous protection. It is dependent on the Surrey Hills Management Plan. Note that this welcomes housing development. The Surrey Hills needs much more substantial protection. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated.

This policy is tepid in support of the Metropolitan Green Belt even though it constitutes 89% of the borough and should be the cornerstone of all local planning policy. It is precious beyond the short-term demands of the present Government’s policy or a 15-year local plan. As noted under Policy S1 above, it is a solemn legacy to future generations – an asset and amenity that belongs as much to Londoners and the wider nation as to the people who live in it. It is not the Council’s to give away, and once it is gone it is gone forever.

Any policy on the Green Belt should start with a fair assessment of its value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. Building on it involves high opportunity costs, including an irreversible loss of:

- Agricultural production
- Rural leisure and tourism amenities
- Water catchment
- Flood control
- Biodiversity
- Natural heritage
- A carbon sink for air pollution
- Room for public facilities such as parks and burial grounds
- Profitable film locations (e.g. Shere)
- Future economic potential such as mineral extraction (even fracking)
- Natural beauty, landmarks, open space, rural views and sight lines
- Benefits to public health and wellbeing, physical and psychological (as well expressed in the NPPF)
As a matter of law, morality and national and local policy, these assets should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation.

It is disreputable to argue, as the Council does, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. No-one argues that we should sell 1.6% of British Museum artefacts in order to build houses.

I am not opposed to appropriate development in the Green Belt, but I fail to see why a system of fair burden-sharing of new development cannot be applied to the borough’s existing settlements in proportion to their size. This would minimise the strain on infrastructure and maximise the chances of retaining the character of each settlement through gradual growth. It is reasonable to ask urban Guildford, with x times the population of semi-rural East Horsley for instance, to accommodate x times the number of new homes over the plan period. Parish councils could be asked, and would no doubt be willing, to propose where their quota of houses should go. Most rural residents are reasonable people who, if not alienated by top-down planners, will support realistic numbers of new houses in their neighbourhoods.

Unfortunately, this democratic, bottom-up approach has not been attempted.

Instead, while developers flip and land-bank urban sites as a financial speculation, this plan will dump most new development on greenfield sites where building costs are lower, covering the Green Belt with dozens of housing estates few residents want. 8,086 new houses are planned for the Green Belt but only 1,135 for Guildford urban area. This is disruptive, socially inequitable and unnecessary. It will not only destroy countryside but will also delay and disincentivise much-needed urban regeneration. The remarkable revival and repopulation of central London shows that building dormitory satellite settlements is an out-of-date approach to planning.

I particularly protest at the “insetting” of 14 villages from the Green Belt, and at “infilling” 12 Green Belt villages. I am deeply disturbed that settlement boundaries are to be hugely extended in many villages and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are “leggy” in outline, reflecting the effect of ribbon development (often along just one side of existing roads) permitted between the Wars. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost hellbent on securing the rejection of the plan as a whole.

I believe this policy is based on a flawed Green Belt and Countryside Study that, according to one Conservative Councillor, was irregularly commissioned by Council officers without the authority of Councillors. To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, although they would quickly defeat them if the proposed “insetting” and boundary extensions go ahead. This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

The policy states that “the general extent of the Green Belt has been retained.” This is a misrepresentation.

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

**Attached documents:**

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<th>Respondent:</th>
<th>8860897 / Julia Shaw</th>
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1. I object to the changes to Policy P2 because they have not addressed many of the 32,000 objections made to the 2016 plan.
2. I object to the new para (1) “The Metropolitan Green Belt will continue to be protected as shown designated on
the Policies Map, against inappropriate development. In accordance with national planning policy, the
construction of new development will be considered inappropriate and will not be permitted unless very special
circumstances can be demonstrated.” The words “as shown designated on the Policies Map” should be deleted.
The Policies Map has effectively ignored huge areas of Green Belt protection and the new para (1) is therefore a
sham.

3. I object to the proposed change that Send Business Park should be inset from the Green Belt due to the fact that:
4. It is effectively a non-conforming user in an area of beautiful countryside adjacent to the beautiful Wey
Navigation
5. It has restricted access along Tannery Lane
6. It should not be given the opportunity for further expansion or development
7. Policy P2 still completely fails to appreciate the importance and permanence of the Metropolitan Green Belt and
the fact that it has been around for a long time and it needs to be permanently protected. It was actually
established in a local act of parliament in Guildford under the London Home Counties (Green Belt) Act 1938
and subsequently in the 1944 Greater London Plan to contain the outward sprawl of London. The boundaries of
the Green Belt through Guildford Borough were later defined in the 1987 Local Plan, forming part of a 19-24km
concentric belt around London. The Green Belt is intended to check the unrestricted sprawl of built up areas; to
prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to
preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging
the recycling of derelict and other urban land. The principles of the Green Belt designation were outlined within
Planning Policy Guidance 2: Green Belts (PPG2) and are found within the National Planning Policy Framework
(NPPF). The Metropolitan Green Belt is an exemplar of good planning and the envy of planners throughout the
world.

8. Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an
inhabited, working environment that safeguards a certain stock of natural capital.
9. It is quite incorrect to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the
borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary
extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else)
of Green Belt that may be sold. No-one argues that we should sell 1.6% of the Crown jewels in order to build
houses.

10. I object to the statement in the Draft Local Plan under Green Belt Policy P2 (4.3.13) which claims that Send and
a further list of 13 villages are “now inset from the Green Belt”.
11. This statement is untrue as GBC is proposing to “inset” these village. No decision has been made by an
Inspector, therefore the villages remain in the Green Belt!
12. I object to the changed “insetting” of 15 villages (including Ripley) from the Green Belt, and at “infilling” 12
of the borough’s Green Belt villages.
13. I am deeply disturbed that settlement boundaries are to be hugely extended in many villages (particularly at
Send) and that infilling is also proposed outside the settlement boundaries of 11 further villages. This is
completely unplanned and unmeasured development outside of the OAN.
14. Many Guildford villages are “leggy” in outline, reflecting the effect of ribbon development (often along just one
side of existing roads) permitted between the Wars. It is all too easy to square off boundaries by including
countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the
“openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of
Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all
villages within the Green Belt vulnerable to large blocks of new development and seems almost hell bent on
self-defeat.

15. Send is a good example of villages that should not be removed from the Green Belt. Send provides an important
Green Belt buffer between Woking and Guildford. Yes, it is true that Send comprises old ribbon development
but this should not mean it can be removed from the Green Belt so that Woking joins up to Guildford. The
village and the countryside behind the A247 should all be protected.
16. I object to three particularly vulnerable areas of high quality amenity land being taken out of the Green Belt at
Send which include:
17. The land behind the schools including playing fields and woodland.
   • The land to the right of Cartbridge by the River Wey Navigation up to the new boundary fence with Vision
     Engineering.
   • Land to the left of Cartbridge going up to the old depot on the Wey Navigation.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8632  Respondent: 8860993 / G J Woolf  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

What is the green belt?
Why was it formed?
Could it possibly have been to avoid the very situation which has now arisen? One cannot detract there from a little bit here, a little bit there, with the excuse, you’re no longer in the green belt
We’re in the green belt

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

Attached documents:

Comment ID: PSLPP16/99  Respondent: 8861121 / T.E Hart  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

GUILDFORD BOROUGH DRAFT LOCAL PLAN
I object to the proposed local plan on the following grounds:

Green Belt – Reduction of Green Belt in the Borough Local Plan would be extremely detrimental to the villages. Any loss to this important land, would create a dangerous precedence.

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

Attached documents:

Comment ID: PSLPP16/9760  Respondent: 8861313 / Sylvia Howard  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

In conclusion I urge that the character of the Horsleys and above all the Green Belt should be protected as they currently stand. We owe it to future generations to preserve them. We will not know what we have lost - one could say 'squandered' until they have gone.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to the boundaries for both East and West Horsley being extended, thus encroaching on the Green Belt. This, despite GBC's statement that it will 'continue to protect the green belt'.

In conclusion I do not believe that there are any 'exceptional circumstances' which could justify these plans. The green belt was established just to prevent this type of development and it should still be protected.

I object to the proposal to move the green belt to exclude the fields behind Shalford village hall and extend the village settlement boundary to include these fields.

I urge you to retain them within the green belt boundary and keep them outside the village settlement boundary.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I OBJECT to all insetting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley

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

**Attached documents:**

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<th>8862625 / Raza Shah</th>
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Policy P2 Green Plan

In reference to the revised Policy P2 Green Belt

I make the following objections:

- **I object** to the changes to Policy P2 because they have not addressed many of the 32,000 comments made to the previous 2016 plan.
- **I object** to the new para (1) “The Metropolitan Green Belt will continue to be protected as shown designated on the Policies Map, against inappropriate development. In accordance with national planning policy, the construction of new development will be considered inappropriate and will not be permitted unless very special circumstances can be demonstrated.” The words “as shown designated on the Policies Map” should be deleted. The Policies Map has effectively ignored huge areas of Green Belt protection and the new para (1) is therefore a sham.
- **I object** to the proposed change that Normandy settlement, Flexford settlement and Walden Cottages should be inset from the Green Belt due to the fact that:
  - There is evidence in past planning appeals APP/Y3615/W/15/3002308, APP/Y3615/A/10/ 2140630 and APP/Y3615/A/10/ 2131590 that the land here contributes to the “openness” of the Green Belt
  - There is evidence in the Sustainability Appraisal para 10.4.7 that the agricultural land between the settlements is of BMV quality, exhibits ‘openness’ and contributes to the rural economy
  - The land in and around the settlements of Normandy and Flexford contributes to views into and from the Surrey Hills AONB (Hog’s Back)
- **Policy P2 fails** to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it needs to be permanently protected. The Green Belt is intended to check the unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and other urban land.
- **Policy P2 omits** any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital.
- It is **incorrect** to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of land that may be removed from the Green Belt.
- **I object** to the statement in the submission Local Plan under Green Belt Policy P2 (4.3.13) which claims that Normandy, Flexford and a further list of 12 villages are “now inset from the Green Belt”. This statement is untrue as GBC is proposing to “inset” these villages. No decision has been made by an Inspector, therefore the villages remain in the Green Belt.
- **I object** to the changed “insetting” of 15 villages from the Green Belt, and at “infilling” 12 of the borough’s Green Belt villages.
• I am concerned that settlement boundaries are to be hugely extended in many villages and that infilling is also proposed outside the settlement boundaries of 11 further villages. This is completely unplanned and unmeasured development outside the OAN.

• Many Guildford villages are elongated in outline, reflecting the effect of ribbon development (often along just one side of existing roads) permitted between the Wars. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development.

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

Attached documents:
Please find my comments on aspects of the Guildford Borough Proposed Submission Local Plan: strategy and sites June 2016:

**Proposed Submission Local Plan: strategy and sites 2016 - Part 1: Policies**

**Policy P2: Green Belt**

Ref 4.3.13

I strongly object to the insetting of the three villages of Ripley, Send and Send Marsh/ Burnt Common, the net result of which will lead inevitably to the creation of one single urban area in which all three will loose their distinct characteristics. The reasons (i.e. why it was deemed to be appropriate) for insetting these villages were never discussed with local residents.

Ref 4.3.16

I strongly object to the amendment of the Green Belt boundaries in the vicinity of Ripley, Send and Send Marsh/ Burnt Common. The case for only amending the Green Belt boundaries in exceptional circumstances has not been made or discussed and shared through adequate consultation with the residents of the three villages.

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

**Attached documents:**

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<th>Comment ID: PSLPP16/540</th>
<th>Respondent: 8865281 / R G Dedman</th>
<th>Agent:</th>
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<td>I object to building on the Green Belt except under exceptional circumstances</td>
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<td>This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.</td>
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<td>The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public</td>
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consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt. Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brownfield sites.

I note that the Summer 2016 edition of “About Guildford” (published by the Council) on page 5 states that ”... the Plan rejects any schemes that would have a detrimental impact on the Green Belt.” This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I object to the proposals to remove from the Green Belt the so-called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to
be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a 'special circumstance') to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

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

**Attached documents:**

**Comment ID:** pslp171/2765  **Respondent:** 8865665 / David Williams  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

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

4. Policy 2 – Green Belt inset for Send Business Park

This site is adjacent to the Wey Navigation canal. The Wey Valley is and must remain a heritage Green Belt Area. It is already under major threat from developers in 2 locations within 1 mile east of this site. Green Belt rules must be maintained for all industrial and commercial sites in the Wey corridor.

Send Business Park has major access issues in Tannery Lane. Road and infrastructure facilities must be upgraded before any new developments are considered.

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

**Attached documents:**

**Comment ID:** pslp171/1683  **Respondent:** 8865697 / Robert Treble  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

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

I strongly object to:

- proposals for new Green Belt boundaries within the Metropolitan Green Belt and "insetting" of several villages from the Green Belt, including the villages of West Horsley and East Horsley. This will give rise to further infilling development potential within the arbitrarily extended villages settlement areas.
- the change in the East Horsley settlement boundary to the south of the A246 [Map entitled Amendment 2: Horsleys-East Horsley (south)].
- the use of an unconstrained OAN figure of 654 homes per annum throughout the rural and urban areas.
• the unsustainable characteristics of proposed development sites A37, A38, A39 and A40. The Proposed Submission Local Plan 2017 consultation documents contain no proposals for provision of infrastructure for the proposed development sites in East and West Horsley.

One of the changes in Policy P2 refers to the Metropolitan Green Belt as "designated on the policies map" where it previously stated "as shown on the proposals map". This change appears to have ignored all previous comments on the proposals to inset villages and translated the insetting proposals into a current status. The previous objections to the fact that the Green Belt including the Surrey villages, and in particular the villages of East and West Horsley, continued to meet the requirements set out for Green Belt designation still stand. The insetting of villages, together with the extension of settlement boundaries, for the purpose of achieving (erroneous) housing targets is inconsistent with national government and GBC declared intent of protecting the Metropolitan Green Belt and does not represent exceptional circumstances.

The proposal to include land to the south of the A246 within the settlement boundary for East Horsley, which increases the settlement area by almost 40%, would not only adversely change the form and character of East Horsley, but runs counter to the proposed Policy D3 to conserve historic environment. The area to the south of the A246 is an example of the equilibrium between the built environment and the natural environment providing an historic asset based around an ancient hollow way through the chalk hills. This is rightly, and historically, outside defined settlement areas.

For West Horsley South, categorised as highly sensitive by the Green Belt Purposes Schedule, the additional lands proposed for removal from the Green Belt will be highly damaging to listed buildings, historic buildings, the conservation area and the overall character of the village.

Development sites A37(WH South) and A40 (WH North) were assessed as unsustainable. No justification was presented for the new boundaries, many of which are not defensible.

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

Attached documents:
1. I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

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

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In spite of many thousands of public objections raised against previous versions of the plan regarding building on the Green Belt in such high numbers when the local infrastructure cannot cope, no effort has been made to address these concerns in this the latest version. In fact the number of houses and travellers pitches has increased together with a potentially large increase of industrial space. We need to keep the Green Belt sacrosanct as stated in government policy.

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

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3. IOBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick's Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a 'special circumstance' and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC's Green Belt & Countryside Report does not address Garlick's Arch, so there is no evidence base to support including this site.

Rather than developing Garlick's Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

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

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I object to the draft Local Plan for the following key reasons 1. I am concerned that 70% of the new housing proposed is to be built within the Green Belt when there is brown field land that needs regenerating ....and I object to this encroachment.

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

Attached documents:
Policy P2 Green Belt

I OBJECT to the insetting of 14 villages and the proposed infilling within a further 11 villages. The Green Belt was created to protect London, not just Guildford and once it is lost it will be gone forever.

There are pious policies to protect the heritage and develop tourism but they count for nothing if the Green Belt setting of the Town and the heritage sites is destroyed, the roads clogged, and large areas put at greater risk of flooding.

Rural exception homes are proposed to be built anywhere near a settlement. This is a further insidious attack on the Green Belt. At the very least the policy should be limited to genuinely exceptional circumstances where LOCAL NEED cannot otherwise be met.

Developing homes, shops and businesses in the Green Belt will put intolerable strains on infrastructure that is already overstretched. In particular it will increase traffic movements and car parking requirements; the idea that thousands of people will walk or cycle five miles or more to get to school or work is ludicrous; some able bodied people might do so in fine weather but a large number of journeys have to be made by children or by the elderly or the infirm. Even those who are fit to walk or cycle significant distances are unlikely to do so in bad weather in the winter. Developing 8,086 homes in the Green Belt will not only be an unnecessary environmental disaster but create social and logistical problems. The number of planned homes should be reduced and more of them should be planned for Guildford Town Centre.

The NPPF paragraph 17 requires local plans to allow local people to shape the plans. The consultations that have been carried out clearly show that the citizens of Guildford overwhelmingly support preservation of the Green Belt and the draft Plan shows complete disregard for this.

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

Attached documents:

The Environment:

• The village of West Horsley, including all the major Development Sites, is currently ‘washed’ over by the Green Belt. I strongly object to the policy in the current document which seeks to remove East Horsley and West Horsley villages from the Green Belt, by altering the Green Belt boundaries by the procedure known as insetting.

• The Green Belt within Guildford Borough is a Regional and National asset and should be protected in so far as is absolutely pos Removal of land from the Green Belt should only be allowed in “exceptional circumstances” after detailed consideration of the individual sites concerned. Otherwise removal will forever change the nature of these villages and the character will be lost, an approach that our generation will live to regret. The proposed Guildford Local Plan does NOT demonstrate that these “exceptional circumstances” exist, which renders the action unsound. I therefore OBJECT to the Guildford Local Plan where it proposes East and West Horsley being inset from the Green Belt and ask that the villages remain washed over by the Green Belt.

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

Comment ID: PSLPP16/15884  Respondent: 8878337 / J.R Lukey  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am definitely against any proposal to large sale developments on Green Belt Land. This area is a wonderful mixture of town and country - which is why we chose to live here in the first place.

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

Attached documents:

Comment ID: PSLPP16/15888  Respondent: 8878337 / J.R Lukey  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We the people of Guildford elected you the Council to protect out interests and safeguard the lovely area of common land/green belt that surrounds Guildford.

It's time to let us know that that is what you are doing.

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

Attached documents:

Comment ID: PSLPP16/399  Respondent: 8879841 / Jonathan and Theresa Hulford-Funnel  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing to comment on Guildford Borough Council's new draft Local Plan, which is now open for consultation until 18th July 2016, and to strongly object on several areas.

I object to the plans due to the loss of Green Belt land.

The green belt was put in place for a reason – to stop urban sprawl and protect our countryside. If we continue to build on our countryside it won’t be long before we have none left. Is this a legacy we want to leave for our children?

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

Attached documents:

Comment ID: PSLPP16/17888  Respondent: 8879969 / Robert & Tracey Butcher  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Objection to The Guildford Borough Proposed Submission Local Plan – Strategy and Sites Consultation June 2016

I object to the proposed insetting of the green belt to satisfy the arbitrary need for the construction of residential properties. The proposals prejudice the green belt in the areas proposed and would compromise the locality of the openness experienced by those existing residents living next to the proposed developments.

The NPPF paragraph 88 states:

Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.

Guildford Borough Council proposals do not present exceptional circumstances and it is not easily apparent that the Council has considered in enough detail the re-use of existing already developed and previously developed sites within the borough. A hitherto unmet need for housing does not qualify as exceptional circumstances in order to satisfy the need to achieve permission to change the green belt boundary.

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

Attached documents:

Comment ID: PSLPP16/9428  Respondent: 8880225 / Jennifer Rankin  Agent:

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

Firstly, the whole idea behind the introduction of a Green Belt was to prevent exactly what is being proposed now. The Green Belt protects land and, in so doing, protects people, the quality of their lives and their communities. There are people who are content or even prefer to live in crowded cities but this does not mean that all people should be made to do the same, the people who live in the Horsleys and in other Surrey villages made a choice to live in a semi-rural atmosphere not a city or developed suburb and it is wrong for the Government and Local Authorities to attempt to remove Green Belt status in this random fashion.

I particular, I am opposed to the removal of any part of the Green Belt protection that exists in the Horsleys and the former Wisley Airfield. The environment that the Horsleys enjoy exists simply because of the Green Belt protection.

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

Attached documents:

Comment ID: PSLPP16/15688  Respondent: 8880225 / Jennifer Rankin  Agent:

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

I wish to object to the proposed New Local Plan regarding the snatching of our very precious Green Belt especially in the villages of Wisley, Effingham and East and West Horsley.
After the war, the Green Belt was set up to safeguard areas of countryside to protect small towns and villages against the urban sprawl of London and individual villages being merging into one another. These areas of green allowed people who chose to live outside London to enjoy the freedom to walk, breathe fresh air and enjoy the wildlife that these areas offered.

There are many brown field sites that could be used for housing, commercial businesses and other uses without touching our precious green belt. It is proposed to build homes and to provide cheap houses for young people and key workers but in all honesty, they would not be able to afford to live in the Surrey villages or have work to pay for living in these areas. Also our infrastructure, schools, doctors, roads, local shop parking would not support any large development in our villages.

As we chose to live in the beautiful Surrey countryside and paid a huge premium to do so, we wish our precious green areas to be left intact.

In writing, we particularly wish the field called The Menage at the joining of Norrels Drive and High Park Avenue to be reinstated back into the Green Belt immediately. This should never have been withdrawn in the first place.

Unmet housing is not a justification for changing the Green Belt boundaries and no evidence of exceptional circumstances has been offered by the Guildford Borough Council to alter the existence of the Green Belt.

We urge the Guildford Borough Council to please uphold our views and concerns with regard to our very precious Green Belt areas and stop the urban sprawl that we are currently threatened with.

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

**Attached documents:**

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**Comment ID:** PSLPP16/14981  **Respondent:** 8880321 / Elizabeth Baker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

Even though the council’s own SHMA admits (summary para 1.7) that the government attaches great importance to the Green Belt, the strategy continues to go against government policy on maintaining the Green Belt and 65% of the new houses proposed are to be built on Green Belt land.

The far-sighted concept of the Green Belt was established to confine development to designated areas and this concept is increasingly important in the south east of England, especially for villages such as East and West Horsley which are close to, but separated from, major routes such as the A3 and M25.

According to government the green belt serves five purposes:
- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.” It also made clear that the construction of new buildings should be regarded as “inappropriate” for the green belt. Although some exceptions were set out none cover the nature or extent of the proposals made by GBC in its Local Plan.

Note that the government position explains that one of the characteristics of the green belt is its ‘permanence’ and it is precisely under circumstances in which there is temptation or pressure to provide more homes that the concept of the green belt is crucial. If it is not strictly respected, in time to come it will be whittled away until it is not worth protecting. You only need look in the direction of Leatherhead to see how contiguous development out towards Epsom and
Carshalton has resulted in urban sprawl and the effect that the Green Belt was intended to prevent. Once built on, the land has gone forever, and with it, the character and benefits that it provides. Proposals to move other areas of land into the Green Belt or otherwise protect countryside to compensate for any that is removed is a cosmetic veneer which undermines its purpose and leaves this classification open to abuse. Therefore I object vehemently to the insetting of 14 villages from the Green Belt.

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

Attached documents:

Comment ID: PSLPP16/15582 Respondent: 8880321 / Elizabeth Baker Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

I object.

We must continue to protect the Green Belt because it is precious and was established to confine development to designated areas. It is important to me that we do all in our power to preserve the countryside and wildlife and prevent encroachment of urban sprawl. It is also vitally important to preserve air quality and this is particularly important for the villages of East and West Horsley in view of their proximity to the A3 and M25.

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

Attached documents:

Comment ID: pslp171/2275 Respondent: 8880321 / Elizabeth Baker Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

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

My objections are as follows:

1. Green Belt

It is still proposed to inset (remove) East and West Horsley from the Green Belt. I object strongly to this. It is unacceptable and is contrary to the stated policy of the government. Respect for the Green Belt is increasingly important in the south east of England, especially for the villages of East and West Horsley which are close to major routes such as the A3 and M25.

In its 2012 Planning Policy guidance the government said “The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.” It also made clear that the construction of new buildings should be regarded as “inappropriate” for the green belt.

Note that the government position explains that one of the characteristics of the green belt is its ‘permanence’ and it is precisely in times of pressure to provide more homes that the concept of the green belt is crucial.

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

Attached documents:

Comment ID: PSLPP16/3995 Respondent: 8880353 / Judith Allen Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated without the need to encroach on protected Green Belt land. Election manifesto promises are being ignored.

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

Attached documents:

Comment ID: PSLPP16/5743  Respondent: 8880385 / John Telfer  Agent:  

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

I object totally to the proposed Local Plan 11 2016 and resurrected remnants of the earlier Local Plan I for the following reasons.

I object to the withdrawal of any further areas of Send, Ripley, Clandon or Ockham from the pennant provisions and pricipes of the Metropolitan Green Belt legislation. Local Councillors and MPs gave clear promises to the Green Belt and Local Plans clearly renge on these promises. There are several brown-field sites available and these should be developed as a priority.

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

Attached documents:

Comment ID: pslp171/699  Respondent: 8880385 / John Telfer  Agent:  

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

I object to the Green Belt Policy 2 at paragraph 4.3.15 that the Business Park be taken out from the Green Belt provisions. Picking out bits and pieces will eventually destroy it for the future amenity because each exclusion will become precedents, and the Council and Residents will be unable to resist unwanted development because the Developer has the right of appeal but not the Residents who have to live forever with those decisions.

Conditions placed upon Developers in given planning approval are legally and contractually unenforceable. Time was the local authority dictated planning densities, standards of quality construction, competitive bids abstained and a legally enforceable contract existed. Leaving these matters to the goodwill of developers is unsustainable.

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

Attached documents:

Comment ID: PSLPP16/14932  Respondent: 8880865 / Jane Paton  Agent:  

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

No exceptional circumstances have been set out to justify removing land from the Green Belt. Exceptional circumstances are required by the NPPF.

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

Attached documents:

Comment ID: PSLPP16/3594  Respondent: 8880929 / Maurice Dawes  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the elimination of Send from the Green Belt because Send provides a useful buffer between Woking and Guildford.

I object to the assumption of what is an exaggerated "housing need" figure of 13,860 which I believe to be far too high and will result in unnecessary development of the Green Belt.

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

Attached documents:

Comment ID: PSLPP16/7154  Respondent: 8881345 / Lynne Ground  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

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

Attached documents:

Comment ID: PSLPP16/11571  Respondent: 8881537 / Jean Baptist  Agent:
I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.
This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of "empowering local people to shape their surroundings" and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

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

Attached documents:

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Comment ID: PSLPP16/10713  Respondent: 8881633 / Gwyn Keepence  Agent:

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

I wish to object to the New Local 2016 particularly as it affects East and West Horsley.

It is proposed to remove East and West Horsley from the Green Belt. Such a measure is only permitted in "exceptional circumstances" but nowhere in the plan have such "exceptional circumstances" been demonstrated.

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

Attached documents:

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Comment ID: PSLPP16/2705  Respondent: 8881665 / Mike Forster  Agent:

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

• Allowing Green Belt development to pay for transport schemes will simply generate yet more traffic from more homes, fuelling congestion.

• We oppose unjustified Green Belt development.

• It is irresponsible to squander every last resort greenfield site in a single Plan, robbing future generations.
Brownfield opportunities are being ignored – we need homes in the centre (not 40% more shops), much more accommodation on campus for students, and homes for the elderly to free up family houses.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/3549</th>
<th>Respondent: 8881825 / Siobhan Collins</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<tr>
<td>I object to not protecting the Green Belt</td>
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<tr>
<td>Our Green Belt was put in place to protect the countryside and provide space and enjoyment for all. To infringe on the Green Belt between the borough’s existing settlements will lead to a merging of towns and villages, removing open space and robbing future generations of our beautiful rural areas.</td>
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<td>I understand over 70% of the proposed development is on Green Belt and I STRONGLY object to this. I feel completely let down by the local council even putting forward a proposal of this nature and can only feel suspicious of their true motives.</td>
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<td>The presence of Green Belt should be considered a major constraint in any planning proposals and the need for more houses should NOT be considered an ‘exceptional circumstance’ to allow development on the Green Belt</td>
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<th>Comment ID: PSLPP16/3552</th>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>I object to Brownfield sites not being re-developed for housing</td>
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<td>Existing Brownfield sites and unoccupied properties must be developed for housing rather than reducing the size of our Green Belt.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<tr>
<th>Comment ID: PSLPP16/6798</th>
<th>Respondent: 8882305 / Jill Ryan</th>
<th>Agent:</th>
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I write to formally object in the strongest terms to the proposal in the local plan to build 500+ houses on green belt land in West Horsley village.

I object for the following reasons:-

- West Horsley is in the green belt and should not be developed. It goes against the statement in the Green Belt and Countryside policy which says ‘we will continue to protect the Metropolitan Green Belt against inappropriate development’ - it is clearly inappropriate to volume build large housing estates in a rural environment.

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

Attached documents:

Comment ID: PSLPP16/6799  Respondent: 8882305 / J Jill Ryan  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

It would appear that the only people who would welcome these proposals will be the developers who will see the opportunity to make a 'quick buck' by building on easy green field sites with no thought beyond for the community or the environment - please do not let this happen in this area.

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

Attached documents:

Comment ID: PSLPP16/7295  Respondent: 8882881 / Andy and Sandy Homewood  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

GREEN BELT

The proposal to remove these two villages from the Green Belt is devious, ill-thought out and has not recognised the requirements necessary to reflect this within the village’s infrastructure. Our Green Belt is not only precious to us locally, it is also a key element to any responsible environmental strategy we take on a wider scale. It is what protects London from urban sprawl. It preserves air quality; it prevents flooding; it is our city’s and other urban areas’ playground. It is for us to conserve and protect it. Green Belt development should not in any circumstances be considered until all Brown belt options have been utilised and exhausted. It is clearly evident in the Guildford Borough area that this has not been the case.

There are 5 legal purposes for Green Belt, and it meets them all:

- To check the unrestricted sprawl of large built up areas
- To prevent neighbouring towns merging into one another
- To assist in safeguarding the countryside from encroachment
- To preserve the setting and special character of historic towns
- To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

NO EXCEPTIONAL CIRCUMSTANCES
This revised local plan covering Guildford Borough Council, still proposes over 8,000 new homes to be built on Green Belt land, which is over 60% of all planned development.

The National Planning Policy Framework (NPPF) requires any change of Green Belt boundaries to demonstrate exceptional circumstances. Unmet housing need is NOT an exceptional circumstance in law. In addition the existence of the Green Belt/AONB is a reason for NOT meeting objectively assessed housing need (i.e. such protected land is a legal constraint against any such development) No exceptional circumstances have been disclosed. So the Green Belt boundaries should NOT be changed. To remove the two Villages from the Green Belt would change the nature of this area of countryside forever and would eventually merge historic and separate villages. It would be an environmental mistake that could never be reversed.

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

**Attached documents:**

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**Comment ID:** PSLPP16/6555  **Respondent:** 8883105 / P J Warner  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

I strongly object to the change in status of the Green Belt.

The Green Belt is there to protect the rural land surrounding the villages and on a larger scale a ring of green land circling London. The proposed changes are a blatant ploy to allow more urbanisation in a rural landscape. A thoroughly retrograde manoeuvre. What "exceptional circumstances" justify this?

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

**Attached documents:**

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**Comment ID:** PSLPP16/3327  **Respondent:** 8883489 / N & B Hinchliff  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

I am writing to register my objections to the new Guildford Local Plan. These refer mainly to the Horsleys but also to the surrounding area which will impact so adversely on our villages.

Whilst I can fully understand the need for ‘some’ new housing, the number proposed, the inadequate infrastructure to support the increase in population that would result and the location of the same are all quite unacceptable.

I object to all of the following:

1. **The proposal to remove the Horsleys from the Green Belt (Policy P2)**

   My understanding is that there have to be exceptional circumstances for this to be considered and this has not been demonstrated.
Our Green Belt is precious. It is what protects London from urban sprawl; it preserves air quality; it prevents flooding; it is the city’s playground. It is for us to conserve and protect it. There are 5 legal purposes for Green Belt, and it meets them all:

- To check the unrestricted sprawl of large built up areas
- To prevent neighbouring towns merging into one another
- To assist in safeguarding the countryside from encroachment
- To preserve the setting and special character of historic towns
- To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

This policy is flawed and should have been amended. In the last consultation just six individuals, out of the c. 7,000 of those who took part in the consultation, supported the policy. Another 20 comments of support were from organisations such as: the University of Surrey, local councils (including Guildford), consultants (e.g. Savills) or landowners. But of the 1,371 who commented on the green belt policy 1,332 (97%) were against.

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

Attached documents:
circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a 'special circumstance' and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

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

Attached documents:

Comment ID: PSLPP16/13060  Respondent: 8884929 / Susan Bamber  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Creating the Green Belt was an act of wonderful foresight for future generations to come. The Green Belt benefits everyone in London and the South East, not just the people who live in it.
One example is the hundreds of cyclists who visit the area every weekend to enjoy the green space.
Reducing the Green Belt around East and West Horsley and Effingham would set a precedent, making it easier for the Green Belt to be reduced elsewhere. The whole point of the Green Belt is that it is sacrosanct. If we gradually remove some villages here, then more villages somewhere else, it will disappear. Once these green spaces are lost, they will never be regained.
The Green Belt aims to contain the outward spread of London and retain the open nature of the countryside. Reducing the Green Belt to build the currently proposed homes will open the way for more and more homes in the future. The villages will simply merge into one large built up town.
The National Planning Policy Framework requires any change of Green Belt boundaries to demonstrate exceptional circumstances.
I understand that ministerial guidance has made it clear that unmet housing need should not be taken as exceptional circumstances.

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

Attached documents:

Comment ID: PSLPP16/3744  Respondent: 8885217 / Rupert and Claire Jackson  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I write to record my concerns and objections to The Guildford Plan with particular regard to the village of West Horsley.

These are as follows:

1. Green Belt

There are no special circumstances which justify taking the village of West Horsley out of the Green Belt. This is an ancient village set in beautiful countryside set at the foot of the North Downs but within commuting distance of London. If this area becomes developed further, the South East and in particular Surrey, will become a suburban area with no countryside which benefits both residents and visitors alike.

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

Attached documents:

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Comment ID: PSLPP16/1193  Respondent: 8886497 / Quentin Bradshaw  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

The Guildford Borough Proposed submission Local Plan: Strategy and Sites: June 2016

I am writing with regard to the consultation on the Guildford Plan. I am totally appalled and so disappointed that my elected officials could be so cavalier with the precious inheritance that is Surrey’s countryside. We may own this land legally, but we are all just custodians for our descendants. Without this green land, Surrey becomes just another empty, faceless, concrete, urban wilderness.

My specific objections are:

- I object to the withdrawal of the Horsley villages from the Green Belt. The Horsleys are classic examples of “the Surrey Village”. Your role is to protect these not to destroy them.
- I object to building in the Green Belt more generally, particularly in Surrey. I do not think this is necessary; houses can be built on brown field land.
- I think there is sufficient brown field land in Guildford and Woking for the necessary houses.
- Building on the Green Belt should be a last step of desperation, when all other sites are exhausted. We are a long way off that.

I strongly urge the Council to rethink these plans. Once the Green Belt is destroyed, it can never be recovered.

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

Attached documents:

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Comment ID: PSLPP16/7606  Respondent: 8886849 / Marjory Arnold  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

1. I object to building on the green belt. I want space between Guildford and nearby villages
2. I object to changes being made to green belt boundaries
3. I object to the scale of new building throughout the borough. I feel it is unnecessary for the needs of Guildford. Guildford should not be used for London overspill.

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4. I object to brownfield sites being used for yet more commercial properties instead of for housing.
5. I object to the fact that infrastructure has not been properly assessed and is inadequate to deal with government housing levels – roads, doctors, schools will not be able to cope.
6. I object that housing on the green belt will increase traffic bringing increased danger and pollution and slower journey times on already crowded roads.
7. I object to all other strategic sites in the local plan, Blackwell Farm, 3 Farms Meadows, Garlick’s Arch, West Horsley and Hog’s Back. All are out of proportion to the surrounding area, and none qualify for the exceptional circumstances required to take them out of the green belt.
8. I object specifically to proposed building on Gosden Hill Farm on green belt designated to prevent West Clandon being absorbed into a sprawling urban environment four times the size of West Clandon village. I have lived in the village for 47 years and do not want it to lose its identity. Guildford roads are unable to cope with the present volume of traffic. They need to be improved before any more properties are built. The area is congested enough already. Do not encourage more building in this area.

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

Attached documents:
1. Send Village should remain in the Green Belt. The village of Send with its proximity on the border of Woking is a village which fulfils paragraph 80 of the NPPF which stipulates that Green Belt is to check unrestricted sprawl of large built-up areas and to prevent neighbouring towns from merging. Paragraphs 79-86 of the NPPF should therefore be applied to Send as a constraint and Send should not be removed from the Green Belt.

3) Moreover the basis for Policy P2 is the Guildford Borough Green Belt and Countryside Study.

3a) Guildford Borough Green Belt and Countryside Study has lacked consistency to Green Belt boundaries. Land in Send Parish which was initially identified as Green Belt within the evidence base document, Guildford Borough Green Belt and Countryside Study - Volume IV (2014) has now been allocated for housing development as sites A43 and A44.

3b) Elsewhere Guildford Borough Green Belt and Countryside Study is used to rule out other sites which meet the GBC Flood Risk Sequential and Exception Test( May 2016), See Appendix I Stage 1, 2 and 3 page 25. Again there is a lack of consistency in approach.

4) The Settlement Hierarchy is another key evidenced based document for Policy P2 which is unfounded. It makes a subjective decision that Send Marsh and Burnt Common are categorised as a large village due to their proximity to Send services. In practise this is a small convenience store attached to a garage/fuel station. Had this not been so Send Marsh and Burnt Common would have been classified a medium village. Medium villages are unsuitable for substantial growth (such as site A43 Garlick’s Arch). Please refer further to “Representations on behalf of Send Parish Council by Tibbalds Planning and Urban Design consultants).

I also object to Policy D4 Development in Urban Areas and Inset Villages for all the reasons above.

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

Attached documents:

Comment ID: pslp171/1312  Respondent: 8886945 / Brian Osborn  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I also object to Green Belt Policy 2 at paragraph 4.3.15. Proposals to remove Business Park from the Green Belt and to expand it into a strategic employment site. These proposals will make the Tannery Lane junction with Send Road (A247) dangerous with so much additional traffic using this junction.

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

Attached documents:

Comment ID: PSLPP16/14186  Respondent: 8887009 / Jacqueline Weller  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Local Plan Policy P2 - GBC appears to be in breach of this policy itself through the housing policies that it has set out in the Local Plan. The analysis included in the Appendix shows that around 65% of the developments proposed in the Proposed Submission Local Plan are to be built on land currently within the Metropolitan Green Belt. Under NPPF rules, GBC is permitted to make allowance for factors which may constrain the delivery of new housing, such as the need to protect the Metropolitan Green Belt or the restrictions required to protect the Surrey Hills Area of Outstanding Natural Beauty (‘AONB’) which is offered protection under the NPPF comparable to that of a national park.
Although these areas make up a large proportion of the land area of Guildford Borough, GBC makes no attempt to reduce its housing delivery in order to take account of such constraints. This is unacceptable.

I OBJECT to the Proposal to inset East Horsley from the Green Belt and request that this proposal be dropped from the Local Plan.

I OBJECT to Settlement Boundary changes in East Horsley, specifically the boundary changes, which have been proposed to move the East Horsley settlement boundary westwards from behind the houses on the west side of Ockham Road North up to the eastern boundary of Lollesworth Wood and the proposal to move the East Horsley settlement boundary westwards from behind the houses on the west side of Kingston Avenue up to a tree line running along the Parish Boundary at the western edge of Kingston Meadows. The result is to take all of Kingston Meadows out of the Green Belt.

I also OBJECT to the proposal to remove Wisley Airfield from the Green Belt.

POLICY P2: Limited In-filling

I OBJECT to the proposal to designate roads south of the A246 as being within the ‘identified boundary of the village’ and to allow limited infilling within this area.

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

Attached documents:

Comment ID: PSLPP16/13586  Respondent: 8887265 / Harvey Weller  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

I OBJECT to Local Plan Policy P2 - GBC appears to be in breach of this policy itself through the housing policies that it has set out in the Local Plan. The analysis included in the Appendix shows that around 65% of the developments proposed in the Proposed Submission Local Plan are to be built on land currently within the Metropolitan Green Belt. Under NPPF rules, GBC is permitted to make allowance for factors which may constrain the delivery of new housing, such as the need to protect the Metropolitan Green Belt or the restrictions required to protect the Surrey Hills Area of Outstanding Natural Beauty (‘AONB’) which is offered protection under the NPPF comparable to that of a national park. Although these areas make up a large proportion of the land area of Guildford Borough, GBC makes no attempt to reduce its housing delivery in order to take account of such constraints. This is unacceptable.

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

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

POLICY P2: Limited In-filling

I OBJECT to the proposal to designate roads south of the A246 as being within the ‘identified boundary of the village’ and to allow limited infilling within this area.

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

Attached documents:

Comment ID: PSLPP16/5057  Respondent: 8887297 / Ian C Milne  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  
To my knowledge no exceptional circumstances, as defined by The National Planning Policy Framework, have been disclosed, which permit changes to the Green Belt boundary. The Green Belt boundary should therefore remain.

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

Attached documents:

Comment ID: PSLPP16/3905  Respondent: 8887745 / Jan Wollard  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  
Green Belt

I strongly object to the Horsleys being removed from the Green Belt. This is a beautiful area which is peaceful and friendly, although in recent years the traffic through the village has become a problem and localised flooding is becoming worse. The more housing that is built, water has nowhere to go. It seems that GBC has taken little notice of the concerns of residents who are totally aware of the problems we will face if all these houses are built. As mentioned before, for every house built, we can expect two extra cars on our roads. What are you thinking?

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

Attached documents:

Comment ID: PSLPP16/9946  Respondent: 8887873 / S E Lea  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  
1. Removal of Green Belt Status
I object to the proposal to remove the Green Belt Status of a number of villages in the borough, including West Horsley. This directly contradicts the Government's National Planning Policy Framework, published in March 2012, which states in Section 9, point 79 "The Government attaches great importance to Green Belts. The fundamental aim of the Green Belt Policy is to prevent urban sprawl by keeping land open; the essential characteristics of Green Belts are the iropennessand their permanence." and in point 82 "The general extent of Green Belts across the country is already established. New Green Belts should only be established in exceptional circumstances, for example, when planning to larger scale development such as new settlements or major urban extensions."

The Guildford Plan states "We will continue to protect the Metropolitan Belt". However, the Guildford Plan proposes to remove green belt status from a number of villages in the borough, including East and West Horsley. Guildford Borough Council has not demonstrated 'exceptional circumstances' in justification of these proposals. No sound reasons have been provided and it seems that development land is being made available solely driven by profit for the benefit of developers and land owners, not the need for more housing.

1. Proposal to Inset West Horsley from the Green Belt

I object to the proposal that West Horsley be inset from the Green Belt instead of being washed over by it as it is at present.

West Horsley is a very old village with 43 listed buildings including a number of old houses and barns built before 1700. The village lies adjacent to the Surrey Hills Area of Outstanding Natural Beauty; as a result of this the village attracts a large number of walkers and cyclists who come to enjoy the many quiet lanes and footpaths in the open countryside. As a result of the proposal to inset the village from the Green Belt, any large-scale developments would completely destroy the rural character of this small village.

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

Attached documents:

Comment ID: pslp171/2218  Respondent: 8887873 / S E Lea  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

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

The reduction in the number of new homes proposed within the Green Belt, following the 2016 Consultation, does not go far enough in reducing the very large number of new dwellings proposed on the Green Belt. This will result in the needless loss of Green Belt, thus contradicting the Government's National Planning Policy Framework, published in March 2012, which states in Section 9, point 79 "The Government attaches great importance to Green Belts. The fundamental aim of Green Belt Policy is to prevent urban sprawl by keeping land open; the essential characteristics of Green Belts are their openness and their permanence." and in point 82 "The general extent of Green Belts across the country is already established. New Green Belts should only be established in exceptional circumstances, for example, when planning for larger scale development such as new settlements or major urban extensions."

Despite claims that it will continue to protect the Metropolitan Green Belt, Guildford Borough Council still proposes to remove large areas of the Green Belt for development.

It is totally unacceptable that Guildford Borough Council is choosing not to constrain its overall housing growth to protect the Green Belt, as many other Councils have done, and continues to rely upon flawed evidence to justify over-expansion.

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

Attached documents:

Comment ID: PSLPP16/4779  Respondent: 8888289 / Hazel Jones  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/2934</th>
<th>Respondent: 8888449 / Phillip Marazzi</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<tr>
<td>I strongly object to the proposed extension of boundaries of the Settlement areas of the Horsleys and their removal from the Green Belt. What are the 'exceptional circumstances' which require such a drastic step? I consider this just a ruse to enable any future development to be enforced with minimum trouble. I do appreciate that more housing is necessary but the proposal for six main sites and 533 new houses in the Horsley villages is excessive.</td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td>Attached documents:</td>
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</tbody>
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<tr>
<th>Comment ID: PSLPP16/9627</th>
<th>Respondent: 8888961 / Susan Fortune</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<tr>
<td>Local wildlife is under pressure. The Green Belt remains a hugely important protection for the area, and more building with more people and more traffic will undoubtedly have detrimental effect on many species clinging on in the area. I have personally spent long periods observing and photographing very delicate species such as barn owls. They will not survive this expansion as it has been shown time and again that traffic pressures have a devastating effect on many species.</td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td>Attached documents:</td>
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<tr>
<th>Comment ID: PSLPP16/17573</th>
<th>Respondent: 8889761 / A Dougherty</th>
<th>Agent:</th>
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<tbody>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<tr>
<td>The Government has stated that Green Belt land should be built on only in extreme circumstances, confirmed by our MP. I do not believe that there is evidence of extreme circumstance that would warrant the insetting of the Horsleys and therefore the change of village boundary and the Green Belt status of the surrounding land. It is essential that Green Belt land is maintained as sacrosanct. It gives enjoyment to thousands as evidenced almost every day and especially at weekends. To remove it would make a mockery of the Borough's previous recent entreaties to encourage cycling tourism for example. By removing it the Borough would destroy the very thing that makes this area so attractive and cause irrevocable damage to the environment.</td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td>Attached documents:</td>
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</table>
GBC does not appear to have followed the NPPF criteria, its policy's and guidance. Again mitigating any 'Due Diligence' in respect of the Local Plan put forward and ignoring unprotected areas in preference to creating Urban Sprawl, destroying areas of designated protected Greenbelt with 'NO' 'Exceptional Circumstances being put forward. As such this goes against the NPPF Policy and the document as set out by Mr Brandon Lewis MP letter of 7/6/2016.

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

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/17575</th>
<th>Respondent: 8889761 / A Dougherty</th>
<th>Agent:</th>
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</table>

2. I OBJECT to the use of the Green Belt Land(P2) for development as there are NO EXCEPTIONAL CIRCUMSTANCES to do so.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/3665</th>
<th>Respondent: 8890465 / Saskia Horst</th>
<th>Agent:</th>
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</table>

One of the main reasons we moved to East Horsley 18 years ago was to enjoy the protected Green Belt which is so important to all living here.

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

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/4218</th>
<th>Respondent: 8890657 / David Weight</th>
<th>Agent:</th>
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</table>

3. Paragraph 7 of the National Planning Policy Framework states: "As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances". We see from The Plan that green-belt land is being inset for building and less emphasis has been placed on the development of previously developed or brown-field sites in the area. No special circumstances exist to support The Plan's proposals and so green-belt developments in West Horsley should not be considered. I object to the proposed development of Green Belt land.

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

Attached documents:
- Green belt – The plan states ‘That we will continue to Protect the Metroploitan Green belt’ this appears to be in direct conflict with the proposal to remove the Horsleys from the Green belt – There would also appear to be no sound reason given for extending the boundaries of the settlement area of the Horsleys one has to conclude that the idea is to make extra land available for future additional developments by an unacceptable route and this together with removal from the Green belt is therefore totally unacceptable

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

Attached documents:

I also object strongly to Policy A46 Land south of Normandy and north of Flexford being build upon. It is an inappropriate size of development housing and school in an area of rural roads, two small railway bridges and it is totally unsuitable to increase the traffic on these unclassified roads. I lived there for the first 20 years of my life. I know the beauty the area has, this should not be sacrificed to increase housing. The congestion to surrounding villages is totally ridiculous. The infrastructure in this borough is not there to cope with 1000+ homes. Is there a need for this school?

P2 Green belt and limited infilling. The coalescence between the urban area of Guildford and the surrounding villages and also Guildford with the surrounding boroughs should be strenuously resisted.

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

Attached documents:

We have seen the proposals in your new local plan published on June 6th, and would like you to take into consideration our very strong objection to these proposals.

We came to live in West Horsley nearly eighteen years ago and one of the main reasons we decided on this village was its lack of urbanisation. With the protection of the Green Belt and, in the case of our home, the Conservation Area, little has changed to affect the rural nature of our environment. Your proposals, however, would completely change the situation.

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

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

We strongly object to the Draft Local Plan 2016 due to the following:-

1) While you assert that you wish to protect the Green Belt, 65% of the new development will take place on Green Belt land.

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

Attached documents:

I OBJECT to the proposed removal of West & East Horsley from the Green Belt because the requisite "exceptional circumstances" required have NOT been demonstrated in any way and such a dramatic change would adversely impact on the streetscene and rural ambiance of the two villages. Indeed, in Paragraph 79 of the government's own National Planning Policy Framework (NPPF), it states:-

The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

Furthermore, under paragraph 82 of the government's NPPF document, it states:

The general extent of Green Belts across the country is already established.

New Green Belts should only be established in exceptional circumstances, for example when planning for larger scale development such as new settlements or major urban extensions. If proposing a new Green Belt, local planning authorities should:

- demonstrate why normal planning and development management policies would not be adequate;
- set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary;
- show what the consequences of the proposal would be for sustainable development;
- demonstrate the necessity for the Green Belt and its consistency with local Plans for adjoining areas; and
- show how the Green Belt would meet the other objectives of the Framework.

Furthermore, I fundamentally disagree with the Draft Local Plan's wording that "the general extent of the Green Belt has been retained". The Green Belt (including the Metropolitan Green Belt) is an invaluable asset and amenity, not just to those that live within it but to the nation as a whole and any erosion to its boundaries now will make it so much easier for others to denude it further and further as the years go by to the extent that it will be gone forever. Unconscionable as that is to me, the dilution and destruction of the Green Belt when brown field sites are not only preferable but available, indicates a disappointing lack of concern and responsibility by Guildford Borough Council.

Per the Draft Local Plan, GBC's intention is to inset no fewer than 14 villages which will inevitably have a dramatic and hugely damaging impact on the Borough. Furthermore, an approximate calculation from the information provided in the Draft Local Plan, indicates that as much as 7% of the Green Belt will be lost. Equally, slightly over 8,000 houses are planned to be built on current Green Belt designated land, of which only 14% is earmarked for Guildford.
I **OBJECT** and furthermore fundamentally disagree with the Local Plan's wording that "the general extent of the Green Belt has been retained". The Green Belt (including the Metropolitan Green Belt) is an invaluable asset and amenity, not just to those that live within it but to the nation as a whole and any erosion to its boundaries now will make it so much easier for others to denude it further and further as the years go by to the extent that it will be gone forever.

Unconscionable as that is to me, its dilution and destruction when brown field sites are not only preferable but available, indicates a disappointing lack of concern and responsibility by Guildford Borough Council.

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

**Attached documents:**

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**REMOVAL OF WEST & EAST HORSLEY FROM THE GREEN BELT**

I **OBJECT** to the proposed removal of West & East Horsley from the Green Belt because the requisite “exceptional circumstances” required have NOT been demonstrated in any way and such a dramatic change would adversely impact on the streetscene and rural ambiance of the two villages. Indeed, in Paragraph 79 of the government’s own National Planning Policy Framework (NPPF), it states:-

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- demonstrate why normal planning and development management policies would not be adequate;
- set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary;
- show what the consequences of the proposal would be for sustainable development;
- demonstrate the necessity for the Green Belt and its consistency with Local Plans for adjoining areas; and
- show how the Green Belt would meet the other objectives of the Framework.

Furthermore, I fundamentally disagree with the Draft Local Plan’s wording that “the general extent of the Green Belt has been retained”. The Green Belt (including the Metropolitan Green Belt) is an invaluable asset and amenity, not just to
those that live within it but to the nation as a whole and any erosion to its boundaries now will make it so much easier for others to denude it further and further as the years go by to the extent that it will be gone forever. Unconscionable as that is to me, the dilution and destruction of the Green Belt when brown field sites are not only preferable but available, indicates a disappointing lack of concern and responsibility by Guildford Borough Council.

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

Attached documents:

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**Comment ID:** PSLPP16/16599  **Respondent:** 8892353 / Elizabeth Russell  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

**POLICY P2 – Green Belt**

I **OBJECT** and furthermore fundamentally disagree with the Local Plan’s wording that “the general extent of the Green Belt has been retained”. The Green Belt (including the Metropolitan Green Belt) is an invaluable asset and amenity, not just to those that live within it but to the nation as a whole and any erosion to its boundaries now will make it so much easier for others to denude it further and further as the years go by to the extent that it will be gone forever. Unconscionable as that is to me, its dilution and destruction when brown field sites are not only preferable but available, indicates a disappointing lack of concern and responsibility by Guildford Borough Council.

Per the Draft Local Plan, GBC’s intention is to inset no fewer than 14 villages which will inevitably have a dramatic and hugely damaging impact on the Borough. Furthermore, an approximate calculation from the information provided in the Draft Local Plan, indicates that as much as 7% of the Green Belt will be lost. Equally, slightly over 8,000 houses are planned to be built on current Green Belt designated land, of which only 14% is earmarked for Guildford.

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

Attached documents:

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**Comment ID:** PSLPP16/4585  **Respondent:** 8892673 / Nick Forwood  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

3. I object to not protecting the Green Belt (Policy P2)

I object to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages and the land to be taken from the Green Belt.

There is a real danger that the loss of this Greenbelt will result in a mess of urban sprawl and the neighbouring villages merging into one another. The significance of this development, will result in the character of these villages being lost and the natural habitat and countryside being encroached.
I am bemused to why the existing brownfield site just to the south of the site at Burnt Common, has not been considered.

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

Attached documents:

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Comment ID: PSLPP16/9265  Respondent: 8892737 / David Eagle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development,
claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

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

Attached documents:


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

The Green belts were originally conceived as a "lung" around urban centres, which in Surrey's case was to serve London. The parishes of East and West Horsley fulfil this function providing areas of recreation for London to the north and the nearby towns of Guildford, Leatherhead and Woking with large numbers visiting the area every week to enjoy the relief of being away from these densely developed centres. The importance of the Green Belt to the conurbation grows year by year.

The Green Belt reinforced the first planning controls brought in in 1939 to control the lazy land hungry ribbon development out from London and other conurbations.

It is quite clear that the policy was a success and has fulfilled the objectives.
The designation of The Horsley's as Green Belt has produced a slow and sustainable change in housing stock as it is modernised and reorganised to meet modern demand and demographics.

No credible planning case has been presented for removing the Green Belt designation beyond the fact that only a limited population live in the area, it would be odd if a large population lived in a Green Belt area by definition and the process has failed to consider the large number of weekly visitors to the area using the Green Belt for what it was conceived for.

If the Horsley's were to be removed then new planning controls to protect the character of the area and its setting in the surrounding landscape would be required including conservation areas and design standards applying to large areas. These controls tend to prevent the delivery of housing and the modernisation of the existing stock by raising the level the bureaucracy preventing development.

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

Attached documents:

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<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>P2 Greenbelt</td>
<td>I Object to this policy as the wording is far weaker than previous versions. Villages have been inset and infilled making them more vulnerable to large blocks of development. In Gomshall and Shere villages for example gardens and small houses have been replaced by several two and three storey dwellings, one single storey bungalow on Queen street Gomshall has been replaced by two three storey houses with no parking, in addition to 26 houses which replaced 11 single storey bungalows nearby. The whole character has already changed and parking is becoming an increasing problem as is the amount of traffic. This is Greenbelt and should be protected for future generations. Development should be monitored and strictly limited.</td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Attached documents:</td>
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<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>1.1 We object to Policy P2 green belt</td>
<td>This policy states, “the general extent of the Green Belt has been retained.” This is completely false.</td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<tr>
<td>Attached documents:</td>
<td>1.2 This policy states, “the general extent of the Green Belt has been retained.” This is completely false.</td>
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<tr>
<td>1.3 The policy wording is weak in support of the Metropolitan Green Belt even though the latter forms 89% of the borough and should be the cornerstone of all local planning policy. It is precious beyond the short-term demands of the present Government’s policy or a 15-year local plan. As noted under Policy S1 above, it is a solemn legacy to future generations – an asset and amenity that belongs as much to Londoners and the whole nation as to the people who live in it. It is an inalienable public good. Once gone it is gone forever. It is not the Council’s to give away. 1.4 Policy P2 completely fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it has been around for a long time and it needs to be permanently protected. It was actually established in a local act of parliament in Guildford under the London Home Counties (Green Belt) Act 1938 and subsequently in the 1944 Greater London Plan to contain the outward sprawl of London. The boundaries of the Green Belt through Guildford Borough</td>
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were later defined in the 1987 Local Plan, forming part of a 19-24km concentric belt around London. The Green Belt is intended to check the unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and other urban land. The principles of the Green Belt designation were outlined within Planning Policy Guidance 2: Green Belts (PPG2) and are found within the National Planning Policy Framework (NPPF). The Metropolitan Green Belt is an exemplar of good planning and the envy of planners throughout the world.

1.5 Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. Building on it involves high opportunity costs, including an irreversible loss of:

1. Agricultural production
2. Rural leisure and tourism amenities
3. Water catchment
4. Flood control
5. Biodiversity
6. Natural heritage
7. A carbon sink for air pollution
8. Room for public facilities such as parks and burial grounds
9. Profitable film locations (e.g. Shere)
10. Future economic potential such as mineral extraction (even fracking)
11. Natural beauty, landmarks, open space, rural views and sight lines
12. Benefits to public health and wellbeing, physical and psychological (as well expressed in the NPPF)

1.6 As a matter of law and national and local policy, these assets should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultations.

1.7 It is quite incorrect to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold. No-one argues that we should sell 1.6% of the Crown jewels in order to build houses.

1.8 We object to the “insetting” of 14 villages from the Green Belt, and at “infilling” 12 of the borough’s Green Belt villages. I am deeply disturbed that settlement boundaries are to be hugely extended in many villages and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are “leggy” in outline, reflecting the effect of ribbon development (often along just one side of existing roads) permitted between the Wars. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost hell bent on self-defeat.

1.9 We believe this policy is based on a flawed Green Belt and Countryside Study that, according to one Conservative Councillor, was irregularly commissioned by Council officers without the authority of Councillors.
1.10 To “inset” two thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, although they would quickly destroy them if the proposed “insetting” and boundary extensions go ahead. This policy is wildly disproportionate in terms of any foreseeable development need (especially post-Brexit) and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

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

**Attached documents:**

<table>
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<tr>
<th>Comment ID: PSLPP16/4842</th>
<th>Respondent: 8893697 / Gill Woolfson</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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**I object to Policy P2 insetting of Normandy & Flexford**

P2 mentions Normandy and Flexford separately in the list of villages to be inset in the Green Belt. However, The new Green Belt Boundary, which loops round Normandy and Flexford and includes A46, shows that they have been considered as one village.

Of course both Normandy and Flexford both contribute to the openness of the Green Belt. GBC acknowledge that it is the most sensitive Green Belt. Therefore it should not be inset as it would not be sustainable.

I also object to the settlement boundary as not being defensible. The obvious place for the boundary is the continuation of Glaziers Lane, not extending round Little Flexford, with inadequate boundaries to the south and east.

NPPF 86 refers

**I object to Policy P2 4.3.17, the creation of Green Belt between Ash Green and Ash/Tongham**

"The Green Belt boundary has also been extended between Ash Green village and the Ash and Tongham urban area in order to prevent coalescence."

New Green Belts should only be established in exceptional circumstances, for example when planning for larger scale development such as new settlements or major urban extensions.

This is not the case here.

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

**Attached documents:**

<table>
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<tr>
<th>Comment ID: PSLPP16/12603</th>
<th>Respondent: 8894657 / Jacob's Well Residents' Association (Janet Smith)</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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I object to the removal of the village of Jacobs Well from the Green Belt. Infilling in our village has already led to planning permission being granted for developments which are totally out of character with the surrounding properties.
I object to the use of large swathes of Green Belt land for development. National policy attaches great importance to the openness and permanence of the Green Belt and this openness has a significant part to play in the well being of our population. The heritage of future generations should not be squandered.

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

Attached documents:

Comment ID: PSLPP16/8393  Respondent: 8894977 / Janet Burgess  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the proposals in the DLP to build some 65% of new houses in the current greenbelt and the insetting of many villages to facilitate this, more so since I understand the leader of the council proposes to CREATE a new greenbelt area in his own and his predecessor's community. GBC's Conservative group was re-elected on a manifesto promise to protect the greenbelt and this Government's advice is clear that housing need alone is not adequate grounds for building on the greenbelt. Insufficient use has been made of brownfield sites, much being earmarked for commercial development (a sector in decline with in the borough given the growth of on-line shopping, etc.), and the number of houses planned in the urban areas is, I believe, too low. It would seem that regeneration of some areas has been ignored with the plan concentrating instead on the building of homes on greenfield sites. This is not a sustainable policy given the disproportionate effect it will have on traffic generation (for which there is no adequate infrastructure). For these reasons alone the DLP, in its current form, should be rejected.

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

Attached documents:

Comment ID: PSLPP16/3085  Respondent: 8895201 / M D Ede  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing to strongly object to the village of Chilworth being removed from the Green Belt.

We have had a lot of development over the years, and I feel Chilworth has had more than enough development.

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

Attached documents:

Comment ID: PSLPP16/3390  Respondent: 8895233 / Clare Axten  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the removal of villages from the Green Belt.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/9110</th>
<th>Respondent: 8895265 / Peter Wood</th>
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I am strongly against the Draft Local Plan on a number of points, including:

I object encroachment onto the Green Belt: GBC has failed to demonstrate that exceptional circumstances exist to adjust the boundaries of the Green Belt. Once lost, this land will never be green again. GBC must go further in utilising all brown-file sites and should go further in protecting green sites for generations to come.

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

Attached documents:

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<th>Comment ID: PSLPP16/2789</th>
<th>Respondent: 8895617 / C Sutton</th>
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Dear Sir or Madam,

I wish to register my objection to the proposed in the above mentioned plan to remove Green Belt protection from a number of local villiages, in particular Chilworth and Shalford

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

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/12137</th>
<th>Respondent: 8896097 / Andrew Fordham</th>
<th>Agent:</th>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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3. POLICY P2

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public
The countryside encroached. The significant development in these villages will result in the character of these villages being lost and lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The NPPF requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be calculated to secure the rejection of the plan as a whole. Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth and I consider this to be a deliberate untruth which compromises the consultation process. I object to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole. To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead. This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions. Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt. The NPPF requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.
GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

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

Related documents:

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<tr>
<th>Comment ID: PSLPP16/12164</th>
<th>Respondent: 8896097 / Andrew Fordham</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

19. SITES - POLICIES A1 TO A57

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

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

Attachment documents:

| Comment ID: PSLPP16/14753 | Respondent: 8896161 / Carol Wilson | Agent: |
Policy P2: Green Belt and the countryside

This is what the NPPF says the Green Belt is for:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

I OBJECT to the Green Belt and the Countryside policy for the following reasons:

It is completely illogical on the one hand to say that “you will continue to protect the Metropolitan Green Belt” when in fact you are proposing to put 70% of all new developments in the Green Belt! He Conservative party also promised to preserve the Green Belt.

There are no exceptional circumstances mentioned for removal of parts of the Green Belt. Housing is not an exceptional circumstance (NPPF)

There is plenty of Brownfield to use. Of course it is often more expensive to prepare a brownfield site for building, but this has to be done – it’s called recycling which is advocated in another part of the plan. Recycling of derelict and other urban land is encouraged by NPPF’s statement above.

Greedy developers prefer the cheaper more damaging option.

I object to the proposals to inset 14 villages from the Green Belt and to change the settlement boundaries particularly in the cases of East Horsley, Effingham, Jacobs Well, Ripley, Send, Send Marsh/Burnt Common and West Horsley. Land can only be removed from the Green Belt in exceptional circumstances. Housing is not a special circumstance.

West Horsley is a small village dating back to the Saxons. It is adjacent to the National Trust Hatchlands Estate, and also has 41 listed buildings. Part of West Horsley is in a Conservation Area.

It now consists predominantly of mixed, and generally quite old houses along either side of a long road, The Street. There are some small developments, again of mixed housing, on adjoining roads. There are two old traditional pubs, one towards the north (dating back to c. 1500) and the other towards the south (dating back to pre-1800). There is one village shop, shortly to close down, because of parking problems. Further to the south, Shere Road is again a long road going up towards the North Downs Way, and with a variety of housing either side, pretty well all with direct views to the countryside.

In other words, most of West Horsley is a typical small, old village with ribbon development. Indeed, if from any house you cannot see directly to the surrounding countryside, it is not more than a one-minute walk to enjoy the wonderful rural views.

I OBJECT to the proposed density and numbers of houses to be built in both West and East Horsley.

I OBJECT to the removal of Three Farms Meadow from the Green Belt.

In particular I OBJECT to the proposal to build 385 homes in West Horsley. That would represent a colossal percentage increase in the number of houses in West Horsley and would completely destroy its rural village nature.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp171/1024  **Respondent:** 8896161 / Carol Wilson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

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

I object to the amount of building proposed on the Green Belt. Policies and promises are being broken in this plan in a shameful way. Housing is not a special circumstance. The density proposed is not in keeping with current densities. 57% of proposed new homes are on the Green Belt. How can this be in agreement with promises to protect the Green Belt by the government and by the Council?

I object to the insetting of villages from the Green Belt and object to the fact that no changes are proposed to this damaging idea. My local villages of East and West Horsley would be severely affected and the openness of the landscape would be compromised.

The Green Belt has the job of protecting the area from London sprawl and is therefore especially important to the east, adjacent to the M25.

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

Attached documents:

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**Comment ID:** PSLPP16/6731  **Respondent:** 8896673 / James Gooden  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

GREEN BELT

We object to the GBC Planning Policy team ignoring the "Openness" of the Green Belt land between Normandy and Flexford (recognised as such in the Green Belt and Countryside Study documents).

Such a large development as proposed would bring with it a huge increase in street lighting which would generate significant light pollution. This would be easily visible from the Surrey Hills AONB ruining the view for all time, for residents and visitors to the area.

Furthermore, Policy 14 also states that "permission would not be granted for proposals that are likely to materially harm the nature conservation interest of local sites unless clear justification is proved that the need for development clearly outweighs the impact on biodiversity". If there was no "alleged" need for a Secondary School in the West of the Borough, the THBSPA and SSSI would not allow this site to be taken out of Green Belt.

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

Attached documents:

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

In Conclusion - we object to the fact that Green Belt is being eroded by disproportionate 'strategic sites' without secure funding for infrastructure and road improvements, inset villages, insetting, the manipulation of boundaries, using rural exception sites outside settlement areas for the whole Borough rather than 'needs' of individual rural communities.

Guildford and the surrounding village and countryside will be damaged irreparably.

NPPF 17 requires local authorities to 'take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the greenbelts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving communities within it.' GBC Draft Local Plan does not meet the requirement of Policies S2, H3, P6, 04).

USE BROWNFIELD SITES FIRST

It would seem far more sensible to build more homes on Brownfield Sites first. These should be in or near Guildford town centre - close to the station and existing services eg Woodbridge Meadows, Walnut Tree Close and North Street. Normandy’s station is a tiny rural station (Wanborough) which would in no way support the proposed 100% population increase.

It would be better to provide accommodation for 80-90% of university students on campus, freeing up hundreds of homes in the town - instead of GBC's proposed 60% of university students living on campus.

Redundant retail space should be turned into homes as there should be no need for massive retail expansion in the town (due to traditional retail activity falls resulting from increased internet shopping habits).

We trust that our comments will be considered carefully by GBC before the Local Plan is finalised.

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

Attached documents:

Comment ID: PSLPP16/425  Respondent: 8896929 / Desmond Finnan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

Reference to the plan for the Horsleys

I object to this new plan because the councillors promised to protect the Green Belt. Did the political candidates just say this to get votes and then ignore their promise once elected thinking there will be nothing the public can do? This is third world stuff and not worthy of Guildford Borough Council. Shame on you.

I object to the shear number of extra houses proposed for Horsley, West Horsley in particular. I think a little in-filling might be acceptable IF the need for extra houses has been shown now, which it has not been in the near past. The character of the village will change. The additional percentage increase is totally unreasonable.

I object to the lack of common sense being applied to this suggested plan insofar as our infrastructure cannot take many more houses. Schools are full, car parks are full already and the doctors’ surgery has a long appointment wait time. Also, what about the flooding in Horsley, at the moment not under control?
When I lived in Cobham I sometimes could not park at the shops and drove home again empty-handed. This is a sorry way to live.

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

Think again if you wish to retain your council seat. You will not be voted for again.

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

Attached documents:

Comment ID: PSLPP16/10837  Respondent: 8896929 / Desmond Finnan  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to this new plan because the councillors promised to protect the Green Belt. Did the political candidates just say this to get votes and then ignore their promise once elected thinking there will be nothing the public can do? This is third world stuff and not worthy of Guildford Borough Council. Shame on you.

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

Attached documents:

Comment ID: PSLPP16/12379  Respondent: 8897089 / Pauline Rowland  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I strongly object to this proposal as it would lead to over development and ruin the character of the areas concerned. There are many brown field sites in and around Guildford without the need to destroy our villages. Small infilling developments may be needed but not on the scale proposed. The villages simply do not have the infrastructure or facilities to cope with large scale building and would be ruined for ever.

The Green Belt should and must remain intact at all costs.

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

Attached documents:

Comment ID: PSLPP16/4417  Respondent: 8897377 / Jan Jewers  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

2. I object to any insetting (removal) of any villages from the Green Belt
3. I object to the loss of Green Belt and breaking protection promises
5. I object to creating new Green Belt when taking away Green Belt

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

Attached documents:

Comment ID: PSLPP16/4381  Respondent: 8897505 / Michael Dickins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

DRAFT LOCAL PLAN – CONSULTATION

East Horsley and West Horsley, and other villages in Surrey

This letter addresses in particular the proposals contained in the June 2016 Guildford BC Draft Local Plan for substantial extra housing across the Borough, and particularly in the Horsleys where I live, over a period 2013 - 33. I OBJECT to the proposals on several grounds.

The Plan seriously jeopardises two of the most picturesque and unspoilt villages in the south-east. It will impinge on valuable green belt, and impose an insupportable burden on local schools, the road network, drainage, infrastructure, medical services, shopping facilities and public transport, and change the character and amenity of the community – contradicting a specific promise within the document (Policies P1, P2, P3), and ignoring the huge contribution of openness these villages make just outside London.

I vehemently object to any proposals which remove the restrictions on development over our much-needed and prized Metropolitan green belt – the shrinking “life-blood” which makes living so close to London remotely bearable. I am utterly astonished that the Borough, and our local and government politicians, who have in the past defended the community they serve against all and any proposals for even minor building within the green belt, could even now contemplate such ridiculous extension of the built-up area into such precious landscapes. Merely “re-designating” these villages as “outside the green belt” is just using weasly words to avoid contradicting statements suggesting the Borough (and Government) are not proposing development over green belt. The Plan (4.1.13) admits that 65% of all their new housing proposals are on Green Belt.

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

Attached documents:

Comment ID: PSLPP16/4386  Respondent: 8897505 / Michael Dickins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

• avoid development over our precious greenbel and spoiling the landscape we desperately need close to major conurbations including London. The Draft Plan not only proposes to remove the protection of the green belt from across the Horsley villages, but actually adds a number of additional “undesignated” areas, as well as some 590 additional houses, adjacent to the current “settlement” boundary, both of which can only be designed (obviously) to encourage further and denser development in the future above and beyond those actually identified in the Plan.

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

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

- Recognise that if any expansion into the Green Belt is proved absolutely necessary, by simple geometry, it would have less impact the farther away it is from the circumference of London which is already under severe threat.

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

To summarise, I say NO to:

- Any proposals to remove Surrey villages close to London from the safeguards of green belt status. No exceptional circumstances have been demonstrated.

- Any development which seriously enlarges existing villages, except by the careful addition of a few acres, perhaps by very limited “smoothing” of the existing settlement boundaries, so that local people still need walk only a few yards to enjoy the countryside. Such isolated acres do exist for small developments.

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

I very strongly object to the removal of our villages from the Greenbelt (insetting them), to the proposals to increase the settlement area of East Horsley by 13%, and to any limited infilling on the new ‘identified boundary of the village’ despite it’s greenbelt status. In the Greenbelt there is a general presumption against inappropriate development, as outlined in the NPPF, unless very special circumstances can be demonstrated to show that the benefits of the development will outweigh the harm caused to the Greenbelt. I can see no evidence of any very special or exceptional circumstances, and therefore East and West Horsley should not be removed from the Metropolitan Greenbelt. Nor indeed do I see the need to increase the size of the settlement boundaries. In 2:27, it states that ‘The local plan needs to protect our attractive and valued environment whilst reconciling need to accommodate developmental needs.’ Whilst I understand the need to provide adequate housing, the projected housing needs are unreliable (as identified above) and housing in itself is not a sufficient reason to destroy Greenbelt, when other more suitable and sustainable Brownfield sites are available. There is a disproportionate amount of development proposed for the Greenbelt and too few new homes proposed for urban areas where most people (especially young and less privileged) want to live. And this will not help the much needed urban regeneration. So more effort to find sites in the urban areas of Guildford, rather than bigger cinema complexes or further retail when so much shopping now happens online, would be a wiser long term approach rather than destroying our precious green spaces for ever. GBC really needs to hear the voice of the people, and act on it, much as the government has just done in the referendum. Much of the opening pages of the proposed plan have laudable statements about safeguarding the environment and protecting the need for green spaces to increase the quality of life for the most
disadvantaged. Destroying open spaces, specifically the greenbelt that was set up to give such sanctuary, in order to line the pockets of greedy developers, seems to fly in the face of such points as 2:27.

Slightly detouring from this point, GBC talks about retaining and protecting AONB in perpetuity, but propose to levy payment to enjoy such places (e.g. Newlands Corner) which will deter the less privileged from accessing these places.

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

Attached documents:

Comment ID: PSLPP16/7252  Respondent: 8898081 / Sarah Bowe  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Loss of Green Belt

I object strongly to the removal of the Horsleys from the Green Belt. I believe that the sheer level of proposed development would ultimately result in the whole area from Leatherhead to Guildford and beyond becoming one huge urban sprawl. The Green Belt offers huge amenity value to both local residents and people from outside the area. This would be lost. I do not think that the housing developments meet the criteria of "exceptional circumstances" which would warrant the land being removed from Green Belt designation.

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

Attached documents:

Comment ID: PSLPP16/3401  Respondent: 8898145 / Michael Poole  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I wrote to you on 4th July to strongly protest about raising the Wisley Airfield/Three Farms Meadows saga yet again.

Now, having been appraised of other contentious issues I am adding to that complaint the proposed removal of the Horsleys and other villages from the Green Belt, for no valid reasons ...

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

Attached documents:

Comment ID: PSLPP16/33  Respondent: 8899169 / Michael Jordan  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing again to voice my opinion to try and protect our Green Belt. The Governments manifesto which we voted for was to protect the GreenBelt. My objection to use the so called protected Green Belt to build houses and industrial
estates. Future generations will not have the pleasure of green fields and bird and animal life. Once you build on this precious land it will never be. The same again.

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

Attached documents:

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**Comment ID:** PSLPP16/3746  **Respondent:** 8899489 / A.A. White  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

I OBJECT to the destruction of ANY part of the Green Belt when a sustainable requirement has not been proven AND NONE HAS.

I OBJECT to the removal of some 128 ha. of Green Belt in the areas of Send, Send Marsh, Burnt Common and Gosden Hill Farm and its conversion to concrete and tarmac.

I OBJECT to the insetting of the Send area which removes some 39 ha. from the Green Belt. By this action Guildford B.C. is promoting and encouraging residential and industrial development in an area where perceived need has NOT been proven.

I OBJECT to Guildford Council's double standards when in "About Guildford" you state the Plan rejects any schemes that would have a detrimental effect on the Green Belt. You do not appear to understand your own evidence and publicity.

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

Attached documents:

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**Comment ID:** PSLPP17/1048  **Respondent:** 8899489 / A.A. White  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

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

GREEN BELT Policy 2 paragraph 4.3.15

I OBJECT to the proposal to inset Send Business Park from the Green Belt.

This non-conforming user occupies a site surrounded by countryside and the River Wey.

Expansion of this industrial site will be detrimental to the open nature of the surrounding Green Belt.

Finally, I repeat that I am at a loss to understand why Guildford Borough Council has totally ignored objections made by Send residents during the 2016 Plan Public Consultation and why Send, and its immediate area, has been targeted as an area "ripe for development".

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

Attached documents:

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**Comment ID:** PSLPP16/13604  **Respondent:** 8899617 / Claire Nix  **Agent:**
1. I object to not protecting the Green Belt (Policy P2)

I object in the strongest possible terms to the proposal to remove the villages of Ripley, Send and Clandon from the Green Belt. This appears to be squandering a legacy and flouting National Planning Policy which requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the developments on Green Belt. Once taken the green belt is lost forever and it represents the thin end of the wedge. Proposed developments such as Garlick’s Arch would result in a spreading urban sprawl along the A3 and our beautiful villages gradually merging into one another. Residents do not want the character of our villages to be lost forever and for ongoing encroachment on the countryside. Furthermore the GBC’s Green Belt & Countryside Report does not address the Garlick’s Arch site, so there is no evidence base to support inclusion of this proposed development.

It is hard to feel faith in a system that picks Garlick’s Arch in preference to the existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development. In general insufficient attention has been given to brownfield sites and I urge the Council to think again.

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

Attached documents:
The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of “About Guildford” (published by the Council) on page 5 states that ”... the Plan rejects any schemes that would have a detrimental impact on the Green Belt.” This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition, I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.
There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

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

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

I am writing to STRONGLY OBJECT to the proposed changes to Green Belt area.

I am particularly concerned with the over development proposed for the Horsleys, Send, Ripley and the proposals for the Wisley Airfeld.

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

Attached documents:

Comment ID: pslp171/1519  Respondent: 8900609 / Pamela Bowley  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

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

(2) I strongly object to Policy P2 because it seems in order to meet the target, some 57% of new housing will be built on the Green Belt. How can this be justified? As far as the population is concerned, the Green Belt is sacrosanct. Surely, it is undemocratic to impose this policy which will inevitably destroy our beautiful countryside and the the wild life.

(3) I strongly object to the insetting of East Horsley, which is proposed as part of Policy P2.

(4) I again strongly object to the proposed extension of the settlement boundary and, therefore, the removal of the village areas of the Horsleys from the Green Belt (Policy P2).

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

Attached documents:

Comment ID: PSLPP16/16325  Respondent: 8900641 / Caroline Carr  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

I object to any removal of any villages from the green belt

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

Attached documents:

Comment ID: PSLPP16/4248  Respondent: 8900705 / Susan Fuller  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

1. I OBJECT to not protecting the Green Belt (Policy P2)
I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

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

Attached documents:

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Comment ID: PSLPP16/15553  Respondent: 8900737 / Denise Graham  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

Loss of Greenbelt Land: Although I understand there is a need for increased housing nationally, as well as locally, I would have thought that the preservation of the Green Belt outweighed this requirement. If we do not act now to preserve the Green Belt I can see that in time these areas will be swallowed up by increased development into the Greater London area. The Green Belt is essential for preserving the ‘gap’ between Greater London and Surrey. Surely any need for new houses, should first be put onto the numerous Brownfield sites in Guildford itself before any encroachment of the Green Belt is even considered. Other options for development to the west (Onslow Village) and east (Burpham) of the existing town also seem preferable as those areas are not currently in the Green Belt and at least existing infrastructure and transport links to local businesses are already largely in place. To make such an increase in these small villages, would change their character irrevocably for the worse.

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

Attached documents:

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Comment ID: pslp171/1786  Respondent: 8900769 / Andrew Frackiewicz  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

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

The proposed changes to the insetting of East Horsley and West Horsley as well as the movement of the settlement boundaries of the respective villages in unacceptable and against the policy of having a protected Green Belt.

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

Attached documents:

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Comment ID: pslp171/951  Respondent: 8901185 / Annette Baker  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

25% of the new housing proposed in the plan is to be built on land which is currently categorised as green belt. This land was always meant to be kept for future generations to enjoy. To destroy this land is absolutely outrageous.

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

Attached documents:

Comment ID: PSLPP16/4367  Respondent: 8901249 / Michael Gibbs  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

d) Several of the identified sites are on Green Belt land. It is against government and local policy (yours) to build on Green Belt except in extreme circumstances. Delisting the Green Belt status of the village “envelope”, however you define that, is a deceitful way to allow development of land otherwise ineligible for building. No sound reasons have been offered and it seems that the incentive is merely to free up land to circumvent the rules. This policy will cause outrage unless restricted to recognised built-up areas only.

e) Have you exhausted the search for brownfield sites?

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

Attached documents:

Comment ID: PSLPP16/7734  Respondent: 8901441 / Michael J. Apse  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

I wish to object to the Horsleys and Effingham being removed from the Green Belt.

The exceptional circumstances that are required before such action is taken have not been met.

Is considerable doubt over the inflated number of new houses proposed. The SHMA target which has been increased by Guildford BC giving a population number of almost 70% higher than official national estimates for population growth in the Borough.

Guildford BC have taken the view that because Horsley has some facilities and infrastructure and met their criteria in their analysis of villages then it must be suitable for residential development.

Guildford BC have failed to realise that the facilities and infrastructure that exist are barely sufficient to support the local population. Local schools are full, medical facilities stretched, inadequate drainage, car parking at 2 railway stations full, limited parking at shops and with no proposals for any improvements.

The new local Plan proposes at least 533 new houses with a possible further 60 to follow.

This would bring about 1,700-1,800 people to the area and 800-900 cars. There are no proposals to increase or provide facilities to meet this demand.
This would be totally unworkable and destroy the whole nature and character of the area. The loss of the Green Belt would allow this development to happen.

The Green Belt was put in place in 1947 to stop urbanisation and London spreading beyond the suburbs. The new Local plan together with development proposals from adjoining areas in an easterly direction will create such a situation and seriously damage the lungs of London.

The removal of Green Belt status from the various villages particularly Horsley and Effingham should not be allowed to happen.

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

Attached documents:

Comment ID: PSLPP16/4110  Respondent: 8901633 / Duncan Gray  Agent:

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

1. POLICY P2

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and
the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

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

**Attached documents:**

**Comment ID:** PSLPP16/359  **Respondent:** 8901729 / Justin Underwood  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

green Belt, policy 8, surrey Hills AONB
I am opposed to you removing the green belt in east and west Horsley. Guildford Borough Economic Strategy 2013-31 doesn’t make any case for siting large numbers of homes in west and east Horsley

And generally

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

**Attached documents:**

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<tr>
<th>Comment ID: PSLPP16/1625</th>
<th>Respondent: 8901729 / Justin Underwood</th>
<th>Agent:</th>
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<th>Comment ID: PSLPP16/4086</th>
<th>Respondent: 8901761 / Michael and Ceril Brooke</th>
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| • I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land.  
• I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt. |
| **What changes (2016)/further amendments (2017) do you suggest should be made to the document?** |
| **Attached documents:** |

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<tr>
<th>Comment ID: PSLPP16/7998</th>
<th>Respondent: 8901825 / Raymond Woolfson</th>
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<td>13. P2 - Legal basis for its plans to build on Green Belt land, nor explained why only Green Belt land selected.</td>
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Objections to Guildford Borough Council Proposed Submission Local Plan

I am disappointed that my comments and criticisms submitted in response to the Consultation on the 2013 draft Local Plan, and reflected in many thousands of other responses have not been taken into account.

I am also disappointed in the fundamental flaw in the Proposed Local Plan, that the infrastructure in the Borough is already hopelessly inadequate and will be made impossibly worse by a 25% increase in the population with the attendant increase in traffic.

I object to the draft Local Plan for the following key reasons:

• I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored

• I object to the removal of The Former Wisley Airfield from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

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

Attached documents:

Comment ID: PSLPP171/2082  Respondent: 8902337 / Stephen Drury  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

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

1. The NPPF is clear concerning the policy regarding proposed construction on land which is in the green belt. This states that there should not be such construction save in exceptional circumstances. GBC appears to think that they can get round this restriction by the policy of so-called "insetting" of the villages, in order to, so they say, create "definable greenbelt boundaries". This is a transparently cynical ploy to enable development to take place in areas which are currently on green belt land, ie outside existing settlement areas, and on which current planning policy would forbid development. There is no need for the creation of further so-called "definable" greenbelt boundaries. The planning officers of GBC and its residents know perfectly well where such boundaries are already.

2. Despite the weight of objections to the previous versions of the plan, and despite, in particular, the concerns expressed over the assumptions on which the future housing demand numbers were based, there appears to have been essentially no material changes to the plan from that which was originally proposed in 2013.

3. Taken as a whole, the overall impression is of a plan that has not been sufficiently scrutinised or questioned in its key conclusions . Too much has been left to the discretion of outside consultants having little apparent appreciation of the character of the areas involved. This goes not only to the housing demand numbers study but also to the assumptions and seemingly quite arbitrary statements (eg on what constitutes 'openness') on which the sites strategy document was based, which came from a study done by an outside consultancy firm, Pegasus:
the original conclusions of which have not been materially changed since the original draft plan. I would have expected a democratically elected body to have exercised a rather more rigorous approach to such matters rather than, as appears to be the case, to have outsourced such key responsibilities and decisions in the way it has done.

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

Attached documents:

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<tr>
<th>Comment ID:</th>
<th>PSLPP16/8151</th>
<th>Respondent:</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY P2 (GREEN BELT):

- No declaration of support for protecting the Guildford Green Belt, contrary to NPPF and government statements.
- No evaluation of value of local Green Belt as a public and private asset: it’s just treated as potential building land with a few inconvenient restrictions.
- Impact of Green Belt development on local agriculture ignored.
- Impact on rural leisure and tourism ignored.
- Impact on flood control ignored.
- Impact on carbon sink and knock-on effects for air pollution and climate change ignored.
- Impact on biodiversity ignored.
- Impact on natural heritage ignored.
- Impact on water catchment ignored.
- Impact on room for public space amenities (parks, cemeteries, waste facilities etc) ignored.
- Impact on rural business (e.g. mineral mining, film making) ignored.
- Impact on natural landmarks and views ignored.
- Harm to public health and wellbeing (physical, psychological) ignored.
- Allows excessive levels of development in breach of views expressed in last consultation and Conservative Party manifesto commitments at the last local elections.
- Has allowed ruling Councillors to argue that there is an acceptable percentage of Green Belt that should be sacrificed to development, when no such rule exists in the NPPF.
- Ignores alternative approaches, such as fair burden-sharing under which settlements would undertake to accommodate new development in proportion to their size.
- Disproportionate amount of development (most of it, in fact) to be in Green Belt.

Too few new homes in urban areas where most people (especially the young and less privileged) want to live. This will act against much needed urban regeneration.

- “Insetting” of most villages disproportionate and unjustified in terms of their contribution under the NPPF to the purposes of the Green Belt. Based on flawed Green Belt and Countryside Study. Idea that most Guildford villages do not contribute to “openness” is subjective.
- Major settlement extensions allow indiscriminate housebuilding, as irregularly shaped villages are squared off to enclose green fields.
- Overall harm to Guildford Green Belt unjustified by any objective development need post-Brexit.
- Ignores most of NPPF 17 stipulations.
GREEN BELT

I despair at the future plans for Guildford. At all costs the Green Belt surrounding Guildford should be preserved and in particular the green Belt west of Guildford including the Hogs Back. This would provide a breathing space for west Guildford residents. I understood that the Green Belt was initiated to prevent the spread of urbanisation in the Home Counties and to provide recreation and clean air for all residents. To spoil this would be an act of vandalism.

The classification into Green and Blue Infrastructure should not be used as a vehicle to infringe on the Green Belt. Green Belt is 100% sacrosanct.

The Green Belt should be preserved. Once land is used for residential or business purposes it lost to community for ever. I understood that the Green Belt was initiated to prevent the spread of urbanisation in the Home Counties and to provide recreation and clean air for all residents. To spoil this heritage would be vandalism.

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

Attached documents:

Comment ID: PSLPP16/16946  Respondent: 8902689 / Lyndell Mussell  Agent:

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

GREEN BELT

I object to the plan to remove our local villages (including Effingham, East Horsley and West Horsley) and the Former Wisley Airfield from the Green Belt.

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

Attached documents:

Comment ID: PSLPP16/3683  Respondent: 8902721 / Virginia Poole  Agent:

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

1. I object to the plan to remove our local villages (including Effingham, East Horsley and West Horsley) and the Former Wisley Airfield from the Green Belt.

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

Attached documents:

Comment ID: pslp171/2161  Respondent: 8902721 / Virginia Poole  Agent:

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

I am writing to confirm my continued objection to the GBC draft Local Plan.

I understand that it is still proposed that over half the new housing in the the Local Plan is to be on land which is at present Green Belt. I object to this.
I also object to plans to get round the Green Belt restrictions by adjusting the Green Belt boundaries.

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

Attached documents:

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**Comment ID:** PSLPP16/14028  **Respondent:** 8903169 / Andrew Hooks  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

Removing the Horsleys from the Green Belt is fundamentally unjustified and contrary to the stated Government policy (see Hansard ref. Queen’s Speech, 5th June 2014). GBC’s need to find space for housing does not constitute an “exceptional circumstance” that could in principle otherwise justify the deletion of the Green Belt designation. Removing the village(s) from the Green Belt will lead to further urban sprawl and the unique character and community of East and West Horsley, as well as that of much of the surrounding countryside, will be lost forever to future generations. It is furthermore key to note that the National Trust aspire to pursue the further northward extension of the current Surrey Hills AONB to cover this area, which provides recognition at the most significant level of the importance of the rural nature of this region.

the removal of the Horsleys from the Green Belt, and the implications of such for future generations

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

Attached documents:

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**Comment ID:** PSLPP16/18520  **Respondent:** 8903265 / Susan Anderson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional
circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should be carried out with care and consideration.

The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brownfield sites.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.
Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

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

**Attached documents:**

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**Comment ID:** PSLPP16/11836  **Respondent:** 8903841 / Anne Tutt  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

The Green Belt was set up specifically to protect our environment from development and there are no current exceptional circumstances that would give just cause to alter the Green Belt boundaries or its provisions. On no account should any existing areas be removed from the Green Belt.

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

**Attached documents:**

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**Comment ID:** PSLPP16/15014  **Respondent:** 8904129 / Elizabeth Ross  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

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This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

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nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of “About Guildford” (published by the Council) on page 5 states that “… the Plan rejects any schemes that would have a detrimental impact on the Green Belt.” This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

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There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

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

**Attached documents:**

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**Comment ID:** PSLPP16/1456  **Respondent:** 8904161 / Geoffrey & Lesley Tregaskes  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

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

Attached documents:

Comment ID: PSLPP16/3678  Respondent: 8904161 / Geoffrey & Lesley Tregaskes  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

The Plan asserts "We will continue to protect the Metropolitan Green Belt ". However, the appendix in the Plan shows that around 65% of the proposed developments are on land currently within the Metropolitan Green Belt. There I s ample brownfield land in the urban areas which needs to be regenerated, without the need to eAssessed Housing Needncroach on protected Green Belt land. An election manifesto promised to "Protect the Green Belt" has been ignored by some elected councillors. Policy P3 para 4.3.28, needs to be carefully worded to show that Ash and Tongham greenfield sites are not obtaining preference over Green Belt and AONB areas.

Returning overnight from business trips in some skyscraper jungles of Asia and US it is wonderful to be welcomed back in the local Green Belt so close to Our forefathers had the wisdom to preserve these as lungs for us all, and a small number of temporary councillors should not be allowed to destroy these for ever. We were privileged to raise our family in 16 acres of Ockham Green Belt protecting its wild life and greenery for 35 years, only for GBC to authorise the subsequent destruction of an 1877 property now lost for ever.

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

Attached documents:

Comment ID: PSLPP16/4182  Respondent: 8904673 / Colin Burnside  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

1. POLICY P2

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage.
The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.
There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

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

Attached documents:

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Comment ID: PSLPP16/563  
Respondent: 8904705 / Jonathan and Rosalyn Groocock  
Agent:

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

I am writing to you in regards to the Guildford Borough Council New Local Plan. I have read through the proposals and feel that it is of great importance that I express my great concern on the direction of local policy were it to be implemented.

By way of background we moved here from London almost three years ago specifically because of the green spaces and character of the villages in Guildford Borough. The fact that we have beautiful commons, woods, and green agricultural fields all around these villages is all due to the Green Belt policy and previous Council’s upholding of this policy.

As such we are vehemently against the removal of Green Belt status for any of the villages, and proposals to remove Green Belt status any countryside outside of village boundaries. The entire point of Green Belt status is that it prevents urban sprawl, safeguards the countryside, and preserves the character of the villages. If the proposals go ahead to remove the Green Belt status of the villages then it is certain that over the coming decades we will lose the wonderful country feel that Surrey imbues. But just as significantly the Council will have effectively undermined its own ability to control development in the future, weakening your position entirely.

For us the big issue is the removal of Green Belt status for the villages. This is a red line issue that the Council and MPs alike must stand up for given overwhelming public opposition. We voters are making ourselves expressly clear on this, and as such it is your duty to reflect these both in planning policy and also to Central Government. I hope you will carry out this duty with a sense of purpose and with a clear mandate from the local population – don’t touch the Green Belt!

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

Attached documents:

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Comment ID: PSLPP16/7472  
Respondent: 8904737 / Nigel Scales  
Agent:

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

I strongly OBJECT to the GBC’s planning proposal for Shalford for the following reasons:

# If the expressed views of local residents to protect the area behind Shalford Village Hall are to be supported by the GBC, then the current green belt boundary should at all costs be
retained and kept outside of the permitted development area. There is no valid reason to change the boundaries that have been there for a very long time.

# The land contributes to the pleasant aspect of the village and the well used facilities it provides for the community.

# This proposal has united the community and over 700 residents signed a petition last year to object to the boundary changes, the local clubs and activities giving their support to the objections.

# The fields are on the highest point of the local area, being 32 feet above King’s Road, and any housing development would tower over the surrounding area and village facilities and completely destroy the character of the village.

# Access to any development on this land is via Chinthurst Lane which is already so congested and would be unacceptable for a country lane.

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

Attached documents:

Comment ID: PSLPP16/15196  Respondent: 8905409 / Chris Carter  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

Please let me vote against the insetting i.e. Removing of Chilworth from the green belt for the following reason, After having paid a premium for my property due to the fact it is in the protected green belt area removing the village would adversely affect the price and quality of life.

The current planning system is flawed as adding more homes without upgrading the infrastructure only leads to problems with traffic/schools/doctors/ etc

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

Attached documents:

Comment ID: PSLPP16/15065  Respondent: 8905537 / Christopher Ross  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.
The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the Plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of “About Guildford” (published by the Council) on page 5 states that “... the Plan rejects any schemes that would have a detrimental impact on the Green Belt.” This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt.
There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: PSLPP16/15088  Respondent: 8905537 / Christopher Ross  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.**

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. **The plan says that “allocating these sites does not grant planning permission for development.”** However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as III as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as III as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
Comment ID: PSLPP16/4629  Respondent: 8906113 / Sally Clarke  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Proposed Submission Local Plan: Strategies and Sites June 2016

I am writing to you because I am very concerned about the proposals in the Guildford Plan.

First of all, I am concerned that land is being removed from the Greenbelt in East Horsley and West Horsley. I always understood that the purpose of the Greenbelt was to protect our countryside and to prevent the spread of development into the countryside. I cannot see that sufficient reason or “exceptional circumstances” have been shown to change the Greenbelt designation in this area. The proposed development would drastically change the character of East Horsley and West Horsley for the worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3671  Respondent: 8906177 / Peter & Robyn Cormack  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Re Draft Guildford Local Plan 2016 - Responses

This plan is not materially different from the 2014 Draft Plan, to which I objected, and therefore I object again.

- I object to building on the Green Belt. Last century planners had the foresight to create a green belt area for its openness and as a necessary “lung” for cities and towns and we have all been privileged to be the beneficiaries of that precious vision. That vision is even more relevant today than it was then, keeping the air cleaner and “greener” for all. I refer to National Planning Policy Framework paragraph 79.

- I object to the changes to Green Belt boundaries, as being unjustified by any special circumstances. All the Green Belt sites meet the five purposes of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14991  Respondent: 8906273 / G Baptist  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to not protecting the Green Belt (Policy P2)
This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

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Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Respondent: 8906273 / G Baptist</th>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9636  Respondent: 8906305 / Anne Fort  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages, as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt, once taken the green belt, is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

 Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPP16/3653  Respondent: 8907009 / R D Frayne  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

REMOVAL OF AREAS FROM THE GREEN BELT

The Green Belt was granted to areas to prevent urban sprawl, prevent widespread development, further air pollution and flooding whilst providing areas of relaxation for those who live in the cities. The proposed Local Plan allows for large numbers of new homes and other facilities to be developed in Green Belt areas. The National Planning Policy Framework states that such a development requires exceptional circumstances but the Local Plan does not disclose such needs. Erosion of the Green Belt as set out in the Local Plan will lead to further urbanisation in the future thus adding even further to the development already proposed.

No changes to the Green Belt should be made unless there are exceptional circumstances.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/8625</th>
<th>Respondent: 8907137 / Jennifer A. Milligan</th>
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</table>

I object to the erosion of the Green Belt (Policy P2)  I object to the removal of Ripley and neighbouring villages from the Green Belt. This Green Belt is here to separate urban areas. I am very concerned that all our villages with their separate identities will be lost and form one housing sprawl from outer London to Guildford. We need to keep our Green Belt.  **I strongly object to the former Wisley Airfield site (A35), Garlick’s Arch (policy A43) and Gosden Hill Farm (policy A25)** being removed from the Green Belt to free up land for 2,500 + houses each side of Ripley village and along the A.3 in Burpham. The planning application for over 2,000 houses at Three Farm Meadows/former Wisley Airfield was rejected at a planning meeting unanimously by the committee yet it was still included in the Local Plan, why? As we all know, there is no way the infrastructure can support this level of development. The A3 is congested now and the lanes surrounding the site in Ockham are not suitable for the extra traffic. Please remove Wisley Airfield Site (A35) from your Local Plan. It will completely overshadow and destroy the small rural village of Ockham that has tremendous historic value – William of Occam, listed houses, an estate village, narrow lanes – I could go on and on. My family have been connected with Ockham since the early 1900’s and farmed there – losing their home for Wisley Airfield during the war. It should have been returned to farmland after the war as promised. This large new settlement will dwarf Ockham and be a blot on the landscape from the Surrey Hills. It cannot work with our road system as it is and there is no way the roads can be improved to accommodate the extra cars from over 2,000 houses.

I object to the air pollution that will be caused if you go ahead with the development of Wisley. The RHS is across the A.3 from the former Wisley Airfield/3 Meadows Farm.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/8628</th>
<th>Respondent: 8907137 / Jennifer A. Milligan</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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</tbody>
</table>

I feel very concerned about this Local Plan. Why are we pulling people into an overcrowded area and why are you destroying our Green Belt and joining up our villages into an urban sprawl?

Please take note of all the letters you will receive and understand that our Green Belt is very valuable and not to be given away lightly. It is there for a reason that is still valid. Please use up brown field sites first and unlock empty properties that are not occupied. The villages of Clandon, Send, Ripley, Ockham and the Horsleys are very special and need preserving from over-development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
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<tr>
<th>Comment ID: pslp171/1686</th>
<th>Respondent: 8907137 / Jennifer A. Milligan</th>
<th>Agent:</th>
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</table>

I object to the extension of site A35 Three Farms Meadows and its proposed removal from the Green Belt as it is Metropolitan Green Belt and surrounded by countryside.
<table>
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<tr>
<th>Comment ID: PSLPP16/9536</th>
<th>Respondent: 8907393 / Helen Cannon</th>
<th>Agent:</th>
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<tbody>
<tr>
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<tr>
<td>I object to the removal of villages from the Green Belt.</td>
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<th>Comment ID: pslp171/576</th>
<th>Respondent: 8907425 / Julia Wood</th>
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<tr>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<tr>
<td>I object to the unfair imbalance of the Plan across the borough.</td>
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<tr>
<td>With the removal of site A46 from the Plan (with its proposed 1100 houses) and reductions of housing planned in this version of the Plan in other parts of the borough the Plan has become even more biased against the North East of the borough. Guildford Borough is over 100 square miles. Of the 11350 homes proposed in the Plan, 40.6% (4613) are within 3 miles of Send Marsh, most of them on Green Belt. This is grossly unfair on an already overcrowded part of the borough.</td>
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<tr>
<td>I object removing Send Business Park from the Green Belt (4.3.15).</td>
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<tr>
<td>Send Business Park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for it’s insetting (removal) from the Green Belt, and indeed GBC have not even attempted one. Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.</td>
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<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<th>Comment ID: PSLPP16/13807</th>
<th>Respondent: 8907457 / Russell Hills</th>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<tr>
<td>I am writing to object to the plans for taking Horsley out of the green belt and also to the proposed housing developments in the area.</td>
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<tr>
<td>I am shocked by the scale and the density of housing of which you propose it being completely out of keeping and scale with the rest of the village.</td>
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</table>
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13811  Respondent: 8907457 / Russell Hills  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Apparently there are alternative sites along the A246 to build homes rather than building on top quality greenbelt and ruining villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5805  Respondent: 89077713 / S.J. Gilbert  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. The Green Belt was set up to stop urban sprawl, reduce flooding and to give lungs to both the countryside and towns. We need these open areas for survival of all species – plant and animal, humans included.

Removing villages in Surrey from the Green Belt could be far-reaching and ultimately result in the loss of lovely individual historic Surrey villages. Along with historic villages this part of Surrey contains many areas of Outstanding Natural Beauty and Sites of Special Scientific Interest which are protected by the Green Belt and should not become islands in urban areas. We already have suburbia reaching as far as the M25 and your plans seem likely to open the doors to eventually extending it all over the rural areas of this part of Surrey and the Surrey Hills, Major destruction of the Green Belt to the East of Guildford is not justified by minor extension elsewhere. I do not understand why you should destroy it to the East of Guildford whilst at the same time extending the green belt in the Ash and Tongham areas which are situated further from London and beyond Guildford and do not contribute to Metropolitan Sprawl. Also at the same time Wisley Airfield is considered likely to be appropriate for development at some time. WHY?

Residents in East and West Horsley have contributed to the Green Belt and rural appearance in our villages by helping to purchase land like Wellington Meadow and two areas of woodlands so as to maintain the rural feel of the villages. In addition farmers and residents have purchased land on Ockham Road North for the same reason.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16665  Respondent: 89077713 / S.J. Gilbert  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Green Belt was set up to stop urban sprawl, reduce flooding and to give lungs to both the countryside and towns. We need these open areas for survival of all species – plant and animal, humans included.
Removing villages in Surrey from the Green Belt could be far-reaching and ultimately result in the loss of lovely individual historic Surrey villages. Along with historic villages this part of Surrey contains many areas of Outstanding Natural Beauty and Sites of Special Scientific Interest which are protected by the Green Belt and should not become islands in urban areas. We already have suburbia reaching as far as the M25 and your plans seem likely to open the doors to eventually extending it all over the rural areas of this part of Surrey and the Surrey Hills. **Major destruction of the Green Belt to the East of Guildford is not justified by minor extension elsewhere.** I do not understand why you should destroy it to the East of Guildford whilst at the same time extending the green belt in the Ash and Tongham areas which are situated further from London and beyond Guildford and do not contribute to Metropolitan Sprawl. Also at the same time Wisley Airfield is considered likely to be appropriate for development at some time. **WHY?**

Residents in East and West Horsley have contributed to the Green Belt and rural appearance in our villages by helping to purchase land like Wellington Meadow and two areas of woodlands so as to maintain the rural feel of the villages. In addition farmers and residents have purchased land on Ockham Road North for the same reason.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13823  Respondent: 8907809 / Sarah White  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing to object to the proposal to take the Horsleys out of the Green Belt and to build on land around the Horsleys and surrounding area. I believe that there should not even be a discussion on this; the Green Belt was created for a reason and should be considered sacrosanct. People move to this area for the peace and quiet of the countryside and any significant construction should take place on Brown field sites. If building on the Green Belt is allowed to go ahead a precedent will be set and our country’s beautiful countryside will eventually cease to exist. The unethical/immoral back door methods of extending village boundaries and taking villages out of the green belt is a blatant attempt to get around the building rules. Rather than constantly building without thinking, the problem of housing should be tackled by looking at the core issues that have caused the need to expand out of London; the many properties owned by foreign investors that stand empty from one year to the next, the problem of immigration, basing everything around London (as I believe Princess Anne suggested, if only a few new houses were built in every village in the UK it would solve the housing problem. But there is a fixation with London!!) etc.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4653  Respondent: 8907905 / G.A. Phillips  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

2. **I OBJECT to not protecting the Green Belt**

I object to the proposals to remove the villages of Send, Ripley and Glandon from the Green Belt together with the sites of Wisley Airfield and Garicks Arch.

National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered or the development of the Green Belt.
There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. This is something that villagers from each village do not want to happen.

(Instead of developing Garicks Arch and Send Hill, there is a "brownfield" site just to the south of the Burnt Common roundabout with surplus land that could accommodate a further development)

In your recent free newspaper "About Guildford", you state that the Green Belt must be saved and to use all "brownfield" sites for development. So why doesn't the council abide by its own statements?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1276  Respondent: 8908737 / Rosemary Goodrick-Meech  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Guildford Borough Proposed Submission Local Plan June 2017 Consultation

I write regarding the above proposal. Although there has been a reduction in the number of new homes to be built on the Green Belt, it still is not enough.

I strongly object to no changes being proposed since the 2016 consultation to insetting West and East Horsley from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/998  Respondent: 8909185 / Jamie Hogg  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

• I object to the erosion of the Green Belt
• I object to any ‘In -Setting’ of any villages from the Green Belt. Insufficient investment is being made to make this sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/104  Respondent: 8909185 / Jamie Hogg  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Green Belt, Policy 2 at paragraph 4.3.15
I object to the proposal to inset Send Business Park from the Green Belt because:

- It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation
- There is highly restricted vehicular access along Tannery Lane in both directions
- Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriat

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14772  Respondent: 8909313 / Andrew Fairley  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Green Belt

The National Planning Policy Framework states that the Government attaches great importance to the Green Belts; the fundamental aim of which is to prevent urban sprawl by keeping land permanently open. I strongly object to the changes to the Green Belt which are proposed and specifically to the exclusion from the Green Belt of the former Wisley airfield site and ‘insetting’ of East Horsley, West Horsley and Effingham villages.

I find the arguments proposed in 4.3.12, 4.3.14 & 4.3.16 of the Local Plan to be unsound. I cannot see any justification for the former Wisley airfield site to be excluded from the Green Belt and I consider the ‘insetting’ of East Horsley, West Horsley and Effingham villages to be unacceptable. I consider both these proposals to be against the National Planning Policy Framework which states “once established Green Belt boundaries should only be altered in exceptional circumstances”. The status quo for East Horsley, West Horsley and Effingham villages should continue to lie within the existing Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1739  Respondent: 8909313 / Andrew Fairley  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I disagree with the statement “The Metropolitan Green Belt will continue to be protected, as shown designated on the proposals”, given the changes to the Green Belt which are proposed. I firmly believe East Horsley, West Horsley and Wisley Airfield should continue to lie within the existing Green Belt.

The NPPF states that the Government attaches great importance to the Green Belts; the fundamental aim of which is to prevent urban sprawl by keeping land permanently open - “once established Green Belt boundaries should only be altered in exceptional circumstances”. The status quo for West Horsley and East Horsley is that they currently are in the Green Belt. Ministerial Guidance on the Green Belt makes it clear that legally unmet housing need alone is unlikely to qualify as “exceptional circumstances”. I firmly believe the former Wisley airfield site and East Horsley, West Horsley and Effingham villages should continue to lie within the existing Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Policy P2 of the Local Plan clearly states “We will continue to be protected the Metropolitan Green Belt, as shown designated on the proposals Policies Map, against inappropriate development. In accordance with national planning policy, the construction of new development will be considered inappropriate and will not be permitted unless very special circumstances can be demonstrated.” The Local Plan’s proposal to include the Former Wisley Airfield as a potential development site is completely contrary to this statement and I object to such a large scale expansion into the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites.
than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of “About Guildford” (published by the Council) on page 5 states that “...the Plan rejects any schemes that would have a detrimental impact on the Green Belt.” This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/12863 | Respondent: 8909985 / Mr D.S. & Mrs J. Humphreys | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
We object

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5847  Respondent: 8910081 / Sheila Sutton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I thought that the Green Belt was fixed, except in exceptional circumstances, and this has not been demonstrated. The number of homes already creates too much strain on the infrastructure in and around the Horsley's.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11204  Respondent: 8910145 / Mr G.W. & Mrs A.C. Spratt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to not protecting the Green Belt (Policy P2)

Our Green Belt is precious. It is what protects London from urban sprawl; it preserves air quality; it prevents flooding; it is the city’s playground. It is for us to conserve and protect it. There are 5 legal purposes for Green Belt, and it meets them all:

- To check the unrestricted sprawl of large built up areas
- To prevent neighbouring towns merging into one another
- To assist in safeguarding the countryside from encroachment
- To preserve the setting and special character of historic towns
- To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

This policy is flawed and should have been amended. In the last consultation just six individuals, out of the c. 7,000 of those who took part in the consultation, supported the policy. Another 20 comments of support were from organisations such as: the University of Surrey, local councils (including Guildford), consultants (e.g. Savills) or landowners. But of the 1,371 who commented on the green belt policy 1,332 (97%) were against.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11214  Respondent: 8910145 / Mr G.W. & Mrs A.C. Spratt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
NO EXCEPTIONAL CIRCUMSTANCES

The local plan proposes nearly 9000 new homes to be built on Green Belt land (compared with ~ 5000 current homes in Guildford, so approx. equal to 18% of the existing homes in the borough) – a huge proportion. The National Planning Policy Framework (NPPF) requires any change of Green Belt boundaries to demonstrate exceptional circumstances. Unmet housing need is NOT an exceptional circumstance in law. No exceptional circumstances have been disclosed. So the Green Belt boundaries should NOT be changed through the plan making process.

BROWNFIELD AVAILABLE

There is brownfield land available in the town centre which is being earmarked for commercial development rather than for housing. This is enough to meet our real needs for affordable local homes. There are enough vacant commercial sites to cope with genuine business need, and we have enough retail capacity already, so urban brownfield/derelict land should be used for housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. The objects, as stated, of the Plan are "to protect the countryside"; yet, the plan proposes to take significant parts of the present countryside out of the Metropolitan Green Belt. This cannot be called "Protection".

1. This removal from the Green Belt is to permit the building of houses on 4 major sites in West Horsley - no Exceptional Circumstances have been put forward for this. The SCHMA is not an Exceptional Circumstance.

3. It is dubious that the nomination of replacement Green Belt in the Ash area complies with the objects of the Metropolitan Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16110  Respondent: 8911617 / Charles Hope  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Altering settlement boundaries by "straightening them up, would appear to allow for further building.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4744  Respondent: 8911745 / F M O' Gorman  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Needless to say the incorrect Green Belt and Countryside Study does not validate any changes or extensions to the currently defined Settlement Area boundaries and as a resident of West Horsley I totally oppose the village's removal from the Green Belt by insetting or extension.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7899  Respondent: 8911777 / Alan Bowley  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Lastly it will mean building on Green Belt land which has protected our village from unsuitable development for many years thus retaining its character.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Respondent: 8913889 / Penny White</th>
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<td>Villages in the greenbelt are greenbelt! Planning for these areas have always been implemented by yourselves with greenbelt rules adhered to, therefore, these villages are still greenbelt. You seem to be trying to build on greenbelt by deceitful means. You, and the government, have been voted in on a mandate of protecting the greenbelt in its entirety. If your mandate is to change then you should do that on your next election campaign.</td>
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<td>I am writing to strongly Object to the 2016 Draft Local Plan.</td>
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<td>I Object to changes in the boundaries and erosion of the green belt particularly in the Send, Send Marsh, Ripley and Clandon area. Removal from the green belt means removal of our villages and urban sprawl along the A3 and encroachment of the countryside</td>
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<td>I have lived in Send Marsh for over thirty years and believe that we need to protect our village status and retain the green belt. There are brown field sites and areas within the village boundaries that can be used for development to meet housing need.</td>
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<td>Please look again at the Local Plan and listen to the views of the residents.</td>
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<th>Comment ID: PSLPP16/5090</th>
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**Policy P2 on page 48**

I object to the Green Belt realignment which will take Send outside the settlement boundary when there are still brownfield sites available for development in urban areas which will have much less impact on local environment and infrastructure. It has never been made clear by GBC why there is a need for such a vast amount of additional housing in the next 20 years for an area which is primarily residential and not industrialised.

I object to the removal of Send from the Green Belt because the village and its countryside provides a necessary buffer between Woking and Guildford.

I am concerned that GBC is not calculating their requirements correctly and is mixing up the temporary student requirements at places such as Surrey University, with that of the needs of the local Guildford population. At no point in the 50 years I have lived in the area, have I experienced a supposed demand for such an enormous amount of homes required. I have not witnessed this demand from local people or companies, so I can only assume that all these homes will be lived in by people who are outside the GBC area and will be shipped in to live and work. If so, I object to this principal.

The number of homes proposed for Send (693p.a.) is completely disproportionate in the context of a village like Send. The extensive development proposed for Send and elsewhere in this locality such as Garlick’s Arch, Gosden Hill and Wisley Airfield means that, in effect, it will become a ribbon development from Guildford almost as far as Cobham and transform a pleasant rural area into suburbia.

The Green Belt policy has always been very clear. It is to stop urban sprawl and prevent joined up developments. This plan seems contrary to this policy and would appear to work in contravention of this.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/5092  **Respondent:** 8914049 / Diana Bridges  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the new boundaries proposed for insetting the villages of Send and Send Marsh/Burnt Common from the Green Belt (policy P2).

The boundaries drawn enclose huge areas of open spaces that should be retained as Green Belt land and not developed at any time in the future. The village boundaries should be much more closely circumscribed to prevent urban sprawl and retain their village identity.

By having such a tightly inset area around the village then the greenbelt will be completely lost forever and urban sprawl will ensue.

With a presumption for development within these ‘inset’ areas, the proposed enclosures would encourage over-development and expansion of the villages in the future and completely ruin their essentially rural nature.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/5093  **Respondent:** 8914049 / Diana Bridges  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Fields around Danesfield, Send Marsh (GU23 6LS)

I refer to this area because it is not currently high profile but it is a significant site for other reasons.

I wish to object to this site although it is not specifically mentioned. However, I understand this site is regarded as ‘safeguarded’ and therefore could come into play should some of the sites drop out.

If you look at the maps then you will see that the far end and sides of Danesfield have had their boundaries inset and now the back gardens of these houses now are the proposed greenbelt boundary. As we are surrounded by open fields then this suggests that everything the otherside, ie open fields, would be redesignated as non greenbelt and therefore will be developed.

My comments on this site are as follows:

1. This site is on a flood plain. Over 37% of the site is in flood zones 2 or 3, with over 25% in flood zone 3. Therefore, this land is clearly not suitable for development and this was borne out whenever there is heavy rain and the land floods. I am reliably informed that the area becomes almost a large lake when there is a heavy downpour and this can be seen from the road and footpaths.
2. GBC policy and the Environment Agency are against developing on flood zones and so for this reason the land should not be built on or developed. GBC could face legal action from the Environment Agency if they were to go against this and spend tax payer’s funds to defend such a claim. This would be an irresponsible use of tax payer’s money.
3. I know photographic evidence showing the effect of flooding on the site have been sent to GBC and they have accordingly downgraded the site from a Potential Development Area to a Safeguarded Area.
4. Any building or hard standing will reduce the land available to absorb the run off from heavy rain falls and this will exaggerate the flooding affect. This could cause flooding and damage to adjoining property in Danesfield which may lead to future insurance claims.
5. There are many bats on this site which are protected under The Conservation of Habits and Species Regulations.
6. The access into the site is limited to only two points of entry. One entry is onto the busy Send Marsh Road which is narrow and unsuitable to carry more traffic. This entry point is near to a blind bend so there would be a safety concern and a potential accident black spot with approaching traffic from the direction of Send. The other entry point is into the side of Danesfield where the access is deliberately narrow as it is a residential road where many families live with young children. There is only just enough room to get two cars passing so a massive increase in traffic would be totally impractical as well as dangerous for all the small children who play in the road. Furthermore, there is an old established oak tree on the entry point which would have to be cut down and I believe this has a TPO on it.
7. As a resident of Send for 50 years, and with my family living here and our garden backing onto this site, I am very concerned about what is being discussed regarding potential building on the site. It would be an absolute travesty if this land were to be lost to building. This corner of Send Marsh is of an open rural nature and therefore totally unsuitable for inserting from the green belt.
8. Our village is loved and cherished by all those of us who live here. Send Marsh has a long history of generations of families living here and we all love the open countryside, the lovely walks, the beautiful views and the village life atmosphere. To commence on such a thoughtless and aggressive building program would bring this to an end and would mean that we could never go back to what we once had.
9. The site should not be termed “safe guarded “as the meaning of ‘safe’ does not seem to apply. As I understand the term as used here, this site could be back on the table as a possible contender for consideration for planning permission if other sites do not get their planning granted. There would not be a democratic process for this site to then have a further round of public consultation as the date will have been passed. We would then be at the mercy of GBC and the planners.
10. Send Marsh has already seen a dramatic increase in the traffic flowing through it and into Send village at peak hours with long tailbacks from the traffic lights at Mays Corner. Send Marsh regularly sees delays getting onto the Portsmouth Road at Send Dip with long queues of traffic going towards Ripley and Burnt Common.
11. This site is at the back of Danesfield has limited access onto Send Marsh Road and if this was the only way out then this would put a lot of strain onto an already congested road. If the access was through Danesfield then this would seriously congest our road as it is very narrow and difficult to pass cars at various points.
12. This site should not be removed “inset” from the green belt as this would mean planning permission would surely be granted for the future.
13. The field behind Danesfield is a beautiful open space with much wildlife including deer and foxes as well as lots of birdlife. The field is enjoyed by those in the village who walk and take their dogs by the adjoining footpaths.

14. Send Marsh Road has a very narrow and dangerous bridge which would need to be widened to make it safer and the whole of the Send Marsh Road would need to be overhauled. There is no mention of this in the plan.

15. Send Marsh does not have any infrastructure. There are no local shops, no school, no doctor’s surgery and no public park area. It comprises if mainly all houses and so the addition of so many new houses will put huge pressure on the infrastructure on Send and Ripley, both of which can hardly cope with the current pressures. You would have to walk a considerable distance to access any of these services and so this would mean owners would have to use a car. This would seem contrary to the governments’ policy for us all being green and reducing pollution.

16. The bus routes to and from both villages are very poor and infrequent, about one per hour. Again it is essential to have a car. The roads are too narrow and dangerous for cyclists so this is not really an option.

17. By proposing greenbelt sites in the area means this land will be gone forever. It is essential we protect the greenbelt or we will simply be a concrete jungle joined to Guildford and Woking with no green space in between. These greenbelt areas are essential to everyday living to provide clean and open space for everyone to enjoy.

18. There are plenty of brownfield sites available which should also be considered. In addition, there are sites which have been given planning permission but builders are refusing to build on as presumably, they are waiting for house prices to increase so they can maximise their profits. I feel time limits should be placed on planning permissions granted to encourage building in any economic climate.

19. Send Marsh is poorly served by schools, particularly the secondary school. It has become increasingly difficult to get children into George Abbot which is the closest school to the village. With the amount of houses to be built set to increase, where will the children go to school if we don’t have a plan to build schools?

I would like to place on record my objections which I would like to be seen by the Inspector.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2562  Respondent: 8914049 / Diana Bridges  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ) , is Sound? ( ) , is Legally Compliant? ( )

I object to removing Send Business Park from the Green Belt (4.3.15). There can be no justification for its removal from the Green Belt, and indeed GBC have not even attempted one. Send Business Park is a very small collection of local businesses in a very rural area in the Green Belt. Therefore no “exceptional circumstances”, as required by the NPPF can be claimed. If further development is made on this Business Park then I would alert you to the same points made earlier for point 1, Clockbarn Nursery site with regard to traffic and pollution issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16117  Respondent: 8914177 / J.V. & H.P. Brown  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ) , is Sound? ( ) , is Legally Compliant? ( )

• I believe that the rationale for building on the green belt requires exceptional circumstances.
- The need for additional housing should not be used by the borough council to justify inappropriate development of the greenbelt when there are alternative options that could be considered. Guildford is currently undergoing its own review and first call should be given to brown field and other developed sites where there is an already established infrastructure to support further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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The Green Belt and Insetting of Village Boundaries

The draft Plan proposes that the Horsleys are both removed from the Green Belt (with other villages) and that the settlement boundaries be extended at the same time. The NPPF requires "exceptional" circumstances for changing the present Green Belt village boundaries but the draft Local Plan provides none to justify changes to existing boundaries. Policy P2 states "We will continue to protect the Metropolitan Green Belt against inappropriate development". This is the opposite of what is being proposed.

The draft Plan would increase housing by 35% in West Horsley by adding some 384 new houses over the period of the Plan. Current housing in West Horsley is at a low density and there is no evidence in the Guildford Borough Economic Strategy 2013-31 document to support the location of such a large number of new houses in the Horsleys or nearby villages. Economic development site proposals are on the other side of the Borough which suggests that the new housing is intended for commuter occupation with attendant pressure on transport links and supporting infrastructure for which there are no specific proposals.

None of the sites allocated for development within West Horsley are appropriate for development because of the adverse impact on the village of each on economic, social and environmental scale grounds.

For these reasons I object to the Local Plan proposals for insetting the Horsley's from the Green Belt and the extension of the village boundaries at the same time.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Policy P2

Even though the government states the Green Belt will be protected, the Plan proposes 89% of all new development will be in the greenbelt. Normandy and Flexford including A46 ‘strategic site’ will be inset, taken out of the greenbelt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The NPPF states ‘no development in Green Belt unless exceptional circumstances can be demonstrated’. The GBC LP does not prove exceptional circumstances when its states that a lack of openness is the reason for 14 villages being removed from being washed over by the Green Belt. Where is the case for them not being open? Prove it and don’t allow poor decision to be made on low grade research. Green Belt is precious and where it exists prevents urban sprawl and villages merging. The case for Normandy and Flexford being merged by implementing Policy 46 has not been made. Natural England and the CPRE have both voiced their concern at the intrusion into the Green Belt and I hope that the GBC listen to guardians of the precious countryside. I would like to invite the GBC Executive to visit the site and see how it fulfils the rules of the Green Belt. I don’t believe that GBC have proven enough reason to remove the Green Belt protection in an area of Surrey whose county council are proud to have been the architects of the concept of the Green belt. GBC have no proved ‘exceptional circumstances’ to roll back Green Belt land that would stand up for real scrutiny.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I am writing to tell you what i think about the Draft Local Plan.

I object to Policy P2 Green Belt.

I do not want you to build on the Green Belt because of these reasons:

1. There shall be more noise
2. Where shall all the animals live?
3. Our gardens shall become flooded regularly

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to all policies that involve building on the Green Belt including Policy P2

In the last local elections, Conservative Councillors made it clear that it was their intention to protect the Green Belt. We have been told that following the last round of consultation in 2014, Guildford Borough Council have listened to the concerns of residents and have made changes in this their updated Draft Local Plan. Despite all this, 65% of the proposed development for the borough is in the Green Belt. Our Green Belt is vital to prevent urban sprawl. While our Council pays lip service to the value of the Green Belt, their plan does little to protect it for future generations. Government statements and the NPFF make it clear that most development in the Green belt is inappropriate and should only be approved in very special circumstances. It has been stated that unmet housing need (including traveller’s sites) does not constitute very special circumstances – it does not justify development in the Green Belt. In order to give the impression that they are not building on Green Belt land, Guildford Borough Council intend removing villages from the Green Belt and placing a hugely disproportionate amount of housing here. This is extremely damaging to the character and heritage of these villages most of which do not have the required infrastructure to support housing development on this scale.

The new mayor of London, Sadiq Khan, has told London planners not to approve development on Green Belt Land within the M25. We cannot continue to build on our countryside – creeping development has led to almost continuous housing from Central London to Effingham Village. This Draft Local Plan would allow this to extend all the way to Guildford Town Centre.

Once the land in the current Green Belt is developed we have allowed a damaging and irreversible change to take place and it is our collective social responsibility to ensure that this does not happen. All 16 villages should remain part of the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
Against this background, OPC **OBJECTS** to the Local Plan overall on the following grounds:

1. The Local Plan proposes major, unjustified and unacceptable erosion of, and removal of villages or major parts thereof from, the Green Belt.
2. Over 70% of new housing is proposed to be built within the existing Green Belt notwithstanding that there is more than enough genuinely brownfield land and non-Green Belt land available.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attended documents:

| Comment ID: PSLPP16/7740 | Respondent: 8916001 / Ockham Parish Council (Peter Bevan) | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| 3. The Local Plan proposes major, unjustified and unacceptable erosion of, and removal of villages or major parts thereof from, the Green Belt. |
| 4. Over 70% of new housing is proposed to be built within the existing Green Belt notwithstanding that there is more than enough genuinely brownfield land and non-Green Belt land available. |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |

| Comment ID: PSLPP16/4561 | Respondent: 8916353 / John Franklin | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| 2. From all the comments in 2014 there should have been a totally different thrust, instead of using Green Belt and Green Field land over the next 10+ years the strategy should be based on using Brown Field sites and air space above existing single storey sites. |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |

| Comment ID: PSLPP16/4562 | Respondent: 8916353 / John Franklin | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
4 So I object to the strategy and details within the 2016 GBC Draft Local Plan. I object to any changes to the Green Belt, to any building in the Green Belt, I object to any villages being taken out of the Green Belt. I object to East and West Horsley being taken out of the Green Belt.

5 I object to any changes to the Parish Boundaries of East And West Horsley, to any addition to the Parish Boundaries to incorporate any existing Green Field site. Each prospective change creates a new boundary, onto which further additions can then be planned in 5 or 10 years time. A slippery slope and a setting of dangerous precedents. An unacceptable strategy. I object to Green Fields use.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/13334  **Respondent:** 8917025 / Fiona Cheese  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

I object to this Plan which proposes that over 70 per cent of new housing be built within the Protected Green Belt. There is ample brownfield land in Urban areas without using precious protected Green Belt Land and destroying historic rural villages and agricultural land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/16574  **Respondent:** 8917377 / Nick and Fiona Hardman  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

We are writing to object most strongly to Guildford Borough Council’s local plan for housing and development. As residents of East Horsley we are deeply concerned by the proposals, which will have a profoundly damaging effect on the character of the village, and will stretch the local services to beyond breaking point. There are a number of key points which we object to:

1. The proposal to remove the Horsleys from the Green Belt: The National Planning Policy Framework states that “The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belt are their openness and their permanence”. It states that “Once established, Green Belt boundaries should only be altered in exceptional circumstances”. It also states that “If it is necessary to prevent development in a village primarily because of the important contribuiton which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt”.

By looking to remove the Horsleys from existing, well established Green Belt land, GBC will destroy the openness inherent in the planning and building within the settlement boundary. The Horsleys have been developed with a rural, open “feel” and this is a key part of the character of the villages, in keeping with their position within the Green Belt. Their situation within the Green Belt has ensured that development meets strict criteria and this enhances this outstandingly beautiful area. The changes proposed by GBC will destroy this openness permanently and GBC have in no way demonstrated ‘exceptional circumstance’ in order to justify this.
2. The proposal looks to extend the settlement boundaries of the Horsleys. This would encroach on Green Belt land, and there is no justification for this, other than to increase the land available within the settlement for housing development. Again, this goes totally against the principles of Green Belt planning and GBC have shown no evidence that justifies this proposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Removal from the Green Belt of homes in Guilford Road, northern end of Glaziers Lane, Flexford, Walden Cottages & Palm House Nurseries traveller site.

I object to placing these homes outside the green belt as this could enable high density development within these areas which would offer greater success for planning applications. Additional building in these areas would destroy the openness of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I OBJECT TO ALL POLICIES INVOLVING BUILDING IN THE GREEN BELT and also object to all proposals to remove East and West Horsley from the Green Belt – this would severely damage the very special nature and character of these villages and remove a vital amenity enjoyed by both the London and local population. The importance of our Green Belt as a public and private asset in terms of tourism, leisure, agriculture and heritage have been overlooked. There is no justification to extend the defined East and West Horsley Settlement Boundaries. The Green Belt serves a vital role in providing clean air and combating pollution and has greater importance and value today than when it was first conceived. The deliberate protection of rural villages from the expansion of Greater London and surrounding towns goes beyond the convenience of developing new homes on greenfield sites. Our local council has an obligation to consider and exhaust all other exiting development opportunities such as redevelopment of brownfield sites (such as those owned by the University of Surrey), sites already allocated for development (but not yet developed) and should be striving to protect the Green Belt and the historic integrity of local villages. Our Green Belt meets all five legal purposes for Green Belt designation:

- To check the unrestricted sprawl of large built up areas
- To prevent neighbouring towns merging into one another
- To assist in safeguarding the countryside from encroachment
- To preserve the setting and special character of historic towns
- To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

The Council should look to encourage re-use of derelict sites and for the consolidation of commercial businesses to allow for re-zoning existing commercial or light industrial sites for residential use. The Council has ignored the impact of Green Belt development on flood control and on carbon sink. It has also failed to address the knock-on effects for air pollution and climate change.

The Green Belt provides an irreplaceable habitat for Britain’s declining wildlife which no amount of “newt tunnels” and “bat boxes” can replace. Our native bee population is already in decline and the Local Plan fails to address the impact on biodiversity, wildlife and our natural heritage.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

1. POLICY P2

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and
should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is
gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of
future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly
protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public
consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the
borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage.
The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken
out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to
justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national
guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional
circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be
taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances
required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have
answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing
exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from
the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should
be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green
Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and
nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites
than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped
land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan
rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider
this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and
the consultation period restarted after the correction has been given the same distribution as the original statement. (I
assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that
the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of
these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that
infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It
is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing
development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the
NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored.
Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems
almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the
Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I
cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13531  Respondent: 8919393 / Steve and Angela Gill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following reasons:

1) I object to the Council over-riding the protection and rights afforded to villages and land in the Green Belt and which proposes that over 70% of new housing be built within the Green Belt. There is sufficient brownfield land in the urban areas which needs to be regenerated and that can provide housing where people want and need it, without the need to encroach on protected Green Belt land. The fundamental reasoning supporting the existence of the Green Belt Election are being ignored and manifesto promises to the electorate reneged upon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3525  Respondent: 8919521 / Susan Hughes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY P2 – Green Belt OBJECT. I object to the proposal to inset East Horsley within the Green Belt. The Green Belt was originally designated to protect areas of largely undeveloped, wild, or agricultural land surrounding or neighbouring urban areas. East Horsley is still a rural village reached by rural lanes (not roads). There are many woodlands, large gardens and open spaces in the village which contribute to biodiversity and reinforce the ideals behind the idea of the Green Belt. I also object to the proposed boundary changes for the village and the removal of Wisley Airfield from the Green Belt on the pretext of meeting the Council's "unfulfilled housing need" - this is not an "exceptional circumstance".

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17835  Respondent: 8920129 / Allan Siva  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I do not agree with the scale of the house building programme which is being proposed by Guildford Borough Council ("GBC"). The target outlined represents a 25% increase in the housing stock of the borough, whilst we note that the Office of National Statistics ("ONS") projects a population increase of some 15% for Guildford Borough over this same period.

The Proposed Submission Local Plan includes the statement "We will continue to protect the Metropolitan Green Belt" a policy which I fully support. However, the Local Plan then proposes to re-define the Metropolitan Green Belt and seeks to inset a number of the villages, including East Horsley. The housing policies set out in the Proposed Submission Local Plan will result in some 65% of developments being made on land that is currently Green Belt. The irony of the statement does not fool anybody and it is tactics such as these that bring politics into disrepute.

I am also concerned that the infrastructure proposals are wholly inadequate to meet the needs of the proposed developments in the Local Plan, in particular the proposed developments in East Horsley and at the Wisley Airfield site. Since almost all of the occupants are unlikely to find work locally they will need to travel further afield to London or Guildford for their jobs. Roads such as Ockham Road North and Ockham Road South, with their pinch points, are already struggling to cope with the existing traffic let alone an additional, say, 2000 households travelling to work. Similarly, there are already occasions when the car park at Horsley railway station is full and therefore it is difficult to envisage how the additional commuters from such massive development in the area (as contemplated in the Local Plan) can be accommodated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17838  Respondent: 8920129 / Allan Siva  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Paragraph 4.3.13: Proposal to inset East Horsley from the Green Belt

Policy P2 proposes that East Horsley should be inset from the Green Belt, instead of being ‘washed over’ as it is today. Currently development is permitted within the settlement boundary, although this area is still considered to be Green Belt with a particular planning regime being applicable.
East Horsley is set in a rural location and the village has the look and feel of a rural village. Its Green Belt status has been a key factor in preserving that character. The large amount of woodlands in the village has preserved the rural character and openness of this village. GBC falsely attributes the need to inset East Horsley to NPPF requirements, arguing that the test for remaining ‘washed over’ is that the village should make an important contribution to the openness of the Green Belt. This East Horsley clearly does.

I therefore OBJECT to the proposal to inset East Horsley from the Green Belt and request that this proposal be dropped from the Local Plan.

Paragraph 4.3.16 and Proposals Map: Settlement Boundary changes in East Horsley

There is a proposal to move the East Horsley settlement boundary westwards from behind the houses on the west side of Ockham Road North up to the eastern boundary of Lollesworth Wood. This proposal removes over 5 hectares of agricultural fields from the Green Belt. Under NPPF rules Green Belt boundaries should only be changed in ‘exceptional circumstances’. The exceptional circumstances before taking this action has not been demonstrated, and I do not believe this proposal can be considered as an exceptional circumstance. Clearly the only justification for this change is to bring a large agricultural field within the settlement area in order to provide more housing land. However, under NPPF rules this is not a sufficient justification for changing a Green Belt boundary. Green Belt rules make it clear that unfulfilled housing need is not normally considered to be ‘an exceptional circumstance’.

The NPPF is clear that every movement in settlement boundaries must be justified by ‘exceptional circumstances’ and no valid exceptional circumstances exist. As such it is an invalid proposal.

There is also a proposal to move the East Horsley settlement boundary westwards from behind the houses on the west side of Kingston Avenue which would have the effect of removing all of Kingston Meadows out of the Green Belt. Kingston Meadows is the main public recreational space of East Horsley, comprising various sports facilities and playing fields. I do not believe that this can be considered as an “exceptional circumstance” as provide under the NPPF rules. As such this is also an invalid proposal.

I therefore OBJECT to both these proposed boundary changes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

XI. I object to the calculations used for industrial space which appear to use a far lower ratio than the industry standard resulting in unnecessary land take which has an impact on the use of green belt land.

XII. I object generally to the poor drafting and apparent lack of proof-reading. An example of this is policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” when in fact the figures in the table add up to 9,810. It is impossible for members of the public to understand this kind of error/lack of clarity.

XIII. I object to the fact that a number of policies use words such as “seek” and “request” which would render the policies unenforceable. All of these qualifying words should be replaced without exception with strong verbs such as “require” and “demand”.

XIV. I object to the apparent disregard for the impact of air pollution on residents of the borough and considers that the evidence submitted on air quality is not only woefully inadequate but also misleading.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to not protecting the Green Belt (Policy P2) 

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and...
nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/15587  **Respondent:** 8921409 / Martin Butcher  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The character of the Horsleys will be changed forever by the increasing of the Settlement areas, opening the door to potential developments in the future as yet unknown but made a whole lot easier.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13003  Respondent: 8921569 / Steven Cliff  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the proposals to take Ripley, Send and Clandon out of the Green Belt. I also object to the proposed changes to Green Belt status surrounding Wisley Airfield (A35) and Garlick’s Arch (A43) sites. There are no exceptional circumstances to justify change to the Green Belt boundaries or development on Green Belt land (as required by National Planning Policy).

I note the existence of a brownfield site just to the south of the site at Burnt Common which could be developed instead of using Green Belt land at Garlick’s Arch.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13196  Respondent: 8921857 / Claire Kukielka  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY P2

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt. Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional
circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.
Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/11901  **Respondent:** 8922177 / Beverley Weston  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object to proposals within the Local Plan to build within the Green Belt. The NPPF guidelines state very clearly that development must be sustainable. Nibbling away at the Green Belt is intrinsically unsustainable, and the Plan is therefore unsound within NPPF guidelines.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/11903  **Respondent:** 8922177 / Beverley Weston  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

GBC stated that it would prioritise development of brownfield sites within the urban area over development in the Green Belt. The new Plan overemphasises commercial development within the town and allocates insufficient brownfield sites to house building.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/15917  **Respondent:** 8922401 / Ken Harrap  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I strongly object to proposals in the Guildford Local Plan to build within the green Belt.

I object also to the proposals to increase the settlement areas of villages and even to remove some from greenbelt status. This has little to do with satisfying local housing needs and much to create a developers charter. This policy is totally flawed and gives no regard to environmental considerations. The greenbelt is sacrosanct and must be preserved and nurtured for present and future generations.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
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<td>I object to all incursions on the Green</td>
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<td>I object to the erosion of the greenbelt, the development of the Garlicks Arch area and especially the development of an on/off ramp to the A3 at West Clandon.</td>
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<td>I strongly object to the erosion of the Green Belt, the Green belt should be protected not eroded.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<th>Comment ID: PSLPP16/5532</th>
<th>Respondent: 8923905 / Claire Bridges</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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</table>
I object to the Green Belt realignment which will take Send outside the settlement boundary when there are still brownfield sites available for development in urban areas which would have much less impact on local environment and infrastructure. By your own admission, "major consideration has been given to protecting greenbelt land through a "brownfield first" approach" and yet you appear to be deliberately ignoring brownfield sites in favour of targeting greenbelt.

This raises serious questions about why and concerns about who GBC is actually serving.

It has never been made clear by GBC why there is a need for such a vast amount of additional housing within the next 20 years for an area which is primarily residential and not industrialised.

I object to the removal of Send from the Green Belt because the village and its countryside provide a necessary buffer between Woking and Guildford.

The number of homes proposed for Send (693p.a.) is completely disproportionate in the context of a village like Send. The extensive development proposed for Send and elsewhere in this locality such as Garlick's Arch, Gosden Hill and Wisley Airfield means that, in effect, it will become a ribbon development from Guildford almost as far as Cobham and transform a pleasant rural area into suburbia.

The Green Belt policy has always been very clear. It is to stop urban sprawl and prevent joined up developments. This plan seems contrary to this policy and would appear to work in contravention of this.

I am concerned that GBC is not calculating their requirements correctly and is mixing up the temporary student requirements at places such as Surrey University, with that of the needs of the local Guildford population. My step father has lived in the area for 50 years and has expressed his exasperation that at no point during this time has he experienced a supposed demand for such an enormous amount of homes required. I myself have not witnessed this demand from local people or companies, so I can only assume that all these homes will be lived in by people who are outside the GBC area and will be shipped in to live and work. If so, I object to this principal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17007  Respondent: 8923905 / Claire Bridges  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Having carefully examined the above Proposed Plan I would like to place on record my objections which I would like to be seen by the Inspector.

**Policy P2 on page 48**

I object to the Green Belt realignment which will take Send outside the settlement boundary when there are still brownfield sites available for development in urban areas which would have much less impact on local environment and infrastructure. By your own admission, “major consideration has been given to protecting greenbelt land through a "brownfield first" approach” and yet you appear to be deliberately ignoring brownfield sites in favour of targeting greenbelt. This raises serious questions about why and concerns about who GBC is actually serving.

It has never been made clear by GBC why there is a need for such a vast amount of additional housing within the next 20 years for an area which is primarily residential and not industrialised.

I object to the removal of Send from the Green Belt because the village and its countryside provide a necessary buffer between Woking and Guildford.

The number of homes proposed for Send (693p.a.) is completely disproportionate in the context of a village like Send. The extensive development proposed for Send and elsewhere in this locality such as Garlick’s Arch, Gosden Hill and Wisley Airfield means that, in effect, it will become a ribbon development from Guildford almost as far as Cobham and transform a pleasant rural area into suburbia.

The Green Belt policy has always been very clear. It is to stop urban sprawl and prevent joined up developments. This plan seems contrary to this policy and would appear to work in contravention of this.

I am concerned that GBC is not calculating their requirements correctly and is mixing up the temporary student requirements at places such as Surrey University, with that of the needs of the local Guildford population. My step father has lived in the area for 50 years and has expressed his exasperation that at no point during this time has he experienced a supposed demand for such an enormous amount of homes required. I myself have not witnessed this demand from local people or companies, so I can only assume that all these homes will be lived in by people who are outside the GBC area and will be shipped in to live and work. If so, I object to this principal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2645  Respondent: 8924065 / Rachel & Colin Holloway  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –
Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. **I OBJECT to not protecting the Green Belt**

I OBJECT to any proposal to take land out of the Greenbelt as is suggested with villages such as Ripley, Send and Clandon as well as sites of Wisley Airfield (A35) and Garlick’s Arch (A43). **The National Planning Policy states clearly that it requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt and that housing need is not such an exceptional circumstance.**

There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/1206  **Respondent:** 8925153 / D B Saidman  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings**

I object to the draft Local Plan for the following key reasons:

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/3859  **Respondent:** 8925217 / Andrew Lock  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I am writing today to **object** to the 2016 draft local plan

My reasons are as follows

---
1. **THE GREEN BELT**

So far, no exceptional circumstances have been shown to build on Green belt land.

The Green Belt is there to stop neighbouring towns from merging. To stop the unrestricted growth of built up areas. It enables people/Families from the cities to have easy access to the countryside.

THIS SHOULD BE PROTECTED !!

Moving the green belt boundaries.

This can mean only one thing……more development encouraged.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/3865  **Respondent:** 8925217 / Andrew Lock  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Loss of Green Belt land:**

Sadiq Khan, new Mayor of London, has instructed London planners not to approve development on Green Belt Land within the M25. If we continue to build on our countryside it won’t be many decades before we have none left. Creeping development has led to almost continuous housing from Central London to Effingham. Is this to carry on to Guildford and beyond? (1,700 houses are planned for the Guildford end of the Hogs Back and 1,000 new houses on greenfield sites in Normandy.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/11879  **Respondent:** 8925569 / Gaynor Donnell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Removing The Horsley’s from the Greenbelt - This is a disgrace. Horsley is GREENBELT. It is beautiful and a lovely village. Your plans are to make it into a small town which is unacceptable and NOT required. There is scope for small infill developments as have happened over the years, but not 100's of new houses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/14968  **Respondent:** 8926241 / Amanda and Nigel Baines  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
To lose 1.6% of the greenbelt is too much. Current planning legislation is so open to interpretation allowing private developers to wriggle out of classifications and statutes leading to the wholesale concreting over the greenbelt. Once it has gone, it has gone. To allow developers even a toehold into development of any sort will open the floodgates literally and metaphorically. Time and again it has been proven that green areas are vital to the wellbeing of people, beneficial to those with mental health problems and extremely necessary in assisting with pollution and flooding. There are some enlightened developers who have actively worked with local wildlife trusts and national conservation bodies to great effect but Guildford Borough Council seems to have managed to overlook such worthy companies!

I OBJECT most strongly to the somewhat cavalier and unimaginative approach to the preserving and improving the valuable commodity that is our countryside and the few remaining green areas within Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5833  Respondent: 8926305 / Jeanette Allcard  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I strongly object to Green Belt land being used for building houses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10987  Respondent: 8926401 / Christine Medlow  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

P2 Green Belt

I welcome the policy statement “We will continue to protect the Green Belt” but this policy is already compromised by the decision to develop on some green belt areas. I would appreciate a more authoritative policy, and reconsideration of the development proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15138  Respondent: 8926529 / Annie Cross  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy P2 - Green Belt
I strongly object to GBC considering building new developments of 2,000 houses in Green Belt. I object to Gosden Hill, Blackwell Farm and the former Wisley Airfield becoming new towns 'dumped' in the Green Belt for reasons of economy and convenience. I particularly object to the former Wisley Airfield being considered for a new town as this is slap bang in the middle of a green belt area and totally unsustainable, as accepted by the recent Planning Committee who recently unanimously rejected a planning application on various NPPF grounds. This site is far too close to Cobham (1.5km), Pyrford (1.5km) and Woking (2.5km) not to become their urban areas over time which will totally wipe out green belt in this area.

Developments of 2,000 houses in the Green Belt are exploitation and fulfil developer's dreams who can escape their affordable homes targets (clause 4.2.40) and provide houses for those from outside the borough. I object to GBC realising those developers dreams and ignoring those of the residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp171/1862  **Respondent:** 8926529 / Annie Cross  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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**Policy P2 – Green Belt**

1. I object to the GBC amended plan ignoring the NPPF rules - "The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence" (NPPF Section 9, paragraph 79), instead planning to remove huge swathes of land out of the Green Belt without proven "exceptional circumstances" (NPPF, Section 9, para 83).
2. I object: that GBC have not amended the proposed Green Belt boundary for Ripley Village (Appendix H) as it was agreed that the part running along the footpath on Ripley Green would be amended to the footpath running in front of the houses on Ripley Green.
3. I object: to the extension of the site A35 (former Wisley Airfield) proposed for removal from the Green Belt as this will allow the site to be developed, although it is the only unique site in the draft Plan totally surrounded by Green Belt whilst every other strategic site is adjacent to urban areas.
4. I object: to the need to extend site A35 when the 2017 AECOM report on site A35 describe it as the site with the worst sustainability score out of all the large sites in the proposed draft Plan. With only 17ha true brownfield, a runway never built on and the remainder of the site farming land, no exceptional circumstances are shown for a major development.
5. I object: to GBC not providing any indication of the “exceptional circumstances” for removing Wisley (site A35) from the Green Belt or applying constraints.
6. I object: to Wisley Airfield being removed from the Green Belt in return for the Green Belt being extended between Ash Green village and Ash and Tongham.
7. I object: to the removal of NPPF from ‘Key Evidence’ as these are government rules.
8. I object: GBC’s inconsistency and lack of credible consideration of all sites. These include:

The removal of site A46 (land south of Normandy/north of Flexford), the only site similar to A35, also located in Green Belt but with a railway station and bus services running alongside.

The inclusion of site A35 (Wisley), in the centre of Green Belt with just a few houses alongside and NO railway within walking distance and a poor Kingston to Guildford bus service on the A3.

17. I object: to the amended plan ignoring the 32,000 comments received from their 2016 consultation, a huge public response.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Comment ID: PSLPP16/650</th>
<th>Respondent: 8926657 / Lian Grieves</th>
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<tr>
<td>I object to the 2016 draft Local Plan. In addition I object to the following specific points:</td>
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<tr>
<td>1) I OBJECT to the intended erosion of the Green Belt. It is there for a reason and it is not for a passing council to short-sightedly remove for future generations.</td>
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<td>2) I OBJECT to the &quot;in-setting&quot; of any villages from the Green Belt.</td>
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<td>I feel strongly that the Metropolitan Green Belt is a vital and precious part of our heritage and should not be subjected to any development other than where truly exceptional circumstances are proven. The draft Local Plan does not provide any such circumstances.</td>
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<th>Comment ID: PSLPP16/11364</th>
<th>Respondent: 8927297 / Amanda de Haast</th>
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<td>I was under the impression that the green belt only to be overturned in &quot;exceptional circumstances&quot;. I feel that these exceptional circumstances need to be outlined clearly to the local community as I do not feel that this has been done. I also feel that the plan has not considered how the increase in population and traffic will affect the Sheepleas nature reserve and site of specific scientific interest. Should the proposed plan be accepted how would these concerns of mine be addressed?</td>
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<td>I object to Policy P2- Green Belt and the Countryside/ and Policy P1 Surrey Hills ANOB</td>
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<td>In one breath you claim to want to protect the Metropolitan Green Belt and in the next you are proposing that close to 65% of further development should take place in that very Green Belt - quite unbelievable and utter madness. Green Belt was established for so many good reasons and you plan to ignore those and bulldozer and concrete large chunks of some of Surrey's most precious, green and environmentally sensitive land. There are no' exceptional circumstances' that could justify these proposals.</td>
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### Comment ID: PSLPP16/15724  Respondent: 8927841 / Tom Bomford  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the proposal to remove the Horsleys from the Green Belt

The "exceptional circumstances" required before taking this action have not been demonstrated.

I object to the extension of the boundaries of the Settlement areas of the Horsleys

No sound reasons have been given for the proposed changes, which appear to be aimed solely at increasing the available land within the settlements for future additional development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

### Comment ID: PSLPP16/11904  Respondent: 8927905 / Jacqueline M Fish  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Proposal to inset East Horsley from the Green Belt Policy

I OBJECT to the proposal that East Horsley should be inset from the Green Belt, instead of being ‘washed over’ as it is today. East Horsley is set in a rural location and the village has the look and feel of a rural village. Its Green Belt status has been a key factor in preserving that character. Woodlands and large residential gardens make a vital contribution towards biodiversity, provide wildlife corridors, and furnish those open spaces which are vital to the character of the greenbelt. Removal of the Horsleys from the Green Belt would require exceptional circumstances and these have not been demonstrated. There is no consideration in the plan of the effect of such insetting upon the villages and this is required by the National Planning Policy Framework.

Changes to the Settlement Boundaries

I OBJECT to the proposed Settlement Boundary changes in East Horsley. GBC are proposing to make a number of changes to the settlement boundaries of East Horsley and so expand the settlement area, as set out in the Proposals Map. The changes to the settlement boundaries in the Horsleys appear to have be done purely on the basis of including additional Greenfield sites which can then be built on. I can see no reasons given for the proposed changes and therefore the boundaries should remain unchanged.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

### Comment ID: PSLPP16/11662  Respondent: 8928033 / P. Richardson  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Lack of sincere consultation
Consultation with the relevant communities was not made and the last minute inclusion of the Gosden Hill Farm housing settlement, the secondary school at West Clandon Cuckoo Farm site – both on Green Belt sites - and the proposal to draw a settlement boundary around East Clandon are suspicious in that they were last minute inclusions and totally rejected by the communities concerned. Proper consultation and collaboration is required under NPPF155.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11701  Respondent: 8928033 / P. Richardson  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to not protecting the Green Belt (Policy P2).

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5716  Respondent: 8928161 / Jan Brophy  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2. I object to the removal of the Horsleys and the Former Wisley Airfield (FWA/TFM) from the Green Belt. The later site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the Horsleys and FWA/TFM from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/11926  Respondent: 8928289 / Trevor Skerritt  Agent:</th>
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<td>I strongly object to development of the Green Belt.</td>
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<td>The Green Belt was set up to check urban sprawl and to prevent neighbouring towns merging into one another and most importantly it was established to protect our precious countryside and diverse habitats for wildlife therein. Also importantly, it was established to encourage efficient use and re-use of urban areas so that building on green fields would not be required. Setting up of the Green Belt was also intended to preserve the setting and special character of historic towns and villages. It seems to me that the prevention of towns and villages merging into one another has been ignored.</td>
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<td>It is set out in the NPPF guidelines that only under exceptional circumstances could a Borough consider development of Green Belt land. Ministerial guidance expressly states that unmet housing need is NOT considered an exceptional circumstance, yet Guildford Borough Council are proposing to ride roughshod over this ruling and completely ignore it. Letters written to Sir Paul Beresford MP from Nick Boles and Rt Hon Eric Pickles in the summer of 2014 state that if housing need cannot be met because of Green Belt incursion <strong>that this is a reason to reduce the number of dwellings seemingly required.</strong></td>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
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<td>I strongly object to development of the Green Belt.</td>
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<td>The Green Belt was set up to check urban sprawl and to prevent neighbouring towns merging into one another and most importantly it was established to protect our precious countryside and diverse habitats for wildlife therein. Also importantly, it was established to encourage efficient use and re-use of urban areas so that building on green fields would not be required. Setting up of the Green Belt was also intended to preserve the setting and special character of historic towns and villages. It seems to me that the prevention of towns and villages merging into one another has been ignored.</td>
</tr>
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<td>It is set out in the NPPF guidelines that only under exceptional circumstances could a Borough consider development of Green Belt land. Ministerial guidance expressly states that unmet housing need is NOT considered an exceptional circumstance, yet Guildford Borough Council are proposing to ride roughshod over this ruling and completely ignore it. Letters written to Sir Paul Beresford MP from Nick Boles and Rt Hon Eric Pickles in the summer of 2014 state that if housing need cannot be met because of Green Belt incursion <strong>that this is a reason to reduce the number of dwellings seemingly required.</strong></td>
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Green Belt

I strongly object to development of the Green Belt and the insetting of villages.

The Conservative Government promised the Nation in their manifesto that they would protect the green belt unless exceptional circumstances prevailed. Indeed posters with the local Guildford MP and the deputy Council leader, Mr Furniss and their supporters were on the front of the local Conservative Association web site assuring us of this. Policies for the protection of the Green Belt are set out in the NPPF guidelines and Ministerial guidance, also received in writing, expressly states that unmet housing need is NOT considered an exceptional circumstance, yet Guildford Borough Council’s response to this is to remove huge swathes of land from the Green Belt and propose house building on these areas. Guildford Borough Council is proposing to ride roughshod over the national policy of preserving our precious countryside. Is this how Guildford Borough Council looks after its residents’ interest and those of future generations to come?

Many of the villages in the Borough’s area are of historical value and interest, yet Guildford Borough Council proposes removing most villages from the Green Belt. The case of East and West Horsley, the former an historic Lovelace Village and the latter an ancient village (with known settlement dating back to the Iron Age) and with a wealth of very old houses have had settlement boundaries defined solely to enable large developments to take place. This is ethically indefensible. Both these villages contribute hugely to the rural surrounds and have low density housing. Wildlife corridors are allowed because of the nature of the villages and a good level of biodiversity is maintained. Mass building will spoil this entirely. In particular, the site A39 in East Horsley already has a very defensible boundary in the form of a large ditch which runs along the east side of A39 and along the back gardens of the houses in Ockham Road North. This field should be outside the settlement boundary.

Guildford Borough Council has completely failed to use any of the powers given in the NPPF guidelines to apply constraints to development. Guildford Borough Council is completely failing its residents who elected them to look after their countryside.

Another factor that has failed to be considered is the fact that the two largest sites – the Hogs Back (Blackwell Farm) and Three Farms Meadows (Former Wisley Airfield) – are both working farms. Should these be taken out of commission at the very time that Government is saying how vital it is for our Country to provide our own food.

In conclusion, the latest draft of the local plan does absolutely nothing to allay the fears and objections raised by the previous draft. The reduction in housing numbers is derisory. No account seems to have been taken of the vote for the UK to leave the EU and the reduced population and economic downturn that is expected. The planners seem to have used no imagination as to how this Borough could flourish. There seems to have been no attempt to solve the housing crisis by providing low cost and social housing that we desperately need nor to address the imbalance of large expensive homes versus the smaller apartments and less costly family homes that are in such short supply. Brownfield land in the town centre should be used for the benefit of key workers. No attempt to address the burden put upon us by the large student population has been made (which by the way leaves considerable numbers of unused properties for parts of the year) and no vision for Guildford seems to be in place other than the creation of mass urban sprawl, which before long will stretch along the A3 all the way along to the M25 intersection.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/62  Respondent: 8929057 / East Horsley Parish Council (Nick Clemens)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY P2: Green Belt
Local Plan Policy P2 states that: *We will continue to protect the Metropolitan Green Belt.* We fully and un-equivocally support this policy.

Unfortunately, despite such brave words, GBC appears to be in breach of this policy itself through the housing policies that it has set out in the Local Plan. The analysis included in the Appendix shows that around 65% of the developments proposed in the Proposed Submission Local Plan are to be built on land currently within the Metropolitan Green Belt. We consider this outcome to be outrageous.

Under NPPF rules, GBC is permitted to make allowance for factors which may constrain the delivery of new housing, such as the need to protect the Metropolitan Green Belt or the restrictions required to protect the Surrey Hills Area of Outstanding Natural Beauty (‘AONB’) which is offered protection under the NPPF comparable to that of a national park. Although these areas make up a large proportion of the land area of Guildford Borough, GBC makes no attempt to reduce its housing delivery in order to take account of such constraints. We find this approach inexplicable.

There are also a number of further issues relating to the detailed implementation of this policy which are set out further below:

1. **Paragraph 4.3.13: Proposal to inset East Horsley from the Green Belt**

   Policy P2 proposes that East Horsley should be inset from the Green Belt, instead of being ‘washed over’ as it is today. Currently development is permitted within the settlement boundary, although this area is still considered to be Green Belt with a particular planning regime being applicable.

   East Horsley is set in a rural location and the village has the look and feel of a rural village. Its Green Belt status has been a key factor in preserving that character. Moreover, being ‘washed over’ by the Green Belt has not been a serious constraint on development within the village. For example, GBC’s planning records indicate that no less than 149 net new homes were added to the village housing stock through in-filling and brownfield developments between 2000 and 2015.

   GBC attributes the need to inset East Horsley to NPPF requirements, arguing that the test for remaining ‘washed over’ is that the village should make an important contribution to the openness of the Green Belt. This East Horsley clearly does. No less than 36% of East Horsley is composed of woodlands, whilst inside the settlement area there is an average housing density of just 8.1 dwellings per hectare (‘dph’). Woodlands and large residential gardens make a vital contribution towards bio-diversity, provide wildlife corridors, and furnish those open spaces which are vital to the character of the greenbelt. It is one thing for a planner to study a map and see a settlement area filled with housing, but it is quite another actually to come to a rural village like East Horsley and see how the Green Belt has preserved the rural character and openness of this village.

   Today East Horsley is a picturesque and flourishing rural community, which has and continues to experience steady incremental growth as a result of being ‘washed over’ by the Green Belt. As the saying goes: "If it ain’t broke, don’t fix it". This applies to East Horsley in the matter of insetting.

   EHPC therefore OBJECTS to the proposal to inset East Horsley from the Green Belt and requests that this proposal be dropped from the Local Plan.

2. **Paragraph 4.3.16 and Proposals Map: Settlement Boundary changes in East Horsley**

   GBC are proposing to make a number of changes to the settlement boundaries of East Horsley and so expand the settlement area, as set out in the Proposals Map, with the justifications seemingly provided in the Green Belt & Countryside Study prepared by the consultants, Pegasus.

   We object to two specific boundary changes, which have been proposed, as follows:

   1. There is a proposal to move the East Horsley settlement boundary westwards from behind the houses on the west side of Ockham Road North up to the eastern boundary of Lollesworth Wood. This proposal removes over 5 hectares of agricultural fields from the Green Belt. The present boundary line is clearly defined by a deep and well-maintained drainage ditch which is classified by the Environment Agency as a ‘main river line’ and therefore represents a highly defensible Green Belt boundary.
Moving this boundary west to the edge of woodland in no way improves its defensibility. Under NPPF rules Green Belt boundaries should only be changed in ‘exceptional circumstances’. We do not believe this proposal can be considered as an exceptional circumstance. Clearly the only justification for this change is to bring a large agricultural field within the settlement area in order to provide more housing land. However, under NPPF rules this is not a sufficient justification for changing a Green Belt boundary. As such, we believe it is an invalid proposal.

**EHPC accordingly OBJECTS to this proposed boundary change.**

1. There is also a proposal to move the East Horsley settlement boundary westwards from behind the houses on the west side of Kingston Avenue up to a tree line running along the Parish Boundary at the western edge of Kingston Meadows. The result is to take all of Kingston Meadows out of the Green Belt.

Kingston Meadows is the main public recreational space of East Horsley, comprising various sports facilities and playing fields. The present settlement boundary is clearly defined by a deep and well-maintained drainage ditch running along its eastern side. It therefore represents a very defensible Green Belt boundary. Moving this boundary westwards to the edge of woodland in no way improves its defensibility. Under NPPF rules Green Belt boundaries should only be changed in ‘exceptional circumstances’. We do not believe that this can be considered as an exceptional circumstance. As such we believe this is an invalid proposal.

**EHPC accordingly OBJECTS to this proposed boundary change.**

In the Green Belt & Countryside Study and its accompanying Topic Paper, GBC justifies the need to make changes in settlement boundaries in order to meet unfulfilled housing need in the Borough. However, Green Belt rules make it clear that unfulfilled housing need is not normally considered to be ‘an exceptional circumstance’. If it were the entire Green Belt would already be covered in tarmac.

The NPPF is clear that every movement in settlement boundaries must be justified by ‘exceptional circumstances’. GBC have offered only a generic justification in their Topic Paper of meeting unfulfilled housing need, but a case by case justification has not been provided. As such, we believe the settlement boundary changes referred to above (and many others) are invalid without such detailed justification.

1. **c) Paragraph 4.3.17: Proposal to remove Wisley Airfield from the Green Belt**

EHPC OBJECTS to the proposal to remove Wisley Airfield from the Green Belt. The only justification for this proposed change is unfulfilled housing need which is not considered an exceptional circumstance. The proposed Wisley development is discussed further below in the Site Allocation section.

1. **d) POLICY P2: Limited In-filling**

A new planning designation has been introduced called ‘the identified boundary of the village’. For East Horsley this covers a number of roads south of the A246. It is a sizeable area, covering 45 hectares, the equivalent of 23% of the present Settlement Area of the village. Within this area, Policy P2 sets out proposals that would allow ‘limited in-filling’ within this boundary.

We find it hard to reconcile the opening statement of Policy P2 that “We will continue to protect the Metropolitan Green Belt” with this sizeable reduction in effective Green Belt status. In our opinion, this policy represents a de facto extension of the Settlement Boundary and a substantial reduction in the operational effectiveness of the Green Belt, whose effectiveness is significantly weakened where this new planning designation applies.

EHPC accordingly OBJECTS to the proposal to designate roads south of the A246 as being within the ‘identified boundary of the village’ and to allow limited infilling within this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp171/88  **Respondent:** 8929057 / East Horsley Parish Council (Nick Clemens)  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The revised Green Belt Policy P2 continues to make the hollow promise that “The Metropolitan Green Belt will conlinue to be protected”. However, despite minor changes it has failed to revise Paragraph 4.3.13 "which proposes to inset the village of East Horsley from the Green Belt.

There is no justification for this approach. East Horsley is a rural village of very low housing density. Within the current settlement area the average density of housing is just 8 dwellings per hectare. Most houses lying within the current settlement area have large gardens that are filled with trees, shrubs and open lawns. As a result East Horsley makes an important contribution to the Green Belt of this area providing openness, picturesque green spaces and wild life corridors which support a rich biodiversity. For example, there are currently an estimated 43 different protected species of wildlife to be found in East Horsley.

If East Horsley is inset from the Green Belt, as proposed in the revised Local Plan under Policy P2, then important Green Belt planning protection will be lost over land currently within the settlement area. This will inevitably lead to increased development within this area and the loss of openness, destruction of trees and hedgerows, diminished biodiversity and the impairment of picturesque views of this rural village.

It is also important to recognise that the locality of East and West Horsley represents one of the first lines of defence against Metropolitan urban encroachment outside of the M25 circle. To inset East and West Horsley from the Green Belt would therefore represent a further weakening of this important Green Belt barrier. Accordingly:

EHPC strongly OBJECTS to the insetting of East Horsley proposed as part of Policy P2.

We also note one new change made to the proposed settlement boundaries of East Horsley under the revised 2017 local plan, as detailed in the accompanying Appendix II maps for East Horsley (South). The Amendment 4 on this map addresses land in the southern part of the village designated as being within the identified boundary of the village and which is currently Green Belt land outside of the settlement area. However, under Amendment 4 the settlement boundary is to be extended further south to encompass all of this area.

This is land which is close to and in some parts directly adjacent to the Surrey Hills AONB. It is a very low density part of the village located in a highly distinctive rural selling including in Chalk Lane a sunken single track road lined with chalk slopes and which dates back many hundreds of years. To bring such land within the settlement area of the village is not in any way justifiable and is very likely to lead to development that is inappropriate to the Green Belt. This area of the village has benefitted from Green Belt protection for many years but this proposed change would have a significant adverse impact and lead to the destruction on its character. Accordingly:

EHPC strongly OBJECTS to the movement of the settlement boundary proposed under Amendment 4 in Appendix H map of East Horsley (South), proposed as part of Policy P2.

The result of the proposed expansion of the settlement boundary further to the south of the A246, together with the other movements proposed at other locations, is to increase the total settlement area by some 37%, which is an extraordinarily large increase to be proposed by any local plan and will inevitably have an adverse impact on the character and form of the village of East Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/649  Respondent: 8929921 / Caspar Hancock  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the 2016 draft Local Plan. In addition I object to the following specific points:
1) I OBJECT to the proposed erosion of the Green Belt.

2) I OBJECT to any "in-setting" (or, in plain English, removal) of any villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Having resided here for 40 years (in early 1977) and maintained and cared for the Tillingbourne valley in most responsible manner, we object strongly to any plan concerning the removal of CHILWORTH from the GREEN BELT PROTECTION it currently enjoys.

The river is surely an asset of historic and economic value and must be guarded at all costs. We and our neighbours contributed many thousands of pounds just 2 years ago to the building of a bridge to preserve the flow of the river.

CHILWORTH and its environment are too precious to lose its AONB and protection.

Please.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Respondent: 8930209 / Ray Corstin</th>
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1. POLICY P2

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional
circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of “About Guildford” (published by the Council) on page 5 states that “... the Plan rejects any schemes that would have a detrimental impact on the Green Belt.” This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages.

In particular I OBJECT to the settlement boundary put round East Clandon with no reference to the residents or the Parish Council.

Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.
GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLP16/4468  Respondent: 8930209 / Ray Corstin  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. SITES - POLICIES A1 TO A57

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/872  Respondent: 8930209 / Ray Corstin  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to POLICY P2 (6), specifically the new phrasing ‘Limited infilling may also be appropriate outside the inset or identified settlement boundaries, where it can be demonstrated that the site is as a matter of fact on the ground within the village’ referring to Ockham and Wisley, and by extension to other villages with settlement boundaries. I feel this change in language creates less clarity around the purpose of settlement boundaries as regards development policy. This objection is made in the context of the fact that there is no change to POLICY P2 (5), the intention for East Clandon to have a settlement boundary for the first time, which I and fellow residents have previously and still object to.

I object that GBC are contravening the NPPF framework stipulation in paragraph 87 which states “As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.” (Policy P2, P3, E5). The Guildford Green Belt Group have stated that 70% of new housing will be in countryside and 58% of this is on Green Belt (Gosden Hill, Wisley, Blackwell Farm). This is exceptional in size and thus does not meet the criteria to demonstrate exceptional circumstances. I support instead developing and densification of brown belt and urban areas. According to Policy H13, developments should have a maximum (and minimum) densification policy to prevent developers from using land inefficiently which leads to countryside erosion and ineffective use of brownfield sites.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17703  Respondent: 8930305 / Elaine Best  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Policy P2: Green belt. I object to the removal of the green belt which was created for a purpose the value of which is very well known and documented. GBC’s own statement of “protecting the green belt from inappropriate development” is contradicted by its subsequent statement of “building 65% of proposed new development on green belt land”. I object to the insetting of 14 villages and the proposed infilling within another 11 villages thereby ruining the rural nature and destroying the very purpose of the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17706  Respondent: 8930305 / Elaine Best  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Finally, I have grave concerns over the appropriateness, viability and sustainability of the local plan. In respect of West Horsley where I live the case for developing sites A37, 38, 39 40 and 41 has not been made. I also believe the case for Wisley Airfield is similarly not made as unfulfilled housing need is not an exceptional circumstance for building on the green belt. Your statements of “we will continue to protect the Metropolitan Green Belt” are very hollow when reading this draft Local Plan. I regret to say I have no confidence that the very serious issues, concerns and objections raised by local people will be taken into account and acted upon although I live in hope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5450  Respondent: 8930465 / Michael & Carol Cook  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to not protecting the Green Belt. The Green Belt is there for future generations to enjoy. We as a nation are trying to promote the great healthy outdoors, encouraging young and old alike to cycle, walk and make use of the open green spaces. We shouldn't be building on these spaces.

I object to the developments proposed at Garlick's Arch, Wisley Airfield, Gosden Hill and Clandon Golf Course I object to the lack of proper infrastructure planning for those sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I avidly object to not protecting the Green Belt. The Green Belt is there to protect our green open spaces for future generations to enjoy as we have done over the years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Under the NPPF, no exceptional circumstances have been established to justify removing the land from the Metropolitan Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Also, particularly as a resident of Horsley I object to proposal regarding the Green Belt because:

The Green Belt is central to the essential character of the Horsleys as you admit the main purpose of the Green Belt is to keep a sense of openness between built up areas, in this case around London. Green Belt also provides opportunities for people to access the countryside, to keep land for agriculture, forestry and similar land uses, and for nature conservation

The need for more housing is understood but the case for the scale and for the locations included is certainly not proved. It would be far better in planning terms for the GBC area to use brownfield land and create sustainable settlements that would not have an extremely detrimental effect on existing settlements, changing forever their character.

The plan admits that: ‘special circumstances would need to be demonstrated for development in the Green Belt’, however no such special circumstances have been demonstrated to remove villages from the Green Belt. The Ministerial Statement of 1 July 2013 stated ”unmet need is unlikely to justify the very special circumstances necessary to permit such development in the Green Belt”. The plan would therefore presumably be open to legal challenge.

The plan proposes 9,000 new homes to be built on Green Belt land. There are currently 50,000 homes in Guildford so this would equate to 18% of existing homes. The National Planning Policy Framework (NPPF) requires any change of Green Belt boundaries to demonstrate exceptional circumstances. Unmet housing need is not an exceptional circumstance in
law, however the existence of the Green Belt/AONB is a reason for not meeting objectively assessed housing need. Such protected land is a legal constraint against any such development. No exceptional circumstances have been cited so Green Belt boundaries should not be changed. The villages are rural in character, one of the main reasons Surrey is so attractive, and should remain in the Green Belt. To remove most of the borough’s villages from the Green Belt would change the nature of this area of countryside forever and would eventually merge historic and separate villages - an environmental outrage.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/12628  **Respondent:** 8931233 / John Pemberton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

_Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )_

I object to the villages of Send, Ripley, Horsley E & W, Ockham & ten other villages in GBC being removed from the Greenbelt. The Greenbelt as required by the National Planning Policy framework was intended to be permanent. No special circumstances have been raised to justify a change of policy.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/10764  **Respondent:** 8932769 / Janette M. Webb  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

_Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )_

The villages of Wonersh and Albury do not have this threat. Why does Chilworth? It has great historic interest with the Gunpowder Site plus all the other industries that were there. People around the country are genuinely interested in this sight. How awful it would be if they could not be viewed in their glory....the full extent of the sight. Guildford should be capitalising on such a precious space, not reducing its importance by allowing a sprawl to envelop it.

This cannot be allowed. The green belt is in place for a purpose. I do not want to be one of the generation who removes it and spoils Chilworth for ever.

This is an unprecedented action that must be stopped!

The villages of Chilworth, Shalford and Peasmarsh are unique villages with diverse attractions surrounding Guildford which help to make Surrey such an interesting and attractive area. By "insetting" them, within a very short time there will be one sprawl, starting in Guildford. Where this would end is anybody's guess as without the strict development laws to protect our lovely area the natural boundaries which separate the villages would be swallowed up, resulting in an unmanageable sprawl.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/8745  **Respondent:** 8933185 / Peter See  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

_Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )_

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The villages of Chilworth, Shalford and Peasmarsh are unique villages with diverse attractions surrounding Guildford which help to make Surrey such an interesting and attractive area. By "insetting" them, within a very short time there will be one sprawl, starting in Guildford. Where this would end is anybody's guess as without the strict development laws to protect our lovely area the natural boundaries which separate the villages would be swallowed up, resulting in an unmanageable sprawl.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Objection** to building on the Green Belt (with very few small scale exceptions). See page 6 of this letter.

**Objection** to development and loss of Green Belt at Normandy, Flexford and Blackwell Farm. Regarding Blackwell Farm, the objection is in relation to too much housing density and too much land will be taken from the Green Belt for housing. The existing character of the Borough will not be protected. Also, the clear distinction between urban and rural areas will not be maintained (ie between Aldershot/Tongham/Ash to the west and Guildford to the east).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPP16/8759 **Respondent:** 8933185 / Peter See **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

4.3.13 Policy P2 : Green Belt

My general views are given on pages 6-7.

**Objection** Fairlands, Flexford, Normandy and Wood Street village should not be inset (ie removed) from the Green Belt. As these villages are not fully developed, they make an important contribution to the openness of the Green Belt (between the main conurbations of Aldershot/Tongham/Ash and Guildford). There should be no encroachment onto the Green Belt. It is important to look after amenity, air quality, etc.

Page 49 Policy P2: Green Belt

**Objection** to the text under 'Extensions or alterations'.

Regarding the way Policy P2 has been written, you say '...meet the following criteria': So, you should list the criteria without unnecessary words, which get in the way of the actual criteria. You have the heading 'Extensions or alterations'. My view is that under this heading you should have 'These should not result in disproportionate additions compared with the exterior dimensions of the original building (taking into account the size of buildings nearby)'.

**Reasons for objection:**

1. Your proposed text is open to too much interpretation, to the possible detriment of home owners. The words 'provided that it would not result in disproportionate additions over and above the size of the original building' are somewhat subjective and could be too restrictive.
2. The size of original buildings should not preclude extensions or alterations if (in general terms) they will be in keeping with nearby buildings, they will be within a garden with sufficient space, they will be of a suitable appearance and they will not harm the overall appearance of the Green Belt.
3. Paragraph 4.4 Policy HI : Homes for All, states "New homes should support the changing needs of individuals and families at different stages of life". While this paragraph may, or may not be, intended to apply to the interior of a home, there is no reason why it should exclude changes to the exterior of a new home. This principle should also apply to Policy P2 (ie to homes which are not new) as far as possible.
4. It is not tenable for the Council to allow - or even encourage - thousands of new buildings, estate roads etc, to be constructed on Green Belt land (thereby harming the Green Belt) while at the same time the Council will be enforcing Policy P2. Home owners may well think that Policy P2 is proscriptive, inconsistent and unfair, when they wish to build modest extensions or alterations to their homes in the Green Belt.

You may think that the Council's planning staff will take a 'sympathetic view' with planning applications, but Policy P2 should not rely on the sympathetic interpretation of staff. Extensions and alterations are very important to homeowners,
especially if they have growing families. So Policy P2 should be improved to give more help to home owners who would like to extend or alter their homes.

Regarding your criteria listed under the heading 'replacement buildings', the text could be shortened (to avoid duplication of words etc) to:

'A new building:

• should have the same use
• should not be materially larger than the one it replaces
• should be sited on or close to the position of the existing building'.

Page 49. Policy P2: Green Belt

**Objection** to Limited Infilling, as the following should be included in the text which starts with the village of Albury:

Fairlands, Flexford, Normandy, Wood Street Village.

Reasons for objection are shown in Paragraph 4.3.13 on page 10 of this letter.

**Extensions or Alterations**

**Objection** - it is possible that your proposed guidance calculations may sometimes be unnecessary. Or your calculations may be too prescriptive, too restrictive, inconsistent (bearing in mind widespread building development allowed by the Council on the Green Belt, and unfair. May I urge you to take a more 'generous approach' than in the past with your calculations. For example, the floor area of a new loft conversion need not affect the Green Belt. There will still be plenty of scope for planning applications for extensions or alterations to be turned down if appropriate. There is no need to go back to the old, restrictive (some might say misleading)* policy of 'keeping' small dwellings; it appears that the Council will have large numbers of new, small, affordable homes in (or near to) the Green Belt in due course, including Rural Exception Homes.

* See Local Plan 2003, paragraph 5.28 (which stated that the loss of small dwellings should be resisted) and Policy H9. Certain extensions to small dwellings (making them medium sized dwellings) were in fact allowed under 'permitted development'. After building work, subsequent planning applications a few months later for even more building work, were then approved. But this method of overcoming the Council's resistance, cost homeowners a great deal of time and money and wasted significant amounts of building material.

You refer to the forthcoming Green Belt Supplementary Planning Document (SPD) which will be prepared to support Policy P2. You have consulted widely on the Draft

Local Plan. Will you similarly consult widely on the SPD and give the public the chance to comment on it? It will probably be of importance to homeowners if they want to extend their homes or alter them.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPP16/8804  **Respondent:**  8933185 / Peter See  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is **Sound**? ( ), is **Legally Compliant**? ( )

I welcomed your contribution to the Queen's Speech debate on housing on 5 June. Further to recent discussions, I would just like to take the opportunity to explain the Government's on-going, commitment to national Green Belt protection, reflecting what Ministers have regularly told Parliament.
As set out in the Coalition Agreement, this Government is strongly committed to protecting the Green Belt. National policy on the Green Belt is set out in the National Planning Policy Framework, which we published in March 2012, and which broadly reflects long-standing planning policy (previous editions of Planning Policy Guidance 2).

The Framework makes clear that most development in the Green Belt is inappropriate and should be approved only in very special circumstances. Planning guidance, updated in March 2014, also states that unmet house need (including for travellers sites) is unlikely to outweigh the harm to the Green Belt to constitute the very special circumstances justifying inappropriate development within the Green Belt.

Moreover, I would note:

- Paragraph 14 of the Framework clearly states that, when plan-making, Local Plan should meet objectively assessed needs, unless specific policies in this Framework indicate. Development should be restricted: these policies include the Green Belt and Areas of Outstanding Natural Beauty.
- Paragraph 17 notes that the core planning principle that underpin plan-making include both protecting the Green Belt and recognising the intrinsic character and beauty of the countryside.
- Paragraph 83 states that, once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.
- Paragraph 89 allow for redevelopment of previously developed sites (brownfield land) within the Green Belt if it would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.
- Paragraph 80 notes how the purposes of the Green Belt include checking the unrestricted sprawl of large built-up areas, preventing neighbouring towns merging into one and assisting in safeguarding the countryside from encroachment.

I have also communicated many of these points on existing planning policy to the Planning Inspectorate. A copy of my letter from March can be found online at [https://www.gov.uk/government/publications/planning-inspectorate-local-plans](https://www.gov.uk/government/publications/planning-inspectorate-local-plans).

Our abolition of the last Administration's Regional Strategies, including the abolition of the South East Plan, sought to end the unwanted 'top-down' pressure on many local authorities to delete. The Green Belt I recognise that creating a Local Plan is a challenging process, not least since there is no longer an unelected Regional Assembly at which to point the blame. It is now for locally elected councillors to determine where badly-needed new homes should and should not go, in consultation with local residents.

I hope you find this of use, and please feel free to pass this letter to constituents or any other interested party if you feel it would facilitate public debate and scrutiny.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/7557  **Respondent:** 8933793 / Sally Novell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate?**

3. I OBJECT to the Settlement Boundary which has been imposed on East Clandon without any consultation. This imposition provides no protection to further development outside of the settlement boundary (Policy P2 para 4.3.25) and is unnecessary in an already tightly developed ancient and rural conservation village. This proposal would endanger the openness of the Green Belt, the views in and out of the AONB (protection of the AONB Policy P1) and the character of the village.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
1. Policy P2 – Green Belt: I OBJECT to this significant erosion of the Green Belt with the proposals for large towns being developed on Green Belt land thereby removing the openness of the Green Belt. The huge developments proposed for the North East quadrant of the borough (Wisley Airfield, Gosden Hill Farm, various farms and tracts in the Horsleys and Garlicks Arch at Send) will have a severely detrimental effect on the amenity of the area.

2. I OBJECT that Policy P2 is not met where it states that Green Belt should be protected. I object to the disproportionate use of Green Belt land for housing – some 65% of the housing proposed is on Green Belt, with little consideration being given to redevelopment of brown field sites.

3. I OBJECT to the changes to Green Belt boundaries. This is not justified by any very special circumstances. All the Green Belt sites meet the five purposes of the Green Belt.

4. I OBJECT to building on the Green Belt because the essential characteristic of Green Belt is its openness and permanence (National Planning Policy Framework paragraph 79).

5. I OBJECT to the fact that brownfield land would be disproportionately used for commercial development and unnecessary retail expansion. This means Green Belt land is used for housing development unnecessarily;

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

14. I OBJECT that GBC are contravening the NPPF framework stipulation in paragraph 87 with the proposed developments at Gosden Hill Farm, East and West Horsley and Garlicks Arch, Send. Paragraph 87 states “As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.” All of the proposed developments are out of proportion to the surrounding area and none qualify for the exceptional circumstances required to take them out of the Green Belt.

15. I OBJECT specifically to the proposed building on Gosden Hill Farm on Green Belt designated to prevent West Clandon being absorbed into a sprawling urban environment. The proposed development would be four times the size of the village and is completely disproportionate and unjustified.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to this policy

This policy states: "the general extent of the Green Belt has been retained". This is a lie. Insetting 14 of the borough's villages is not in any view "retaining the general extent of the Green Belt. I am totally opposed to the named villages and additional land surrounding those villages being taken out of the Green Belt. The Green Belt policy and the Green Belts themselves were devised for just this situation in which we find ourselves now. It is essential to the preservation of the Green Belt that it should not be eroded in this way. You will be well aware of the prohibition in para 83 on Guildford Borough Council (GBC) changing established Green Belt boundaries except in 'exceptional circumstances'. You have outlined no such exceptional circumstances either in the Plan or in the background LAA. With all the guidance provided recently by Government Ministers, it is now quite clear that unmet housing need (if there were...
unmet housing need in question which I dispute) does not constitute exceptional circumstances. There are therefore no grounds for the Green Belt boundary to be changed in Guildford Borough.

As the National Planning Policy Framework ('NPPF') states at para 79: "...the essential characteristics of the Green Belts are their openness and permanence." The characters of those villages which I know well (the Horsleys, Effingham, Ripley, Shere) are all different but all with an essential openness quite different from the urban areas due to their small sizes and very low density of housing and extensive green areas. I am sure this is true of all the villages. They sit in the open landscape of the Green Belt and form an essential element of it. Exactly as it says in para 86 of the NPPF, "It is necessary to prevent development in [those] village[s] because of the important contribution which the open character of [each] village makes to the openness of the Green Belt [and so] the village[s] should be included in the Green Belt." In particular, East Horsley, where we live has had its openness protected by the actions of the local community in purchasing large areas of woodland in the (The Forest and Great Ridings Wood) to be held in perpetuity by the Woodland Trust.

We need you to continue the vision and tenacity which led to the creation of the Green Belt as it continues to serve all the purposes set out for it at the time (the lungs of London) and later in the NPPF (stopping urban sprawl and four others) and the villages need to stay in the Green Belt for its proper protection. The role of Surrey's open spaces open villages and woodland in the fight against climate change will only become more obvious as time passes as will their crucial role for wildlife and biodiversity. The amenity value of these villages for local towns and London is clearly seen - just one example is the hundreds of cyclists coming through East Horsley through the year. Another is its Millenium walking trail showing its openness. You can not pick off some villages and take them out of the Green Belt without endangering the whole by allowing urbanisation into its heart. You only need to look at the Weybridge, West Byfleet, Woking spread to see what will happen if villages are taken out of the Green Belt. I have seen nothing in your documents to convince me this is necessary.

In the NPPF at para 58, it states "Local and neighbourhood plans should develop robust and comprehensive policies that set out the quality of development that will be expected for the area. Such policies should be based on stated objectives for the future of the area and an understanding and evaluation of its defining characteristics." With 89% of Guildford Borough in the Green Belt, its overriding defining characteristic is its Green Belt status, a fact that may be forgotten from the Borough Council Offices in the centre of Guildford. GBC's Local Plan needs to have that defining Green Belt characteristic at its heart and until it does so is fundamentally flawed and I object to it in total. Let your legacy and ours be the preservation and continuation of the Green Belt for future generations as was always intended and not its destruction.

I object to the extensive changes to settlement boundaries by the insetting boundaries and to infilling 12 of the Borough's villages. This is an indecent land grab of fields and other open land, one must assume for future development purposes and has not been justified in any way.

The flawed Green Belt and Countryside Study clearly discloses GBC's bias in favour of development in the Green Belt in the brief for the GBCS, which was effectively how to destroy it: ‘Provide a robust, independent assessment of Guildford Borough’s Green Belt and ‘countryside beyond the Green Belt' with a view to potential release for development purposes in the longer term, should this be necessary within the

Guildford Local Development Framework Plan Period 2006-2026 (and up to 2030), identifying realistic sustainable location(s) for green field release.’ p1 of the summary document to the GBCS.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Why is so much green belt to be lost? What are the exceptional circumstances that require such a widespread sacrifice of our precious countryside? There should be much more emphasis on brownfield development such as providing housing in the town instead of unneeded retail space. The plan anticipates using all the potential greenbelt sites in one planning cycle leaving no similar expansion into greenbelt for the future generations. This is desperate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1639  Respondent: 8934657 / Nigel Watson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The new in-setting boundary would extend the old settlement boundary and include fields and open spaces, which would thereby be made vulnerable to future development. This applies to currently valuable open spaces like Kingston Meadows (by East Horsley Village Hall) - I question why.

The current Plan would if implemented amount to a disaster, leading to long term destruction of the Green Belt and a much reduced quality of life in our villages. I therefore hope you will read my comments carefully and draw the appropriate conclusions.

I support the Guildford Greenbelt Group’s useful critique of the Local Plan, and the CPRE’s criticisms of the draft Plan’s housing need figures. I also support the arguments concerning the local situation being put forward by the East Horsley Action Group.

In my view it should be a fundamental principle that to protect the environment, and for many other reasons, there should be no building on Green Belt land and no boundary changes to reduce the amount of Green Belt land. (More about this is said in some of the following detailed sections of these comments, and in my Annex to them).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp1711385  Respondent: 8934657 / Nigel Watson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

GBC seems to be taking the housing need projections of GL Hearn as the housing targets proposed in the Local Plan. This however fails to take into account any of the significant constraints which limit the supply of housing across the borough, in particular the large proportion of land which currently falls within the Metropolitan Green Belt; and our already over-stretched infrastructure.

GBC has a revised Green Belt policy P2 in the Local Plan which states that “The Metropolitan Green Belt will continue to be protected”. However in reality this alleged “protection” is totally incompatible with GBC’s proposal to remove large amounts of land from the Green Belt in order to build the large number of houses required for the Plan’s excessively high housing targets.

It appears that the majority of the land being proposed by GBC for development under the revised Local Plan is currently part of the Metropolitan Green Belt; the Guildford Green Belt Group have estimated that some 57% of all the new housing proposed in the 2017 GBC Local Plan is to be built on land which is currently Green Belt.
This is contrary to ministerial guidance and planning inspectorate decisions which continue to support the position that unfulfilled housing need does not constitute the ‘very special circumstances’ needed to justify building on Green Belt land.

The Green Belt & Countryside Study produced for GBC by the consultants Pegasus proposes numerous changes in Green Belt boundaries without due justification in order to deliver land for housing use in the Local Plan. I consider that the justifications given by Pegasus in their Green Belt & Countryside Study are extraordinarily weak and in many cases fail to meet the planning criteria required for moving long established defensible.

Green Belt boundaries.

East Horsley Parish Council has commented further on the detailed Green Belt boundary changes proposed by GBC and I agree with their comments on this. It is especially concerning that the Green Belt land selected for housing in GBC’s Local Plan is mostly in the north eastern part of the borough, and thus is closest to London. Eroding this section of the Green Belt would take away precisely the part that is most needed to prevent encroachment of the Greater London suburbs into our borough; it would therefore negate the most vital element in the whole Green Belt concept.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1386  Respondent: 8934657 / Nigel Watson  Agent: 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

As I have already pointed out the revised Green Belt Policy P2 continues to make the hollow promise that “The Metropolitan Green Belt will continue to be protected”. However, this is worthless if the reality of the Plan is to remove some currently protected land from Green Belt designation!

On specifics, I object to the proposal to inset the village of East Horsley from the Green Belt. There is no justification for this approach. East Horsley is a village of rural character and low density (just 8 dwellings per hectare). Most houses in the village have large gardens with trees, shrubs and lawns; many also use hedges as their boundaries, and some contain ponds. As a result East Horsley makes an important contribution to the Green Belt, providing openness, picturesque green spaces and wildlife corridors which support a rich biodiversity. For example, there are currently an estimated 43 legally protected species of wildlife to be found here.

If East Horsley is inset from the Green Belt, as proposed in the revised Local Plan under Policy P2, then important Green Belt planning protection will be lost over land currently within the settlement area. This will inevitably lead to increased development within this area - and the loss of openness, destruction of trees and hedgerows, diminished biodiversity and the impairment of the landscape. There are already considerable development pressures in the Horsleys leading to the over-enlargement of houses and some loss of green space; the changes proposed in the Plan would make this far worse. As I have already said, the Green Belt land surrounding East and West Horsley is one of the first lines of defence against urban and suburban encroachment outside the M25. Insetting East and West Horsley from the Green Belt would therefore represent a significant weakening of one of the most important parts of the Green Belt barrier in Guildford Borough.

I note that the analysis of the 2017 Plan by East Horsley Parish Council concludes that the proposed changes in our settlement boundaries would increase the total settlement area by some 37%. This to my mind is an extraordinary and disproportionate increase. I object strongly to this proposal, which if implemented would inevitably have a very adverse impact on the character of the village. East Horsley and West Horsley are presently still rural, but an increase on this scale would make us into a suburb!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
There should be NO BUILDING ON THE GREENBELT without local resident agreement. This greenbelt destruction is robbing the next generation of their heritage and driving up pollution and traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Policy P2 THE GREEN BELT

Guildford Borough Councillors were elected on the promise that they would protect the precious Metropolitan Greenbelt! Sadly many councillors seem to have a short memory for their wise words at the election. This plan drives a super-sized digger through the precious Metropolitan Green Belt. On examination around 650/0 of the proposed developments are on the current Metropolitan Green belt. What sort of legacy is that to hand on to future generations?

The proposal to remove Greenbelt status from East Horsley & West Horsley is appalling. Not only is the plan proposing to remove the 'washed over' Greenbelt status from the current village area, it is proposing to extend village boundaries so that even more land will come out of the Greenbelt. The NPPF states that 'once established Green Belt boundaries should only be altered in exceptional circumstances'. I see no evidence that GBC have met these exceptional circumstances. The general consensus is that this is developer led.

I particularly object to 2 boundary changes to the village of East Horsley -

1. Kingston Meadow

The proposal to include the whole of Kingston Meadow within the settlement area and so take this valuable area out of the Green Belt seems ludicrous. Kingston Meadow is the main public recreational space in East Horsley. Why take this out of the Green Belt? I can see no logical reason for this by a Council supposedly supporting the Green Belt. Surely there can be no 'exceptional circumstances' to justify this unless beady eyes are on this delightful space for development in the long term.

2. Area south of the A246

I am particularly alarmed by the proposal to designate a large area south of the A246 as within 'the identified boundary of the village'. This is a huge area involving 45 hectares that is equivalent to 23%0 of the present settlement area. Policy P2 says this change will allow for limited infilling in the precious Green Belt area. Well - this area is at the start of the chalk downland that constitutes The North Downs - a very precious area much beloved by walkers & cyclists. This is yet another strange proposal from a council vowing to protect the Green Belt.
I STRONGLY object to ALL the proposals in The Metropolitan Green Belt is one of our most precious assets.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2261  Respondent: 8938881 / Ann Cook  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I have carefully perused the new document with its amendments to GBC’s Local Plan 2016. Guildford Borough Council had many thousands of objections to that plan; these objections particularly centred on protecting the Green Belt. I was looking forward to seeing some changes in the 2017 Plan to reflect the concerns of local residents. I am sadly disappointed!! In fact I am much struck by the little heed taken by GBC of the wishes of the residents of the borough. I therefore write AGAIN to object to the plan.

Housing Target & The Green Belt

I consider the proposed housing target for the borough is excessively high considering the uncertain times in which we find ourselves. There are certainly likely to be major changes in population trends and future migration patterns. In considering housing targets GBC should also take proper account of the constraints provided by the Green Belt. Guildford Borough is exceptionally fortunate to have such a large percentage of its area inside the Green Belt particularly being so close to the capital; this should be regarded as an asset to be protected. Indeed it has been estimated that around 57% of the proposed housing in this plan will be built on land now in the Green Belt. It is also worth noting that GBC appears to focus much building in the northeast of the Borough; this land is closest to London and therefore is in most need of protection! Insetting the villages of East and West Horsley from the Green Belt will remove a valuable protection for our countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17111  Respondent: 8940225 / Glen Ruddy  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick's Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a 'special circumstance' and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC's Green Belt & Countryside Report does not address Garlick's Arch, so there is no evidence base to support including this site.
Rather than developing Garlick's Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/882  Respondent: 8940449 / Ben Vessey  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to removal of the villages from green belt status, is a "once and for all" step that will significantly increase the scope for development not just as per the current plan but also in relation to projects in the future.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16039  Respondent: 8941761 / FLGCA (Paul Kassell)  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We object to this policy as inset villages are natural targets for reviewing Green Belt boundaries and directing development towards those villages. Residents would be much less concerned if the current plan did not quote an inflated housebuilding number as “special circumstances” required for changing Green Belt boundaries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1670  Respondent: 8943713 / Janice and Tim Bennett  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Guildford Borough Proposed Submission Local Plan : strategy and sites – June - July 2016 Consultation

Thank you for the opportunity to respond to the Proposed Submission Local Plan.

Green Belt Reduction

I object most strongly to the reduction in Green Belt land both around East and West Horsley and elsewhere in the Borough. The Green Belt was created to provide a green space for city dwellers to recharge their batteries, to separate towns and villages from the city and each other and to preserve the character of rural areas. These reasons are every bit as important today. The National Planning Policy Framework requires any change in Green Belt boundaries to demonstrate very exceptional circumstances. No exceptional circumstances are made for the new Green Belt boundaries.
that will result from proposed insetting of the two parts of the village from the Metropolitan Green Belt. The West Horsley defined Settlement Area boundaries from the 2003 Local Plan do not need to be extended.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17051</th>
<th>Respondent: 8944257 / Bruce Tindale</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td></td>
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<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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</tbody>
</table>

1. I object to building on the Green Belt because the essential characteristic of Green Belt is its openness and permanence (National Planning Policy Framework paragraph 79).

1. I object to all other strategic sites in the Local Plan, Blackwell Farm, 3 Farms Meadows, Garlick’s Arch, West Horsley and Hog’s Back. All are out of proportion to the surrounding area and none qualify for the exceptional circumstances required to take them out of the Green Belt.

2. I object that GBC are contravening the NPPF framework stipulation in paragraph 87 with the proposed developments at Gosden Hill Farm, Ripley, East and West Horsley and Garlicks Arch, Send. Paragraph 87 states “As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.” and GBC have not proven any special circumstance for developing on these Green Belt areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17588</th>
<th>Respondent: 8944737 / Martin Grant Homes</th>
<th>Agent: Barton Willmore (Michael Knott)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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</table>

6.1 Having regard to paragraph the NPPF, it would be appropriate for Policy P2 to refer to the partial or complete redevelopment of previously development sites, as set out in paragraph 89 (6th bullet) of the NPPF. Related to this, DCLG consulted earlier in 2016 on proposed changes to national policy including a proposal to make this policy provision more flexible. Any change to policy should be taken into account prior to submission of the Local Plan or through the Examination process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17221</th>
<th>Respondent: 8944929 / A Jefferies</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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</tbody>
</table>
It is clear from the census that building the majority of new housing on the greenbelt will generate almost double the amount of cars than building housing in the urban area. This is unsustainable and I object to greenbelt housing on air quality grounds.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17232  Respondent: 8944929 / A Jefferies  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the draft plan which proposes over 70% of new housing on the greenbelt. This will ruin the countryside for ever impacting both current and future residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17233  Respondent: 8944929 / A Jefferies  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the insetting of villages from the greenbelt. This is not necessary. There is plenty of suitable land in the urban area which needs to be regenerated rather than left to degrade further.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2726  Respondent: 8944929 / A Jefferies  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

11. I object to policy P2 and the inclusion of Ripley in the list of villages to allow insetting.

12. Policy P2 refers to the Metropolitan green belt yet goes on to create additional green belt in the west of the borough furthest from the metropolitan area. There is no justification whatsoever for new green belt land in Ash as it does not serve to protect the MGB.

19. I object to the fact that policy S2 makes no distinction between previously developed land in the Green Belt. It is clear that the use of a site with no above ground building e.g. A35 has a far greater impact than the use of a site such as Send Prison.

22. I object to the removal in para 4.3.18 of “where it would not have a greater impact on the openness.” and the replacement by “subject to the impact”. This is completely in contravention of the purposes of the green belt.
23. I do not understand why previously developed sites in the green belt have not been included for development. Specifically, HMP Send where the prisoners have been told that they might be moving and indeed the site is understood to have been valued by Savills amongst others. There is no justification for adjustment of green belt boundaries until all other options have been exhausted. Doubtless there are other examples.

38. I object to the fact that greenbelt sites are allocated to improve flexibility in the delivery of the plan. It is clear that the green belt should only be seen as a last resort, after all other opportunities have been fully explored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1892  Respondent: 8945441 / Hazel A. Jarvis  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. The Green Belt should be respected and the development planned on GB land reduced from what is proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2804  Respondent: 8945793 / Helen Bell  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The proposal to build on Green Belt land is wrong. Surely there are sufficient brownfield sites to avoid using up prime Green Belt areas which once lost are gone for ever. Why is it necessary to build even more offices and business premises on such land when we already have a vast number? Surely priority should be given to local residents and their families to live and work in the Guildford area rather than catering for additional people arriving for work who could also wish to eventually reside here. Affordable housing in this area is virtually impossible to find and any new housing can be allocated to anyone on the Guildford Housing List.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8750  Respondent: 8946593 / John & Sheena Preston  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Green Belt and Countryside. The plan takes a cavalier approach to lopping off sections of the green belt. The developments proposed will close the gaps between existing settlements, I recall the previous Government's South East plan where there was proposed to be a minimal gap between Guildford and Woking. Guildford town and environs has always been a 'leafy' environment and the level of development will compromise this aspect.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1515  
Respondent: 8946721 / Fiona Middleton  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I wish to object to the 2016 Guildford plan over a number of issues

1. I object to loss of the green belt
2. I object to insetting of any villages from the green belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1299  
Respondent: 8947457 / Gerry Armstrong  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I would like my original Consultation 19 response, to the Local Plan 2016, to be taken into consideration.

I object to the changes in Policy 2 because they do not reflect the NPPF’s criteria of the Metropolitan Green Belt, its value, importance and permanence.

I object to the new change in paragraph (1) “The Metropolitan Green Belt will continue to be protected as shown designated on the Policies Map, against inappropriate development. In accordance with National planning policy, the construction of new development will be considered inappropriate and will not be permitted unless very special circumstances can be demonstrated.” The words “as shown designated on the Policies Map” should be deleted. The Policies Map has effectively ignored Green Belt protection, therefore the new paragraph (1) is a sham. The Plan states that only 1.6% of the borough’s Green Belt will be lost, however, the 1.6% stated does not include ‘insetting’ of villages, infilling and settlement boundary extensions.

I object to the proposed three “inset” settlements Normandy, Flexford and Walden Cottages in Guildford Borough Proposed Submission Local Plan 2017 Appendix H Maps pg54 Amendments 3-8. GBC has not proved “exceptional circumstance” for their removal from Green Belt. The Green Belt Sensitivity Analysis and The Green Belt & Countryside Study Volume 5 Appendix 1 recognised that H10, H12, H13, H14 and H16, Normandy and Flexford and the surrounding area are of ‘high sensitivity’ fulfilling the essential role of ‘openness’ in preventing urban sprawl and merging settlements. In past appeal decisions by Planning Inspectors all three settlements, Flexford, Normandy and Walden Cottages were recognised as contributing to the “openness” of the Green Belt, therefore all three settlements should remain washed over in Green Belt.

In Green Belt Policy P2 (4.3.13) Normandy, Flexford and 12 other listed villages are now “inset from the Green Belt”. This statement is incorrect, an Inspector has not made that decision and so the villages remain in Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPP16/9368  **Respondent:** 8948385 / Gillian Eve  **Agent:**  

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Policy P2: Green Belt**

I OBJECT. This policy should unequivocally state that the Metropolitan Green Belt will be maintained and protected. That cannot possibly be the intention of this policy given the extent of the proposed loss of Green Belt land to development described in the rest of the proposed local plan.

I OBJECT to the "insetting" of villages from the Green Belt, and at "infilling" within the borough's Green Belt villages. This would lead to a proliferation of development within these villages which would entirely ruin their rural character.

I OBJECT to the unjustifiable proposed changes to the settlement boundaries around East and West Horsley.

I OBJECT to the permitting of "limited infilling". Unless "limited" is defined it will have no meaning and will open the floodgates to filling almost every bit of green space between current dwellings.

I OBJECT to the removal of the site of the former Wisley Airfield from the Green Belt. No exceptional circumstances have been demonstrated.

The policy states that "the general extent of the Green Belt has been retained." This is a misrepresentation.

This policy is based on a flawed Green Belt and Countryside Study.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/16155  **Respondent:** 8948385 / Gillian Eve  **Agent:**  

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

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I OBJECT to the “insetting” of villages from the Green Belt, and at “infilling” within the borough’s Green Belt villages. This would lead to a proliferation of development within these villages which would entirely ruin their rural character.

I OBJECT to the unjustifiable proposed changes to the settlement boundaries around East and West Horsley.

I OBJECT to the permitting of “limited infilling”. Unless “limited” is defined it will have no meaning and will open the floodgates to filling almost every bit of green space between current dwellings.

I OBJECT to the removal of the site of the former Wisley Airfield from the Green Belt. No exceptional circumstances have been demonstrated.

The policy states that “the general extent of the Green Belt has been retained.” This is a misrepresentation.

This policy is based on a flawed Green Belt and Countryside Study.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the insetting of villages.

I OBJECT to the presumption in favour of development in inset villages. The wording of the remainder of the policy is too imprecise to guard against inappropriate development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Policy P2: Green Belt

I OBJECT to the changes, which have not addressed many of the concerns raised about the original Plan, in particular with regard to

- disregard of protection of Green Belt,
- proposed insetting of villages,
- proposed permitting of infilling,
- proposed changes to settlement boundaries
- the use of the flawed Green Belt and Countryside Study

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

1. Failure to Protect the Green Belt from Unnecessary Development

You claim “very special reasons” for putting new housing in the Green Belt but nowhere in the Local Plan is any justification advanced to support your claim. The NPPF and the Planning Inspectorate have made clear that the existence of demand for housing is not ipso facto adequate reason for breaching Green Belt protections. However, despite your evidence base and the NPPF guidance, you have not considered whether the limited availability of development space outside of the Green Belt should in fact restrict the extent of development and constrain the Housing Targets to below the so-called Objectively Assessed Need.
I object to the proposals to ‘inset’ various villages from the Green Belt. This seems to be in reality no more than a bureaucratic device to release land in and around villages for more development without being subject to Green Belt constraints. ‘Insetting’ a village makes no physical difference to its appearance or to its value as open green space separating urban settlements such as Guildford, Woking, and Leatherhead/ Fetcham.

The Local Plan contains insufficient provisions to ensure that all brownfield opportunities within existing settlements are fully exploited before the irreversible sacrifice of Green Belt land for development. The Plan should include much more robust measures to exploit brownfield sites. It should require that all brownfield opportunities across the Borough have been identified and realised before permission is given for any development in the Green Belt.

In the same vein, development (or redevelopment) of any brownfield site for commercial/ business use should not be permitted unless the site is demonstrably unusable for residential development. There is no point in promoting economic development to the detriment of adequate housing provision.

The Local Plan also ignores the evidence you presented in the earlier 2014 SHMAA which showed that some 43% of all existing properties in the Borough are too large (by a margin of two or more bedrooms) for the households occupying them. This suggests that some 20,000 existing housing units in the Borough are oversized and hence inefficiently used, and will be increasingly so as households continue to shrink in size in future. The Local Plan however contains no constructive proposals whatsoever to address the dysfunction in the existing housing stock. For example, planning incentives aimed at homeowners and small builders would encourage oversized dwellings more readily to be subdivided into (or to be replaced by) multiple smaller units. It is likely that many times more ‘windfall’ units could be created in this way than the 625 assumed over the lifetime of the Plan; illustratively, replacing just 10% of the 20,000 oversized existing houses with smaller units more suited to small or elderly households could yield anywhere between 2,000 and 6,000 additional smaller housing units. As these would be brownfield by definition, this would further reduce the need for development in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I strongly object to the proposed removal of West and East Horsley from the green belt. The villages are well into the green Belt, are not adjacent to any non green belt urban areas and it would be incongruous to have Areas of Outstanding Natural Beauty (AONB) within or adjacent to urban areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11660  Respondent: 8953601 / C. Way  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The green belt is being eroded and our beautiful town and countryside spoiled.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8050  Respondent: 8954529 / Maggi Moss  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am opposed to unjustified Green Belt development, it is a valuable asset for the entire community and every effort should be made to preserve it. All parties promised to protect Green Belt in the election and should stand by that.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10263  Respondent: 8954977 / Patrick Sheard  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the proposals to remove a number of the Local Villages from the Green Belt. The Metropolitan Green Belt was established in the 1940s and 1950s to limit the urban sprawl of London and was intended to be permanent. The Local Plan states that 89% of the land area of the Borough is Green Belt, of which getting on for 50% is made up of the Surrey Hills AONB and a further perhaps 15% comprises SSSIs or areas with other sorts of protection. This understandably places pressure on the Council when trying to meet national housing targets, and one of its responses has been to inset a large number of Surrey villages from the Green Belt. Instead of this approach the Council should use its large (largest?) proportion of Green Belt land to argue a special case for a reduced housing target, and indeed I had understood from a public meeting in Send in January this year that they would indeed be pleading this ‘special case’ but no such case appears to have been made. I would also remind the Council that it’s members, almost to a man / woman were elected on promises to protect the Green Belt, whilst once elected they appear to have decided that there are various grades of Green Belt and only some of it needs protection. Guildford Borough Council has not established the special circumstances required to inset these villages form the Greenbelt.
I object in particular to the removal of Send (including Send Marsh and Burnt Common) from the Green Belt. In addition to the above argument Send Parish’s Green Belt forms an essential and substantial buffer which prevents Woking and Guildford becoming a single conurbation. Send Village itself has an open character with two lakes as its geographic heart, and the southern side of the Wey forms a green backdrop to the view from Old Woking and beyond. The Wey Valley itself forms an essential wildlife corridor, a fact which has been recognised by Woking Borough Council in respect of the north bank and this corridor needs to be reflected on the South Bank. The Wey itself is also of historical and cultural significance since it was one of the first rivers to be made navigable by construction of the Wey Navigation. Send is also a long way from the nearest Railway Station(s) and is served by a single hourly Bus Service, its removal from the Green Belt and consequential increased development would, therefore, mean significant increases in vehicle movements and the associated pollution. Send Village must therefore remain in the Green Belt.

Similarly, I object in to the removal of Ripley from the Green Belt. Ripley Village also has an open character with one of the largest village greens in England, and one of the oldest cricket pitches at its heart. The centre of the village itself comprises a Conservation Area which Guildford Borough is considering extending, though the report regarding this extension seems to have been delayed. Again Ripley is a long way from the nearest Railway Station and its removal from the Green Belt and subsequent increased development would, therefore, mean significant increases in car traffic and the consequential pollution. Ripley Village must therefore remain in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15516  Respondent: 8954977 / Patrick Sheard  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. Removal of Villages from the Green Belt

The Society objects to the proposals to remove a number of the Local Villages from the Green Belt. The Metropolitan Green Belt was established in the 1940s and 1950s to limit the urban sprawl of London and was intended to be permanent. The Local Plan states that 89% of the land area of the Borough is Green Belt, of which getting on for 50% is made up of the Surrey Hills AONB and a further perhaps 15% comprises SSSIs or areas with other sorts of protection. This understandably places pressure on the Council when trying to meet national housing targets, and one of its responses has been to inset a large number of Surrey villages from the Green Belt. Instead of this approach the Council should use its large (largest?) proportion of Green Belt land to argue a special case for a reduced housing target, and indeed w had understood from a public meeting in Send in January this year that they would indeed be pleading this ‘special case’ but no such case appears to have been made. The Society would also remind the Council that it’s members, almost to a man / woman were elected on promises to protect the Green Belt, whilst once elected they appear to have decided that there are various grades of Green Belt and only some of it needs protection. Guildford Borough Council has not established the special circumstances required to inset these villages form the Greenbelt.

1. Removal of Send from the Green Belt

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/375  Respondent: 8956481 / A J Thompson  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Since the SHMA is flawed, the 12,426 housing target is excessive. The objectively assessed number should be analysed to a lower figure and the housing target should be further reduced by the application of constraints as required by the NPPPF, in particular the need to protect the Green Belt to which lip service is paid in Polices P1 and P2. I object therefore to the housing target of 12,426 and the consequences that flow from it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6458  Respondent: 8957409 / Horsley Countryside Preservation Society (Roy Proctor)  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy P2- Green Belt

This policy states that Guildford Borough Council (GBC) will continue to protect the Green Belt and we fully support that aim.

In the villages of East and West Horsley the original objectives of the Green Belt continue to be fully met and we disagree with the analysis in the Green Belt and Countryside Study (GBCS) documentation produced by consultants on behalf of GBC which fails to acknowledge the open nature of the area, the large areas of woodland and open space which are integral to the appearance of the area and the low density of housing in the settlement areas.

We object strongly to the proposal to remove the villages from their current status by insetting them from the Green Belt and we do not believe that GBC have demonstrated the exceptional circumstances which are necessary to support such a proposal. The only circumstances that they present are those for increased development, in particular housing, which is unacceptable as a basis even if the proposed development was based on accurate and supportable evidence. As outlined above, this is not the case as the OAN and the SHMA are flawed.

There is also a proposal to change the settlement boundaries for the villages which appears to arise from the GBCS. The reason for changing the boundaries appears to be solely in order to include additional area inside the village boundaries in order to make land available for development. In many of the cases the proposed extended boundary lines are less recognisable in logic and certainly less defensible than the existing ones. We object to these proposals to change the settlement boundaries for East and West Horsley and in addition object to the...
newly designated "identified boundary for the Village" proposed to the south of the A246 in the area of Chalk Lane, The Warren, Rowbarns Way and Green Dene.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** pslp171/1189  **Respondent:** 8957409 / Horsley Countryside Preservation Society (Roy Proctor)

**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Policy P2**

HCPS strongly objects to:

-proposals for new Green Belt boundaries within the Metropolitan Green Belt and "insetting" of several villages from the Green Belt, including the villages of West Horsley and East Horsley. This will give rise to further infilling development potential within the arbitrarily extended villages settlement areas.

- the change in the East Horsley settlement boundary to the south of the A246 [Map entitled Amendment 2: Horseleys-East Horsley (south)].

- the use of an unconstrained OAN figure of 654 homes per annum throughout the rural and urban areas.

- the unsustainable characteristics of proposed development sites A37, A38, A39 and A40. The Proposed Submission Local Plan 2017 consultation documents contain no proposals for provision of infrastructure for the proposed development sites in East and West Horsley.

One of the changes in Policy P2 refers to the Metropolitan Green Belt as "designated on the policies map" where it previously stated "as shown on the proposals map". This change appears to have ignored all previous comments on the proposals to inset villages and translated the insetting proposals into a current status. The previous objections to the fact that the Green Belt including the Surrey villages, and in particular the villages of East and West Horsley, continued to meet the requirements set out for Green Belt designation still stand. The insetting of villages, together with the extension of settlement boundaries, for the purpose of achieving (erroneous) housing targets is inconsistent with national government and GBC declared intent of protecting the Metropolitan Green Belt and does not represent exceptional circumstances.

The proposal to include land to the south of the A246 within the settlement boundary for East Horsley, which increases the settlement area by almost 40%, would not only adversely change the form and character of East Horsley, but runs counter to the proposed Policy D3 to conserve historic environment. The area to the south of the A246 is an example of the equilibrium between the built environment and the natural environment providing an historic asset based around an ancient hollow way through the chalk hills. This is rightly, and historically, outside defined settlement areas.

For West Horsley South, categorised as highly sensitive by the Green Belt Purposes Schedule, the additional lands proposed for removal from the Green Belt will be highly damaging to listed buildings, historic buildings, the conservation area and the overall character of the village.

Development sites A37(WH South) and A40 (WH North) were assessed as unsustainable. No justification was presented for the new boundaries, many of which are not defensible.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
1. I object to policy P2 on the Green Belt and insetting. Under the National Planning Policy Framework (NPPF) housing need alone is not a sufficient justification for changing and encroaching on the Green Belt. GBC have provided no evidence of the exceptional circumstances which could justify the proposed changes. The statement in para 4.3.16 is an opinion not evidence. In particular I object to the insetting of East and West Horsley from the Green Belt, both parishes I know. The decision in paras. 4.3.12 and 4.3.13 that these villages do not make an important contribution to the openness of the Green Belt is simply wrong. Have any of the planners or GBC councillors ever walked the Horsley Jubilee Trail?

2. At present both villages have distinctive characters, East Horsley was developed in the 1920's/30's as a rural garden village and has retained that character, particularly leafiness. The large gardens and valued open spaces in East Horsley create both a haven and corridor for wildlife and a source of biodiversity. West Horsley is characterised by its openness and historic setting with fields, hedgerows, woods and large gardens again providing an environment for wildlife and a rich biodiversity.

3. This biodiversity has been documented: for the area of the two parishes there are records of 8 species of reptiles and amphibians, 24 species of mammals, 38 species of butterflies, 18 species of dragonflies and damselflies, 12 species of orchids, 275 species of moths and 95 species of birds. Of the total 2 are Specially Protected, 20 are Biodiversity Action Plan Priority Species, 21 are on Schedule 5 of the Wildlife and Countryside Act and 7 are on Schedule 1, while 25 are on Red Lists of Conservation Concern, plus the badger which has its own Protection Act (details for East Horsley on the neighbourhood plan evidence base)

4. The insetting of the villages will inevitably lead to a greater density of housing with increased pressure from people and their pets and less green space. This will worsen the impact of the proposed additional new houses, which in West Horsley at 35% of the existing number is hugely disproportionate. This will have a damaging impact on the wildlife and the area’s biodiversity contrary to the National Planning Policy Guidance.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The University broadly supports the policy and notes that the Green Belt boundaries can be viewed on the “Proposals map”, although this should be clarified as being visible on the “Policies map”.

The Policies map confirms that Blackwell Farm is a site allocation, through Policy A26, that falls within the Urban Area outside of the Green Belt.

The University makes comments on the other allocated sites as appropriate in its responses to the relevant policies of the plan.

The University agrees that there are exceptional circumstances to alter the green belt boundary to provide for development needs and promote sustainable patterns of development. However, it considers that paragraphs 4.3.16 – 4.3.17, which provide background to Policy P2 regarding the green belt, should provide more details about the exceptional circumstances to alter the green belt boundary to bring more land into the green belt area in the vicinity of Ash and Tongham.

**Exceptional circumstances**

The University agrees with the statement in paragraph 4.3.16 regarding exceptional circumstances to justify the alteration of green belt boundaries in the local plan.

At a plan-wide level there is a combination of factors, including a particularly high level of housing need exacerbated by a significant backlog of unmet need and the lack of suitable alternative land, that together comprise exceptional circumstances. The University considers that these factors exist in Guildford and the extent of these circumstances is clearly well beyond the ordinary.

In this context the University firmly believes that the allocation of land at Blackwell Farm fits well with the exceptional circumstances. It is large enough to provide a significant number of new homes and associated services and facilities, as well as to fund new infrastructure and improvements to existing infrastructure that will benefit the town.

In particular it lies adjacent to the existing large cluster of employment, services and facilities on the western side of the town leading to a strong likelihood that sustainable modes of travel will be used by new residents to access the existing employment opportunities, services and facilities as well as those to be provided on site.

The Blackwell Farm site is integrated with the western end of the town’s proposed sustainable movement corridor which further emphasises the ability of the site to provide new residents with realistic opportunities to walk, cycle or use public transport to go about their daily lives.

The successful Surrey Research Park is a major asset to Guildford’s economy but is now almost full as the last available development plots are either reserved or an option for expansion of satellite technology or are being developed. Policy A26 provides potential for an extension to the Park to build on its economic success, which has been and continues to be an important element of the growth and prosperity that Guildford enjoys and will continue to enjoy with this extension. The ability to extend the Park is an important factor in support of the allocation of Blackwell Farm.

In addition, the University itself is a major asset to the town and borough, not just educationally and economically but also through the cultural, sporting and social opportunities and facilities it provides. Given that Blackwell Farm is owned outright by the University, there is an opportunity to generate returns for the University in a constrained funding environment, which will allow the University to reinvest receipts in maintaining, renewing and adding to its facilities including academic buildings, residences and mixed use service facilities on campus as well as support scholarship involved in research, teaching and innovation and hence in the town.

The University’s sole ownership of the site is also an advantage in bringing the site forward for delivery of homes. This sole ownership provides greater confidence of delivery. The University is also a world class Guildford institution, rooted in the town and the borough, with a significant stake in the future of Guildford.

The University intends to retain control over the development and the land, providing long term stewardship, and acting as a trusted custodian of the land and the homes it will deliver, to control quality and future management of the site.
The University considers that the need to extend the Metropolitan Green Belt to prevent Ash Green coalescing with Ash and Tongham seems rather less than exceptional. The plan should explain further why there are deemed to be exceptional circumstances to justify this extension.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/17349  **Respondent:** 8971137 / Woolf Bond Planning (Thomas Rumble)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

The Plan includes provision of considerable land in the Green Belt to be used for Suitable Alternative Natural Greenspace purposes. Our clients control land at Cricketts Hill Farm, Wyke for this purpose (location plan attached). It is within a short walking distance of the proposed strategic site and will meet the SANG tests applied by Natural England.

We propose that Policy P2 includes some wording that confirms that the use of land in the Green Belt for SANG purposes will be supported on the basis that this is an appropriate facility for outdoor recreation purposes.

**Proposed Change:**

Additional wording to confirm that the use of land in the Green Belt for SANG purposes will be supported and the identification of the site on the Proposals Map for SANG purposes.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/7298  **Respondent:** 8971233 / Tim J. Harrold  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

1. Introduction

CPRE Surrey Guildford District welcomes this opportunity to make this submission concerning the draft local plan. CPRE has the third largest county membership in the country and

Guildford and Waverley are its two biggest CPRE Districts in Surrey. CPRE is an Advisory Board Member of the Surrey Hills AONB Partnership and also chairs the Surrey Aviation Group. On both a national and local scale, CPRE has had extensive experience over many years in shaping and interpreting planning policy.

1. Background to this Submission

CPRE is concerned at the uncertain background to this GBC consultation which has been characterised by a number of executive and officer changes and also overshadowed by the recent EU referendum with its as yet unpredictable political and economic outcome. It is not possible, for example, at this time to estimate what impact this might have on inward migration. We are dismayed about the inclusion in the draft Local Plan of so many Green Belt development sites which are considered necessary by GBC if they are to meet the unrealistic 'Objectively Assessed Need' (OAN) figure of 693 houses per annum (SHMA). What is required instead is a more careful consideration of the many widespread and serious constraints on development within the Borough, and the need to protect and enhance the countryside adjacent to and
around the town of Guildford and its villages, rather than undermining this valued resource through the proposal of urban extensions and over large housing sites.

CPRE does not agree that this consultation should be made under Regulation 19 as a number of wholly new items, which we have indicated in this document, have not been consulted upon under Regulation 18. Additionally, many proposals for policy and development sites have not been able to be assessed fully for consultation as the necessary detail for them is absent.

Furthermore, some of the 'evidence' in the Pegasus Report on the countryside has not been corrected, and has been used in a subjective quality assessment of the Green Belt to justify recommendations for changing boundaries that do not stand up to detailed examination. We have given an example of this in connection with the Blackwell Farm proposal (page 17).

CPRE has had to select only those sections of the draft Local Plan for comment which are primarily concerned with the countryside as the 6 week period for consultation is too short a time to deal with all the material available for study. We have therefore had to concentrate on those omissions and assumptions made about the borough that we consider need to be reviewed more completely in depth.

1. Fundamental Overall Objection

(i) Green Belt and AONB

It has been made clear by the Government that they remain committed to protection of the rural environment. When asked to comment on the National Planning Policy Framework, the Minister of State for Housing & Planning Brandon Lewis MP made the following declaration in a letter dated 10th June 2016 to Richard Knox "ohnston, Chairman of the London Green Belt Council:

"The Framework makes it clear that inappropriate development may be allowed only where very special circumstances exist and that Green Belt boundaries should be adjusted only in exceptional circumstances through the Local Plan process and with the support of Local people. We have repeatedly made clear that demand for housing alone will not change Green Belt boundaries."

This clear policy statement is not reflected in the draft Guildford Local Plan which calls for housing development not only on a number of sites in the AONB and the AGLV but also encroaches on the Green Belt in a wide range of other locations. CPRE maintains that this is a misguided approach and renders the current proposal unsound. CPRE OBJECTION.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY P2: Green Belt

CPRE objects to the way in which the draft Local Plan proposes to allow development of the Green Belt which has been so successful in protecting Surrey's countryside from urban sprawl and suburban encroachment. It is our view that the general public in Guildford regard it as part of their heritage and that this policy should express more clearly its positive support for the role it plays in maintaining openness from development.

The NPPF states clearly in Chapter 9 that it attaches great importance to Green Belts and that "the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence."
Paragraph 80 of the NPPF reads as follows: "Green Belt serves five purposes:

+ to check the unrestricted sprawl of large built-up areas;
+ to prevent neighbouring towns merging into one another;
+ to assist in safeguarding the countryside from encroachment;
+ to preserve the setting and special character of historic towns;
+ and to assist in urban regeneration, by encouraging the recycling of derelict and other urban land."

The draft Guildford Local Plan is in conflict with this list of the five purposes of the Green Belt, and also seeks to challenge the fundamental aim of Green Belt policy which is to prevent urban sprawl by keeping land permanently open. CPRE OBJECTION.

Paragraph 14 makes clear that "the presumption in favour of sustainable development" is to be limited where "specific policies in the framework indicate development should be restricted". These policies are listed in Footnote 9 to Paragraph 14 and include sites protected under the Birds & Habitats Directives, Sites of Special Scientific Interest, land designated as Green Belt, Areas of Outstanding Natural Beauty, Local Green Space, designated heritage sites and locations at risk of flooding. All of these categories apply to the Guildford District. Constraints should be taken into account in the Housing Need Figure (OAN) and the figure of the Housing Target in the draft Local Plan lowered accordingly.

Paragraph 83 states that "once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan" which is of course the process with which we are now concerned. CPRE maintains that "exceptional circumstances" is a far stronger requirement than the "very special circumstances" referred to in Paragraphs 87 and 88 when considering regular planning applications as to whether they are appropriate or not. The definition of "exceptional" is much more specific and relates to rare occasions which are outside normal policy planning process. "Exceptional circumstances" have to be regarded as not the norm. They are to be characterised as unique and permanent, and the opposite of required general practice which is concerned with planning interpretation and implementation for specific applications. That is one of the reasons that a boundary change can only be considered when a new plan is being prepared and discussed.

It follows that a boundary review of the Green Belt is a unique and rare occurrence which is "exceptional". The draft Local Plan, however, seeks to make numerous boundary reviews of the Green Belt in many different Guildford borough locations at one time, which clearly infringes the permanence rule which applies to the Green Belt designation. Moreover, the Guildford Borough Local Plan which was adopted in January 2003 agreed to a major change in the Green Belt boundary when the University of Guildford Manor Park campus was permitted. It is clear to us that it was not intended that any further changes to this permanent boundary would be allowed a few years later at a subsequent Local Plan. We maintain that this renders the proposed draft Plan unsound because it follows an incorrect policy approach. CPRE OBJECTION.

We also do not accept the arbitrary way in which the Pegasus Study has concluded that Green Belt sites which fulfil only 2 of their 4 "purpose assessment tests" are categorised as only of "medium sensitivity" and therefore available for possible development should they meet other policy requirements. This is a fundamentally flawed policy approach which is designed to accelerate erosion of the Green Belt in a totally unacceptable manner for the purposes of housing development and will result in urban sprawl encroaching onto open countryside. CPRE OBJECTION.

CPRE is additionally concerned about how Paragraph 85 of the NPPF should be interpreted with its reference to "defining boundaries" and "safeguarded land between the urban area and the Green Belt". We support the concept of villages being "washed over" by the Green Belt as part of the approach to be followed in Guildford but its our impression that the term "safeguarded" is rather the opposite of its normal dictionary definition when it comes to the long term permanent protection of the Green Belt. Nor do we agree with the use of "insetting" in sensitive locations such as at Mount Browne and the University of Law in Artington PC which are within both the Green Belt and the Surrey Hills AONB, or its use in a policy change which will effectively remove 14 villages from any real Green Belt protection. It is important that Local PCs can reach decisions regarding the openness of their village communities rather than have to
accept a centralised judgement on this issue. This extra element in influencing local decision-making is undesirable. CPRE OBJECTION.

Guildford has a Parish Council heritage with a well informed knowledge of the countryside in its local areas. We believe that as the Minister states "local people" will and should be making decisions about the numerous changes proposed in the draft Guildford Plan as regards the settlement boundaries in their communities and not being advised of this "from a distance" which avoids the use of fully informed local input. Changes as well to conservation area boundaries are a sensitive matter that needs careful local attention. Elsewhere in this document, we have referred in addition to the interpretation of draft Policy H3 regarding Rural Exception Homes which we find not tightly defined sufficiently.

It is important that Guildford and its neighbouring communities do not merge into one another through the steady erosion of the Green Belt in the way proposed in the draft Local Plan now under consultation. They should rather be encouraged and seek to retain their separate character, identity and setting. It is essential that these elements of planning are recognised and supported by GBC rather than allowed to be undermined bit by bit. The green gaps between villages should be retained and not succumb to linear "ribbon" development along roads and railway lines. The green approaches to Guildford's villages, such as for example Effingham, should be protected so that they remain as far as still possible distinct from their neighbouring communities at Bookham and East Horsley. CPRE objects to the way in which Guildford also is in danger throughout draft Local Plan of merging into neighbouring towns such as Godalming. The constant unbalanced emphasis on economic growth will harm the countryside that so many residents and visitors value and cherish. CPRE OBJECTION.

CPRE objects to the continued reliance on the "evidence" in the Pegasus Report for the new draft Local Plan which was shown to be inaccurate in many aspects during an earlier consultation process to which the public expressed their objection in large numbers. We deplore the way in which value judgements made for this discredited report - which has not been changed - are being used for the "traffic light", evaluation of 4 of the 5 Green Belt purposes listed above. We object to this method of approach using these often misinformed evaluations which define the sensitivity value of the Green Belt into the 3 categories of Red, Yellow and Green. This is an unacceptable basis upon which to justify a wide range of Green Belt boundary revisions which cannot be considered adequate for the draft Local Plan with its "exceptional circumstances" requirement. It deliberately ignores the NPPF policy which emphasises the importance of the Metropolitan Green Belt and its permanent nature. The policy also makes clear that its boundaries are designated to prevent urban sprawl by protecting openness. The boundaries of the Green Belt were established for this purpose and are as valid now as they were when first introduced. They were not intended to be altered by an onslaught of changes each time a Local Plan was brought forward for consideration. CPRE therefore objects most strongly to this proposal and believes that the draft Local Plan has to be considered unsound on these grounds. "Exceptional circumstances" by their definition do not encompass a multiplicity of changes along the lines envisaged. CPRE OBJECTION.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I feel that this is an insufficient explanation of what is happening. There is no adequate description for example as to the decision process whereby some villages continue to be “washed over” with Green Belt and some not. Nor is it apparent how such a major change can be introduced arbitrarily in this way when NPPF clearly indicates that the characteristics of the Green Belt are its permanence and its openness. We know that NPPF policy states that changes to a Green Belt boundary have to be made at the time of a consultation on a Local Plan and will only be justified in exceptional circumstances. What is not clear is whether so many changes can be justified at one time and whether legitimate “exceptional circumstances” apply on the grounds that the Green Belt is preventing inappropriate development. Surely, this is exactly what it is supposed to be doing. What we are being asked to accept is that because some parts of a village have been built-up in the past then this should be allowed to extend onto additional open areas of the village settlement which Green Belt policy maintains should be kept open.

The Introduction to Policy P2 states in paragraph 4.3.13 on page 48 that:

“The following villages are now inset from the Green Belt: Chilworth, East Horsley, Effingham, Fairlands, Flexford, Jacobs Well, Normandy, Peasmarsh, Ripley, Send, Send Marsh/Burnt Common, Shalford, West Horsley and Wood Street Village”.

In addition paragraph 4.3.15 lists a number of major previously developed sites which are also to be inset from the Green Belt which include the two nationally important AONB sites at Mount Browne and the University of Law, a decision which is subject to objection by Artington PC and CPRE.

Paragraph 4.3.17 also refers to the fact that land at the former Wisley Airfield has been inset as well and will therefore be removed from the Green Belt. CPRE has lodged an overall objection to this development which we consider falls into a totally different category as a strategic site.

It seems apparent that insetting is being used in a number of different areas to change Green Belt boundaries in villages, urban locations, strategic sites and major existing developments such as the Henley Business Park, HM Prison at Send, Pirbright Barracks and the Pirbright Institute.

The way in which this topic has been announced hardly suggests that this is still a matter for consultation as we are told that Regulation 19 now applies. However, we maintain that there has been insufficient transparency on this matter because of how the draft Local Plan has been edited, and that clarity of presentation on this new policy has not been handled adequately.

CPRE has had to spend some time finding the relevant policy references and considers that they are not clearly laid out for easy comprehension as one would normally expect for a policy change of considerable impact and importance. This is a major issue as the failure to clarify the policy in one place in the draft Local Plan will serve to deter investigation and/or understanding by those communities most involved owing to the difficulty of locating all the relevant text concerned.

Surprisingly, one has to turn to paragraph 4.5.50 in Policy D4 on page 106 to obtain further information relating to insetting and the policy which is to be followed in this context in urban and inset village areas. This states that 15 villages are to be affected.

A provisional decision has apparently been made that these villages do not qualify in terms of openness to remain in the Green Belt. This will mean that the Green Belt boundary will have to be amended in no less than 15 communities. However, it is unclear if or when this issue was discussed with Parish Councils and how far Local People in the villages concerned have been involved in the consideration of this decision. Furthermore, so many changes to the Green Belt boundary at one time hardly qualify to be justifiable under “exceptional circumstances” since 15 different individual sites are involved. We also question whether “openness” should be the only consideration to take into account when Green Belt has no less than five other purposes that ought to be met.

It is our concern that the justification for removing villages from being washed over by the Green Belt boils down to a desire to increase development which would formally have been considered “inappropriate” because other unspecified development management policies will apply that are less effective and robust. We are not convinced that many of the villages concerned would welcome this approach. If this proposal were to go ahead, it has been reported that no less than 105 kilometres of new Green Belt boundary would be involved.
We also have serious reservations as to whether these proposed changes stand up to closer examination. We assume that this proposal is based on the “evidence” given in the revised version of volume 4 of the Pegasus Green Belt & Countryside Study upon which we are reluctant to place much weight. We do not have confidence in the “evidence” that this document contains. We also note that an attempt is being made to increase the settlement boundaries of several villages without clarifying clearly what is being done.

So let us have a look at a few examples of what is proposed.

I know Effingham well and am familiar with its Conservation Area and the open land at the King George V playing fields, Browns Field, Effingham Golf Club, Effingham Lodge Farm and Effingham Common. All of these areas are distinguished by their openness as is the land beyond the Little Bookham boundary adjacent to Manor House School. Land to the South of Effingham also includes open countryside. I am not clear whether it is acceptable for Guildford to make changes in the Green Belt at Effingham without first advising Mole Valley Council of what they intend to do just over the borough boundary. It is a community which is already in danger of merging with the villages of Little Bookham and East Horsley through linear development along the A246 and the Lower Road. Surely, we do not wish to weaken the protection afforded by the “washed” over Green Belt provision in the circumstances we have described.

It is easy to point out the openness of the villages of Flexford/Normandy, and the Horsleys as they are today. The problem relates to the inappropriate development that is proposed in the draft Local Plan which is determined to force through what we consider incipient urban sprawl in these communities and transform their current rural environment. This will require an extensive boundary review for the Green Belt to take place so that they can absorb more housing. CPRE has already objected to this elsewhere with respect to these sites. The draft Local Plan is not acceptable because it is seeking to undermine the long established implementation of successful Green Belt policy.

Moreover, we are aware of numerous amendments which have been surreptitiously made to settlement boundaries in order to facilitate further building development for the draft Local Plan. We do not consider that these changes have been made in such a manner that they will be immediately understood by the public because they are not easily “transparent” in the information available.

It seems to us that the draft Local Plan as it stands is unsound because it is based on too high an “Objectively Assessed Need” (OAN) figure for housing, a refusal to deduct constraints, and it consciously seeks to undermine the Green Belt to facilitate the unrealistic achievement of reaching this target. CPRE believes in the value of the Green Belt which it is determined to defend and accordingly adds this objection to the others it has submitted already. We consider that what we have discussed in this letter and the other submissions we have made amounts quite simply to bad planning.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14018  Respondent: 8974177 / Nigel Mitchell  Agent:
Document:   Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Local Plan makes great store by the fact that only 1.6% of green belt land is being used for new development. This is not true for the following reasons

- 89% of the borough is Green Belt
- 49% of the borough is within the Area of Outstanding Natural Beauty which cannot be developed under current
- Villages that were included within the green belt have been removed from it, this area is not quantified in the
- The 6% of Green Belt proposed for development relates to the remaining land within the Green Belt and is therefore 4% of Green Belt land.
- The area that is being developed could be better quantified as 50 football pitches or the equivalent of 5 Stoke Park’s.
For all the above reasons the 1.6% stated within the document is misleading in the extreme.

Support

This policy needs to recognise that the joining of Guildford with surrounding boroughs must be strongly and strenuously avoided.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
"When drawing up or reviewing Green Belt boundaries LPAs should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary" (para. 84).

The NPPF goes on to say that LPAs should:

"satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period" and "define boundaries clearly, using physical features that are readily recognisable and likely to be permanent” (para. 85).

We agree with the Council’s conclusion that development in and around Guildford’s largest towns will not provide the land needed to meet its OAN. We note that Policy P2, when taken with the policies map and site allocations, establishes the principle of the need for Green Belt release and identifies the areas where it may be appropriate to do so.

We note the review process that the Council has undertaken, through its Green Belt and Countryside Study (GBCS). We do not believe that the additional information produced by the Council since the Draft Local Plan (2014) justifies the changes to site allocations, particularly the removal of the Effingham Sites (Site Allocation 69) which were included in the previous draft. The Sustainability Appraisal inappropriately fails to test the full range of alternative school strategies. We remain of the view that the evidence suggests that the Effingham allocation (Site Allocation 69) was an appropriate Green Belt release and continues to be supported by the Council’s evidence base. When compared with the assessment of the sites now proposed, we regard the revised approach to allocations as inconsistent and not justified against reasonable alternatives.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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The Development in Normandy is on the Green Belt, if I understand correctly, the exceptional circumstance that allows the destruction of the Green Belt is the proposal to build a New Secondary School to meet a supposed unmet need.

The Green Belt in Normandy and the surrounding area is serving its purpose well.

To the West, Camberley, Farnborough, Aldershot, Ash, Tongham and Farnham are effectively one area or urbanisation, only the road signs tell you have moved from one town to the next.

Currently it is the green belt round Normandy & Pirbright that is stopping this conurbation merging with Guildford & Woking in the east.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Sustainability versus Sensitivity, the local plan picks and chooses whether to separate Flexford and Normandy or separate Flexford and Normandy to try and justify the plan. Clearly this is not appropriate

The Development in Normandy is on the Green Belt, if I understand correctly, the exceptional circumstance that allows the destruction of the Green Belt is the proposal to build a New Secondary School which is not needed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<th>Comment ID: PSLPP16/15971</th>
<th>Respondent: 9007457 / Belinda Baker</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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</table>

Houses should not be on the green belt

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/5059</th>
<th>Respondent: 9009025 / Peter Elliott</th>
<th>Agent:</th>
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I have written to the local government ombudsman to complain about how the new Guildford local plan is such a complete betrayal of your party's headline election pledge 'The Green Belt Stays'

He has written back, saying that I am required to write to you first. The grossly misleading nature of your party's election pledge had the effect of deceiving Conservative voters into thinking that they were voting for a party that was going to protect the Green Belt, not build thousands of houses all over it, and consequently they were cheated out of having a vote on the most important local issue for many years, whether or not they wanted mass development on the Green Belt.

This means that there is no legitimate democratic mandate for the local plan. There is, however, a simple and cost-free answer to all this, which could possibly provide you with a legitimate mandate for your plan, and win back some respect for your party.

You could first of all issue a prominent apology to your voters for having so misled them, and when the referendum for the elected mayor comes up, question one on the ballot paper could read 'Do you want an elected mayor?' and question two 'Do you want large scale development on the Green Belt?'

This may be unorthodox, but a serious deception has been perpetrated on the Conservative voters of Guildford, and this would put it right.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
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This means that there is no legitimate democratic mandate for the local plan. There is, however, a simple and cost-free answer to all this, which could possibly provide you with a legitimate mandate for your plan, and win back some respect for your party.

You could first of all issue a prominent apology to your voters for having so misled them, and when the referendum for the elected mayor comes up, question one on the ballot paper could read 'Do you want an elected mayor?' and question two 'Do you want large scale development on the Green Belt?'

This may be unorthodox, but a serious deception has been perpetrated on the Conservative voters of Guildford, and this would put it right.
I would like to object strongly to the new local plan for several reasons.

Firstly, and most importantly, there is no democratic mandate for mass development on the Green Belt. The Conservative party fought and won the local election with the headline pledge 'The Green Belt Stays'. Conservative voters were thereby deceived into thinking that they were voting for a party that was going to protect the Green Belt, not build thousands of houses all over it, and were consequently cheated out of having a vote on the most important local issue in a generation, whether or not they wanted mass development on the Green Belt. I have reported this electoral fraud to the Nolan Committee on standards in public life.

Despite this, some 20,000 people, who remembered that the Conservatives had reneged on promises to protect the Green Belt before, voted against the first version of the local plan, [which is largely the same as the present plan], and voted for the Guildford Green Belt Group.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the lack of democratic mandate, due to the fact that the Conservative councillors misled the voters by a headline pledge to protect the Green Belt, therefore taking votes away from the new Guildford Green Belt party. Once voted in they immediately reneged on this.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPP16/10762  **Respondent:** 9025025 / Kate Millington  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I write to object to GBC’s proposal to remove Green Belt protection from a number of villages in the Guildford area including my village Chilworth. I find it astounding that it is even being considered. Focus should be on existing brown land areas around the Guildford area that are in need of improvement and are better placed to offer affordable housing and accessibility.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPP16/4129  **Respondent:** 9025249 / Y Hofner  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the removal of Chilworth from the Green Belt. I find it difficult to understand why the village of Chilworth is to be removed from the Green Belt when other villages in the Tillingbourne valley, i.e. Albury, Shere, Gomshall and Abinger, are not to be removed.

In the St. Martha Parish of Chilworth, most of the land is in an area of outstanding natural beauty. Is it also intended to take this out of the Green Belt?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPP16/6455  **Respondent:** 9025633 / D. Yardley  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

In response to your letter of 2 June, we understand that it is proposed to remove the villages of Chilworth, Peasmarsh and Shalford from the Green Belt and we would certainly oppose this as all three villages on their boundary road signs state that they are in the Surrey Hills
With regard to Chilworth the Borough has designated several conservation areas close to the historic gunpowder mill wood, a heritage site owned by the borough observes reckon that ten thousand visitors a year walk or cycle through this site, many not local, and the continuation of the Green Belt is vital.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/15952  **Respondent:** 9042049 / Victoria Sandu  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the insetting of the villages of Send, Send Marsh / Burnt Common and Ripley and their resulting removal from the Green Belt. The NPPF (paragraph 80) sets out five main purposes of the Green Belt, including:

- To check the unrestricted sprawl of large built-up areas,
- To prevent neighbouring towns merging into one another,
- To assist in safeguarding the countryside from encroachment

The three villages of Send, Send Marsh / Burnt Common and Ripley both together and including the green spaces in between ensures that there is a buffer against the towns of Guildford and Woking becoming one continuous conurbation. The insetting of these villages would make it far easier to make future developments in and around these villages, thereby making the future merging of Woking and Guildford conurbations more likely, and thereby going against the main reasons for having the Green Belt in the first place. There are no obvious special circumstances given in the Local Plan to justify removing this restriction.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/8117  **Respondent:** 9042753 / Julia Trinick  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Wood Street Village being inset from the Greenbelt. We are very close to Guildford and need the protection that the Greenbelt gives us

i.e. Wood Street Village gives open space to Greenbelt and acts as a buffer to urban sprawl to prevent Wood Street from being absorbed into Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/6862  **Respondent:** 9047265 / Clare Hewlett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
• I object to the removal of West and East Horsley from the Green Belt as this will inevitably lead to the total destruction of the special character of these villages as they are developed to become dormitories for Guildford and Greater London. The Green Belt was designed to safeguard against this.
• No exceptional circumstances have been identified to justify the wholesale removal of many villages from the Green Belt. Indeed, our MP, Sir Paul Beresford received confirmation of the Government’s position from the Parliamentary Under Secretary for State (Planning) - “the National Planning Policy Framework makes it clear that most development in the Green Belt is inappropriate.....unmet housing need is unlikely to outweigh harm to the Green Belt and thus constitute the very special circumstances justifying inappropriate development within the Green Belt”.
• No case has been made for siting large numbers of new homes within West Horsley, which will totally destroy its rural character.
• The National Trust opposes the removal of West Horsley from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6865  Respondent: 9047265 / Clare Hewlett  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

• I object that such a large area of the Green Belt is to be destroyed by the removal of its protection from so many villages. Surrey should not become a large dormitory for Greater London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9075  Respondent: 9049697 / Simon Harris  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am representing St Mary’s Church, West Horsley, which has two adjacent properties at 80 East lane, West Horsley, KT24 6LQ These are St Mary’s Daughter Church, which you will see from Surrey Interactive has an ‘L’ shaped plot, and the adjacent Rectory (which itself borders farmland on its other side). (The two plots can also be seen on Site Allocation/ Policy A41 and the map on Page 218 Of the Proposed new Local Plan For some while the Church has had internal discussions regarding ways to improve its facilities and planning for the future has become increasingly important as the Church grows and the influx of new residents into ‘The Horsley’s’ is set to significantly increase. So far, we have not reached any firm conclusions as to what we would like to do, but some form of improvement or redevelopment of the East Lane facilities is still high on our agenda for consideration. If any subsequent proposals required planning or any other consents, then all normal procedures would be followed For the time being however, we would be most grateful for your clarification and help. If you take the two properties together, they form a sizeable, almost square plot made up of the Rectory bounded on two sides by the ‘L’ shaped land upon which the Daughter Church sits. However, we have recently viewed a map which shows the new Settlement Boundary as part of the new Local Plan and it would appear that the bottom half of the Daughter Church land (i.e. the portion that runs along the back of both the Daughter Church and the adjacent Rectory) seems to be outside the proposed new Settlement Boundary. If this is the case, it could very significantly restrict our ideas in terms of improving the Church’s facilities; which of course are not only important for the Church members, but also the local community as a whole We would really appreciate it if you could look into this
for us and confirm whether this is the case or not. If we are correct, then we would like to formally request as part of this consultation process please that this portion of our land is brought within the new proposed Settlement Boundary. If there is then a formal application process that we need to embark upon to achieve this, then please advise us and we would be pleased to follow your procedures.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/9478  **Respondent:** 9049889 / Patrick Armitage  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object to removing East and West Horsley from the Green Belt.

The Green Belt was created to prevent urban sprawl, it is a precious resource which provides an ecosystem for numerous creatures and helps combat pollution. Furthermore by removing East and West Horsley from the Green Belt would change the nature of the area forever and be lost to future generations.

Under The National Planning Policy Framework requirements housing, education needs are NOT an exceptional circumstance. Under no circumstances should green belt land be used for housing or educational buildings.

I hereby respectfully request Guildford Borough Council to revise the current proposed housing number, and to amend the Local Plan to utilise brownfield and or previously used land rather than green field sites within the Borough.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/8670  **Respondent:** 9050337 / Nigel Geary  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

Local Plan Policy P2 states that: *We will continue to protect the Metropolitan Green Belt.* I fully and un-equivocally support this policy.

Unfortunately, despite such brave words, GBC appears to be in breach of this policy itself through the housing policies that it has set out in the Local Plan

Under NPPF rules, GBC is permitted to make allowance for factors which may constrain the delivery of new housing, such as the need to protect the Metropolitan Green Belt or the restrictions required to protect the Surrey Hills Area of Outstanding Natural Beauty (‘AONB’) which is offered protection under the NPPF comparable to that of a national park. Although these areas make up a large proportion of the land area of Guildford Borough, GBC makes no attempt to reduce its housing delivery in order to take account of such constraints. We find this approach inexplicable.

There are also a number of further issues relating to the detailed implementation of this policy which are set out further below:

a) Paragraph 4.3.13: Proposal to inset East Horsley from the Green Belt
Policy P2 proposes that East Horsley should be inset from the Green Belt, instead of being ‘washed over’ as it is today. Currently development is permitted within the settlement boundary, although this area is still considered to be Green Belt with a particular planning regime being applicable.

East Horsley is set in a rural location and the village has the look and feel of a rural village. Its Green Belt status has been a key factor in preserving that character. Moreover, being ‘washed over’ by the Green Belt has not been a serious constraint on development within the village. For example, GBC’s planning records indicate that no less than 149 net new homes were added to the village housing stock through in-filling and brownfield developments between 2000 and 2015.

GBC attributes the need to inset East Horsley to NPPF requirements, arguing that the test for remaining ‘washed over’ is that the village should make an important contribution to the openness of the Green Belt. This East Horsley clearly does. No less than 36% of East Horsley is composed of woodlands, whilst inside the settlement area there is an average housing density of just 8.1 dwellings per hectare (‘dph’). Woodlands and large residential gardens make a vital contribution towards bio-diversity, provide wildlife corridors, and furnish those open spaces which are vital to the character of the greenbelt. It is one thing for a planner to study a map and see a settlement area filled with housing, but it is quite another actually to come to a rural village like East Horsley and see how the Green Belt has preserved the rural character and openness of this village.

Today East Horsley is a picturesque and flourishing rural community, which has and continues to experience steady incremental growth as a result of being ‘washed over’ by the Green Belt.

I therefore object to the proposal to inset East Horsley from the Green Belt and requests that this proposal be dropped from the Local Plan.

b) Paragraph 4.3.16 and Proposals Map: Settlement Boundary changes in East Horsley

GBC are proposing to make a number of changes to the settlement boundaries of East Horsley and so expand the settlement area, as set out in the Proposals Map, with the justifications seemingly provided in the Green Belt & Countryside Study prepared by the consultants, Pegasus.

I object to two specific boundary changes, which have been proposed, as follows:

1. There is a proposal to move the East Horsley settlement boundary westwards from behind the houses on the west side of Ockham Road North up to the eastern boundary of Lollesworth. This proposal removes over 5 hectares of agricultural fields from the Green Belt. The present boundary line is clearly defined by a deep and well-maintained drainage ditch which is classified by the Environment Agency as a ‘main river line’ and therefore represents a highly defensible Green Belt boundary.

Moving this boundary west to the edge of woodland in no way improves its defensibility. Under NPPF rules Green Belt boundaries should only be changed in ‘exceptional circumstances’. We do not believe this proposal can be considered as an exceptional circumstance. Clearly the only justification for this change is to bring a large agricultural field within the settlement area in order to provide more housing land. However, under NPPF rules this is not a sufficient justification for changing a Green Belt boundary. As such, we believe it is an invalid proposal.

I object to this proposed boundary change.

1. There is also a proposal to move the East Horsley settlement boundary westwards from behind the houses on the west side of Kingston Avenue up to a tree line running along the Parish Boundary at the western edge of Kingston Meadows. The result is to take all of Kingston Meadows out of the Green belt.

Kingston Meadows is the main public recreational space of East Horsley, comprising various sports facilities and playing fields. The present settlement boundary is clearly defined by a deep and well-maintained drainage ditch running along its eastern side. It therefore represents a very defensible Green Belt boundary. Moving this boundary westwards to the edge of woodland in no way improves its defensibility. Under NPPF rules Green Belt boundaries should only be changed in ‘exceptional circumstances’. We do not believe that this can be considered as an exceptional circumstance. As such we believe this is an invalid proposal.
I object to this proposed boundary change.

In the Green Belt & Countryside Study and its accompanying Topic Paper, GBC justifies the need to make changes in settlement boundaries in order to meet unfulfilled housing need in the Borough. However, Green Belt rules make it clear that unfulfilled housing need is not normally considered to be ‘an exceptional circumstance’. If it were the entire Green Belt would already be covered in tarmac.

The NPPF is clear that every movement in settlement boundaries must be justified by ‘exceptional circumstances’. GBC have offered only a generic justification in their Topic Paper of meeting unfulfilled housing need, but a case by case justification has not been provided. As such, we believe

the settlement boundary changes referred to above (and many others) are invalid without such detailed justification.

c) Paragraph 4.3.17: Proposal to remove Wisley Airfield from the Green Belt

I object to the proposal to remove Wisley Airfield from the Green Belt. The only justification for this proposed change is unfulfilled housing need which is not considered an exceptional circumstance. The proposed Wisley development is discussed further below in the Site Allocation section.

d) POLICY P2: Limited In-filling

A new planning designation has been introduced called ‘the identified boundary of the village’. For East Horsley this covers a number of roads south of the A246. It is a sizeable area, covering 45 hectares, the equivalent of 23% of the present Settlement Area of the village. Within this area, Policy P2 sets out proposals that would allow ‘limited in-filling’ within this boundary.

We find it hard to reconcile the opening statement of Policy P2 that “We will continue to protect the Metropolitan Green Belt” with this sizeable reduction in effective Green Belt status. In our opinion, this policy represents a de facto extension of the Settlement Boundary and a substantial reduction in the operational effectiveness of the Green Belt, whose effectiveness is significantly weakened where this new planning designation applies.

I object to the proposal to designate roads south of the A246 as being within the ‘identified boundary of the village’ and to allow limited infilling within this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6032  Respondent: 9051617 / Carol Mills  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. We need to protect the green belt. Green spaces are precious and we must look after them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/954  Respondent: 9052129 / Sue Wright  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. We need to protect the green belt. Green spaces are precious and we must look after them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy P2: Green Belt and the Countryside / Policy P1: Surrey Hills Area of Outstanding Natural Beauty (AONB)

The first line of Policy P2 states, “We will continue to protect the Metropolitan Green Belt against inappropriate development.”

I am totally opposed to the village's removal from the Green Belt by insetting and extending the 2003 Local Plan Settlement Area boundaries and cannot see any exceptional circumstances for insetting the two parts of the village from the Metropolitan Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10226  Respondent: 9059137 / E.U. Hunt  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I would like to lodge my objection to the proposed plan to remove Chilworth and Shalford from green belt status..... this can be verified with her personally, she doesn't have email but wants her objection heard, pls acknowledge this has been accepted, Many Thanks

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13801  Respondent: 9061921 / Susan Hills  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to plans to remove Horsley from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5415  Respondent: 9062433 / Lisa Griffiss  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I would like to lodge my objection to the Guildford borough Council proposal to remove Green Belt protection from a number of villages in the Guildford area. It is proposed to include Chilworth in this plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
This village has reached saturation point with the huge amount of new housing that has gone up over the last few years and building on the remaining green fields would turn the village into a Guildford suburb and ruin its character.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

POLICY P2 – Green Belt

OBJECT We object to the insetting of 14 villages from the Green Belt, and the proposal that infilling is acceptable within a further 12 villages within the Green Belt. We are concerned that “infilling” is also proposed outside the settlement boundaries of 11 further villages. Essentially, all the villages within the Green Belt are now vulnerable to extensive further development.

Green Belt is supposed to be protected as a matter of national and local policy, but this policy seeks to justify development in a supposedly protected area, in breach of local manifesto commitments and contrary to previous responses to public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the changes to Policy P2 because they have not addressed many of the 32,000 objections made to the 2016 plan.

I object to the new para (1) “The Metropolitan Green Belt will continue to be protected as shown designated on the Policies Map, against inappropriate development. In accordance with national planning policy, the construction of new development will be considered inappropriate and will not be permitted unless very special circumstances can be demonstrated.” The words “as shown designated on the Policies Map” should be deleted. The Policies Map has effectively ignored huge areas of Green Belt protection and the new para (1) is therefore a sham.

I object to the proposed change that Send Business Park should be inset from the Green Belt due to the fact that:

- It is effectively a non-conforming user in an area of beautiful countryside adjacent to the beautiful Wey Navigation.
- It should not be given the opportunity for further expansion or development

Policy P2 still completely fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it has been around for a long time and it needs to be permanently protected. It was actually established in a local act of parliament in Guildford under the London Home Counties (Green Belt) Act 1938 and subsequently in the 1944 Greater London Plan to contain the outward sprawl of London. The boundaries of the Green Belt through Guildford Borough...
were later defined in the 1987 Local Plan, forming part of a 19-24km concentric belt around London. The Green Belt is intended to check the unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and other urban land. The principles of the Green Belt designation were outlined within Planning Policy Guidance 2: Green Belts (PPG2) and are found within the National Planning Policy Framework (NPPF). The Metropolitan Green Belt is an exemplar of good planning and the envy of planners throughout the world.

Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital.

It is quite incorrect to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold. No-one argues that we should sell 1.6% of the Crown jewels in order to build houses.

I object to the statement in the Draft Local Plan under Green Belt Policy P2 (4.3.13) which claims that 14 villages are “now inset from the Green Belt”.

This statement is untrue as GBC is proposing to “inset” these village. No decision has been made by an Inspector, therefore the villages remain in the Green Belt.

I object to the changed “insetting” of 15 villages from the Green Belt, and at “infilling” 12 of the borough’s Green Belt villages.

I are deeply disturbed that settlement boundaries are to be hugely extended in many villages (including Send) and that infilling is also proposed outside the settlement boundaries of 11 further villages. This is completely unplanned and unmeasured development outside of the OAN.

Many Guildford villages are “leggy” in outline, reflecting the effect of ribbon development (often along just one side of existing roads) permitted between the Wars. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost hell bent on self-defeat.

Many of the local village should not be removed from the Green Belt. Send, for example, provides an important Green Belt buffer between Woking and Guildford. The village and the countryside behind the A247 should all be protected.

1.1 I object to three particularly vulnerable areas of high quality amenity land being taken out of the Green Belt at Send which include:

The land behind the schools including playing fields and woodland.

The land to the right of Cartbridge by the River Wey Navigation up to the new boundary fence with Vision Engineering.

Land to the left of Cartbridge going up to the old depot on the Wey Navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10535   Respondent: 9063393 / A.M. Brain   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I am strongly against the plan to lift Green Belt protection from the village of Chilworth and parish of St Martha.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2554  Respondent: 9064481 / M Bystram  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing to object to the removal of Chilworth village from the green belt protection this is totally unacceptable and must not be allowed to happen, please could you register my objection.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9618  Respondent: 9069121 / E Short  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing in response to the Proposed Submission Local Plan: strategy and sites 2016. I am incredibly worry by the impact that losing the protection of being within the Green Belt would have on the wilds spaces that have hitherto been protected. The natural environment around Chilworth and Shalford is what makes this area such a valued place for people of Surrey and beyond.

I am also aware that the Guildford Environmental Forum have pointed out that:

The Framework is clear that local planning authorities should, through their Local Plans, meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole, or specific policies in the Framework indicate development should be restricted. Such policies include those relating to sites protected under the Birds and Habitats Directives, and/or designated as Sites of Special Scientific Interest; land designated as Green Belt ...

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8648  Respondent: 9070241 / Adrian Butler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing to advise of my objections to the new Guildford Borough local Development plan recently published.

Loss of Green Belt Land: I strongly object to the expansion of the Horsley village boundaries and its subsequent removal including Ripley, Send and Clandan from the Green Belt. The new mayor of London has instructed London planners
NOT to approve development on Green Belt Land within the M25. If we continue to build on our countryside it won't be too long before we have none left. There is insufficient details and/or evidence within the local plan to support why this action is necessary and therefore I strongly object. Our British countryside needs to be preserved along with our wonderful animal, bird and plant lifewhich will be inevitably affected by the erosion of the Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13870  Respondent: 9070561 / Peter Worth  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

As you know, this is not the first time I have lodged an objection against your plans and am once again dismayed to find ourselves in a position to do the same again so soon after the previous occasion.

My primary reasons for objecting are unchanged:

1. The suggestion to remove East and West Horsley from the Green Belt is an absolute disgrace and the Borough Council should be ashamed of such a suggestion - GBC as custodians of this wonderful borough should be endeavouring the preserve every inch of green belt it has.

2. I fail to believe there are not many, many better solutions available in and around the towns of this borough that could be used as development sites for a large number of these proposed houses. I am sure building on brownfield or previously developed sites costs more than greenfield site, but is cost alone a good reason to destroy the Green Belt? No.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17873  Respondent: 9078881 / Jean Trickett  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am opposed to the ANY OF THE 14 VILLAGES named on the Plan being "INSET" as this will inevitably lead to more development and further loss of the Green Belt. Village boundaries should NOT be increased to allow developers to propose even more sites than have already been identified by GBC.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
LOSS OF THE GREEN BELT

GBC say they want to protect the Green Belt - how do not see how proposals to build 14,000 new homes will achieve this, quite the opposite in fact

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/18556</th>
<th>Respondent: 9079393 / Wisley Property Investments Ltd.</th>
<th>Agent: Savills (Charles Collins)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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</table>
| Do you consider this section of the document; complies with the Duty to Cooperate? ( )
|                            | is Sound? ( )
|                            | is Legally Compliant? ( ) |

Policy P2: Green Belt

Support (Sound)

The overall amendments to the Green Belt boundaries, as shown by the Key Diagram, Proposals Map and proposed allocations, including Wisley Airfield are supported.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 160715_Local_Plan_Reps_July_2016_and_Appendices.pdf (11.0 MB)

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/9823</th>
<th>Respondent: 9080737 / Andrea Wright</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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</table>
| Do you consider this section of the document; complies with the Duty to Cooperate? ( )
|                            | is Sound? ( )
|                            | is Legally Compliant? ( ) |

I am totally opposed to the development of our precious Greenbelt. It should not be viewed as a readily available source of land for development. We should certainly not be using up all the options in this local plan so as to exclude any future generations the ability to preserve it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/5424</th>
<th>Respondent: 9081089 / William D Barker OBE</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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| Do you consider this section of the document; complies with the Duty to Cooperate? ( )
|                            | is Sound? ( )
|                            | is Legally Compliant? ( ) |

I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Comment ID: PSLPP16/9553</th>
<th>Respondent: 9094497 / Janet Stiles</th>
<th>Agent:</th>
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I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/6992</th>
<th>Respondent: 9094753 / D Jones</th>
<th>Agent:</th>
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I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.
I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so-called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPP16/3772  **Respondent:** 9097409 / Lindsey Fisher  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Reference the Guildford Local Plan 2016 - The Horsleys, please see my comments below:

**Green Belt**

It appears that the proposals aim to remove West and East Horsley from the Green Belt which I strongly object to and I am still unclear what the “exceptional circumstances” required to make this change are? Once the Green Belt is gone, it’s gone for ever and the balance of the wildlife and vegetation will disappear. If you start to change any Green Belt it is open to abuse ongoing – it was created for a purpose and to protect the area for plans such as this! We are near the Surrey Hills AONB which encourages many visitors and events.

**Boundaries**

What are the ‘sound’ reasons for extending the boundaries of the Settlement areas of the Horsleys?

It seems unclear.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp171/806  **Respondent:** 9097409 / Lindsey Fisher  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Green Belt**

- I strongly object to no changes being proposed since the 2016 consultation regarding Insetting West and East Horsley from the Green Belt!

- Unacceptable that Guildford intends using Green Belt for housing. It appears that by 2034 Guildford will have grown by nearly 25%! Once the Green Belt is gone, it’s gone for ever and the balance of the wildlife and vegetation will disappear. If you start to change any Green Belt it is open to abuse ongoing – it was created for a purpose and to protect the area for plans such as this!

- Concerned that justification for the planned expansion may be inaccurate.

**Development Sites**

- I object to the fact that only 2 of the six original housing development sites in the Horsleys have been removed. There are too many new dwellings proposed on Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/17261  **Respondent:** 9228769 / Cathryn Fleming  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Inclusion of the Wisley Airfield and the 2000 plus homes etc

- This is a HUGE encroachment of the Metropolitan Green Belt
- The proposal is an inappropriate development in the Green Belt as defined by the NPPF paras 88 and 89
- The site is clearly visible from the Surrey Hill AONB and it will therefore have a negative impact on views to and from AONB
- Development of this site will result in harm to the rural landscape, the character of the area and the openness of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17263  Respondent: 9228769 / Cathryn Fleming  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Proposal to Remove Horsleys from the Green Belt

The exceptional circumstances that are required to remove a village from the Green Belt HAVE NOT BEEN DEMONSTRATED.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12373  Respondent: 9237953 / Patricia Wood  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to ANY of our villages being taken out of the Green Belt. Former Conservative Governments created the Green Belt, to provide a “Lung for London” and to prevent the urban sprawl that this Local Plan is proposing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17/515  Respondent: 9241793 / Nicky Wilson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object removing Send Business Park from the Green Belt (4.3.15).
Send Business park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for it’s insetting (removal) from the Green Belt, and indeed GBC have not even attempted one. Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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GREEN BELT

The Green Belt is a precious and important commodity that is not to be exploited. Its fundamental aim is “to prevent urban sprawl by keeping land permanently open.” Additionally, it preserves and improves air quality and helps prevent flooding. We should protect and conserve it. There are five legally defined objectives for the Green Belt that are accepted by the national government and our local MP (Sir Paul Beresford). Even the Guildford Conservative election manifesto pledged to protect the Green Belt.

- To check the unrestricted sprawl of large built up areas
- To prevent neighbouring towns merging into one another
- To assist in safeguarding the countryside from encroachment
- To preserve the setting and special character of historic towns
- To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

I object to the removal of East and West Horsley (and 13 other villages) from the Green Belt, under the definition of ‘insetting.’ It is little consolation to suggest that GBC will off-set the removal of these villages by adding to the Green Belt in and around Ash and Tongham, conveniently, around the GBC leader’s ward. This is nothing more than a blatant vote rigging scam.

Section 9/87 of the NPPF states: As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

Unmet housing need is NOT an exceptional circumstance in law. GBC has not demonstrated any exceptional circumstances. Green Belt boundaries should NOT be changed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of “About Guildford” (published by the Council) on page 5 states that “... the Plan rejects any schemes that would have a detrimental impact on the Green Belt.” This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.
Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

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There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/4492</th>
<th>Respondent: 9298465 / Peter Grover</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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</table>

1. SITES - POLICIES A1 TO A57

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/2664</th>
<th>Respondent: 9298657 / Fridrun Williams</th>
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I am writing to show my objection and dismay at the proposed abolition of Green Belt Land around the villages of Chilworth, Shalford, Peasmarsh and surrounding villages. Green Belt land
should be reserved for exactly what it says GREEN BELT, the villages are in an area of Outstanding Natural Beauty within the Surrey Hills.

Pollution through extra traffic through the villages and the destruction of wildlife habitat will have a completely detrimental affect on the 'country side'

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/8084  **Respondent:** 9298689 / Rod Wild  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

Policy P2 - Green Belt

OBJE CT. Insetting villages in the Green Belt is contrary to the whole spirit and intention of the Green Belt. Insetting Fairlands i s an example and could allow inappropriate planning applications having to be allowed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/6725  **Respondent:** 9299745 / Simon Runton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

I believe this is a flawed policy and I object strongly to the plan. I suggest all Green Belt sites should be removed from it until “exceptional circumstances” for development are proven, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as I understand case law has established.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/11145  **Respondent:** 9320289 / David Francis  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

I object to all in setting i.e removal of villages from the green belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
I wish to protest in the strongest possible terms to the proposed development plans around East and West Horsley. They also represent a major destruction of the Green Belt.

To add to this problem is totally irresponsible apart from the destruction of large swathes of the green belt.

Why can no-one think about the reintroduction of the regional development scheme that used to finance business and people to set up in parts of the country where the infrastructure can cope?

We need to look at how the increased needs can be reduced in the South East before it sinks under concrete.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I write as required ahead of 18 July 2016 to object to the Draft Local Plan currently available for comment. Please confirm receipt of this letter and take regard of my submissions as follows:

<-
  • I object to removal of Send Village from the Green Belt
   • I object to removal of Ripley and Send Marsh from the Green Belt
   • I object to removal of Ripley from the Green Belt

The previous draft local plan was withdrawn after generating widespread local opposition. Our Mole Valley MP Sir Paul Beresford responded to that; a copy of his comment dated 21 September 2014 is enclosed. His document retains its validity. Sir Paul observed:

"This catalogue of errors and omissions has led to a situation in which the Local Plan as presented has no detectable support from Guildford residents and has managed only to anger and worry so many of those who stand to lose the unique and valuable rural village lifestyle they currently enjoy in the Mole Valley Wards of Guildford Borough".

Sir Paul's commentary applies to the revised plan as do other submissions in response to the last draft plan (including my own earlier letter which I attach as well). I object to the revised plan generally for all of the reasons cited in my September 2014 letter in respect of certain sites then earmarked.

I object to this new or second Draft Local Plan (as Sir Paul anticipated it) because Guildford Borough Council still has not recognised local feeling and opinion in formulating it. I object to the failure to consult in any responsible way and to the approach taken for all of the reasons recited by Sir Paul which seem to have been ignored in compiling the new or second Draft Local Plan.

Our infrastructure in Send, Ripley and Send Marsh and Clandon being already overloaded such that the smallest disruptions cause gridlock over much of our essentially rural roads network please also note that:

  • I object to an expanded A3 interchange at Burnt Common,
  • I object to housing and business development proposed for land described as Garlick's Arch,
• I object to housing development at Clockbarn Nursery,
• I object to housing development at Send Hill, all of these sites being unsuitable and in the Green Belt

I object to the proposed Local Plan in so far as Send is concerned because there is:

1. no clear assessment or evidence in support of the assumptions the plan is based on
2. no exceptional circumstance justifying taking land around Send out of the Green Belt
3. no evidence of a requirement for the proposed scale of development
4. excessive proposed housing and industrial development
5. no evidence of need for extra industrial or warehousing land in Send
6. no reliable projected housing need thus rendering the Plan invalid
7. substandard and only partial connections onto the main A3 and M25 roads

1. a very poor and overloaded local road network connecting with towns such as Woking and Guildford
2. existing chronic traffic congestion
3. inadequate other infrastructure such as schools and medical facilities

Furthermore, the proposed plan for Send does not take account of what local residents want. Most people support the presumption against building in the Green Belt as now established. The National Planning Policy Framework is ignored.

We risk losing beautiful countryside and lovely places to walk, conservation area riverbank along the River Wey, our wildlife, woodland and open fields, likely becoming a congested suburb.

The Local Plan as proposed is not a template for sustainable development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  
LP2016 Local Plan Objections Attachment Paul Holden.pdf (5.6 MB)

Comment ID: pslp171/1421  Respondent: 9323361 / Paul Holden  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I write as required ahead of a 24 July deadline to object to the New Draft Local Plan 2017 because:

• I object to removal of Send Village from the Green Belt,
• I object to removal of Ripley and Send Marsh from the Green Belt.

Although previous draft local plans were withdrawn after widespread local opposition there has been no recognition of local feeling and opinion in formulating this third version.

A blizzard of paperwork renders the plan opaque to a yet greater extent. Impenetrable lists of changes of no substance to complainants' responses require a massive effort to engage with at even a superficial level.

GBC assert that objections will only be accepted if related to the New Plan changes; I say that is wrong.

Nevertheless I hereby object to the New Plan changes to ensure my complaints are recorded:

• Clockbarn, Tannery Lane Policy A42 - an increase to 60 additional dwellings will worsen traffic problems and damage our green belt,
Garlick's Arch, Send Marsh Policy A43 - 400 dwellings and 6 traveller plots are not appropriate in the green belt,
Burnt Common, Policy A 58 - industrial/warehouse development in the green belt isn't needed or appropriate,
Green Belt Policy 2 (para 4.3.15) - inset of Send Business Park is an inappropriate green belt intrusion.

Each of these changes would increase traffic, spoil the countryside and defeat the green belt protection carefully
husbanded for 75 years.

I fully support the Save Send Acton Group's propositions in their attached commentary leaflets.

Sir Paul Beresford our Mole Valley MP has said of the plan process:

"This catalogue of errors and omissions has fed to a situation in which the Local Plan as presented has no detectable
support from Guildford residents and has managed only to anger and worry so many of those who stand to lose the unique and
valuable rural village lifestyle they currently enjoy in the Mole Valley Wards of Guildford Borough".

Sir Paul's commentary applies to the revised plan; his observations seem to be ignored.

Infrastructure in Send, Ripley, Send Marsh and Clandon being already massively overloaded, small disruptions cause
gridlock over much of our essentially rural roads network so please also note that I still object to:

- an expanded A3 interchange at Burnt Common,
- housing and business development proposed for Garlick's Arch,
- housing development at Clockbarn Nursery,
- housing development at Send Hill.

[Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of
the Data Protection Act 1998]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Untitled.pdf (2.5 MB)
GBC Councillors were elected at the last election on the basis of keeping the Greenbelt free from development -

"Party promises to protect the Green Belt and focus new development on Brown Field sites following public consultation and residents’ views. Anne Milton and Guildford Conservatives — Good Government for Guildford Conservatives in Guildford have listened to residents’ concerns about Green Belt development. Every Council must go through a Local Plan process, setting out how it will meet the need for housing during the next decade. Initially the Government demands that all options be considered. But following a thorough public consultation, it is clear that Guildford wants to keep its green spaces and Green Belt. That is why the Conservative Party is pledging to focus on providing new homes on Brown Field sites. Development on Merrow Downs and Pewley Hill have been ruled out. Plans at Blackwell Farm and Fairlands are strongly opposed by local Conservative candidates."

........ and yet this is not the case.

Brownfield sites seem to have been ignored in the Proposed Submission with further destruction of the Greenbelt and I object to this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10749  Respondent: 9334785 / Carol Cook  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I avidly object to not protecting the Green Belt (Policy P2) The Green Belt is there to protect our green open spaces for future generations to enjoy as we have done over the years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10636  Respondent: 9335041 / David Reeve  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy P2: Green Belt

I OBJECT that as GBC has made no attempt to verify the accuracy of the OAN published in the West Surrey SHMA Final Report (September 2015), and that two independent reports have identified errors in the derivation of the OAN (see the comments on Policy S2 above), the statement in paragraph 4.3.16 of the draft Local Plan that “We consider that exceptional circumstances exist to justify the amendment of Green Belt boundaries in order to facilitate the development that is needed and promote sustainable patterns of development” is completely untenable.

I OBJECT that the proposal to inset villages from the Green Belt is based on the Green Belt and Countryside Study, which has been widely criticised and discredited for (amongst others) the following reasons:
• Being internally inconsistent.
• Being highly subjective.
• Being rehashed at least twice with the apparent aim of supporting a pre-judged conclusion. This pre-judgement largely aligns with the results of the Settlement Hierarchy was itself comprehensively discredited in 2013-14.
• It’s adherence to a methodology that supposes that sensitive decisions on complex matters can be taken by a very simplistic scoring system based on a trivial tick box approach.

I OBJECT to the specific conclusions to inset both East and West Horsley. In particular, the entire length of The Street in West Horsley is a fairly typical rural Surrey Hills village with a considerable proportion of Listed Buildings, and it makes an important contribution to the openness of the Green Belt; there is therefore absolutely no reason for it to be inset in a misguided attempt follow the provisions of NPPF paragraph 86. I strongly suspect that the same can be said of several of the other dozen or so villages that the Plan proposes to inset, and these also need to be reviewed.

Notwithstanding my objection to insetting the villages, I object to the way in which the proposed insetting boundaries have been drawn. NPPF paragraph 85 requires new Green Belt boundaries to be clearly defined using “physical features that are readily recognisable and likely to be permanent”. In this regard, the following cases do not comply with the provisions of NPPF:

• In West Horsley, the Green Belt and Countryside Study (GBCS) defines boundaries 3B, 3C, 3D, 3E, 3F and 3M which are all simply plot boundaries at the end of residential gardens. Elsewhere in Section 26.3 of Volume 6 of the GBCS, it states that “More temporary features, such as fencing, are not considered to provide the degree of permanence necessary to represent a Green Belt boundary in accordance with the NPPF”.
• Also in West Horsley, the boundary drawn around Allocated Site A41 is an example of the substitution of a good defensible boundary along East Lane by a very subjective and rather contorted boundary around three fields, where the proposed boundary is marked by hedgerows and plot boundaries – which are clearly not so defensible as the more obvious boundary along East Lane.
• In East Horsley existing boundaries along watercourses on the eastern side of fields of Allocated Site A39 and the recreation area in Kingston Meadows have been moved to less identifiable and less defensible boundaries along the western side of the corresponding areas. These boundaries are less defensible than the line of the watercourses that they have replaced.

I am confident that the examples above are precisely that – examples which no doubt repeat themselves time after time across the borough. The entire basis of the proposal to inset the villages needs to be reviewed, because it pays little more than lip service to the requirements of NPPF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pssl171/2632  Respondent: 9335041 / David Reeve  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the arbitrary and inconsistent approach used in the Green Belt & Countryside Study, and also to the pre-ordained results of the Settlement Hierarchy.  I note that no revision has been made to the Settlement Hierarchy despite my earlier correspondence which presents conclusive evidence that the hierarchy was “adjusted” on a highly subjective and pre-judged basis (see attached letter dated 19th June 2014).  The large volume of carefully considered objections to the Green Belt & Countryside Study in previous consultations and in separate correspondence has also apparently been ignored by the Council.  As the underlying rationale for insetting is flawed, and is therefore unreliable, this Policy itself is unreliable and its provisions to inset villages should be struck out.

I therefore object to this Policy on the grounds of a wholly inadequate evidence base for the selection of villages for insetting, and on the arbitrary and inappropriate choice of insetting boundaries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
**Comment ID:** PSLPP16/5873  **Respondent:** 9412065 / Stephen Bray  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

P2 - Green Belt, limited infilling:

Again I support this policy in the interests of West Horsley, there are to my certain knowledge a selection of suitable sites available in and around the present village settlement boundaries which are not presently allocated for potential housing, but which would meet this criteria.

These additional sites would also be available to provide affordable homes, and/or on a rural exception basis, and to potentially provide community facilities as I have put forward later in this consultation response.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/6256  **Respondent:** 9607905 / Anne Pascoe  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

3. I OBJECT to not protecting the Green Belt

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick's Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a 'special circumstance' and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC's Green Belt & Countryside Report does not address Garlick's Arch, so there is no evidence base to support including this site.

Rather than developing Garlick's Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/6431  **Respondent:** 9607905 / Anne Pascoe  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Garlick's Arch has previously been protected from development as GreenBell. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (Blc), general industrial (B2) and storage and distribution (BB). There are no exceptional circumstances which allow for the removal of this land from the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/6433  **Respondent:** 9607905 / Anne Pascoe  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brownfield site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick's Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council's own GreenBelt & Countryside Report does not address Garlick's Arch at all, so there is no evidence base to support the inclusion of this site.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/17365  **Respondent:** 10270913 / ECA (Martha Covell)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We object to Policy P2 which provides for new defined village boundaries, inset from the Green Belt, and major previously developed sites adjacent to a number of villages within the Green Belt. Whilst many of the District's villages provide a sustainable location for future development, the new boundaries are based on an inadequate and unsound evidence base, namely the Green Belt and Countryside Study (GBCS).

The GBCS is unsound because:

- (1) It has failed to adequately assess sites and parcels in terms of the five purposes of the green belt and including land within it, as set out in the NPPF. Only sites which do not serve these purposes should be allocated for development;
- (2) The size of the parcels assessed are too large to enable proper detailed assessments of sites to be undertaken, taking into account important factors such as the need to define boundaries clearly, using physical features that are readily recognizable and likely to be permanent, in accordance with Paragraph 85 of the NPPF.

Policy P2 makes clear that many of the Borough's villages will be inset from Green Belt if it is the view that they do not make a contribution to the openness of the Green Belt. Para. 4.3.13 states that Effingham will be inset from the Green Belt. The updated proposals map for Effingham (Page 338 of Appendix H) shows how the village boundary will be inset from the Green Belt and the relationship of this boundary to the Effingham Village conservation area.
We object to the amended Green Belt Boundary to Effingham Village on the grounds that it will lead to the merging of Effingham and Bookham and fails to give full consideration to the requirements of the NPPF in terms of the need to make full use of natural and man made features to create defensible green belt boundaries. The green belt boundary should be amended and the TREG site on Effingham Common Road to the north of the village should be taken out of the Green Belt. The Ancient Woodlands to the North and West should form defensible boundaries to the Green Belt instead of rear gardens to dwellings.

Below is a more detailed analysis of why the proposed village boundary to Effingham is unsound contrary to paragraph 80 and 85 of the NPPF. Attached is our Green Belt Assessment of Effingham Village which examines the character of the Green Belt here in far more detail and should be taken into account in the consideration of amending the Green Belt boundaries here:

Land north east of Effingham Village

The area to the north-east of Effingham Village currently serves a number of green belt purposes in terms of preventing urban sprawl and keeping land permanently open in accordance with Section 9 of the NPPF. It is unsound to allocate land currently within the Green Belt that serves all of these purposes. However

Land to the North East of Effingham Village currently serves a number of these purposes, more so than other parcels of land adjoining the village, which should be allocated instead. Details are set out below:

- Purpose 1: ‘To check the unrestricted sprawl of large built-up areas: The parcel of land north-east of Effingham currently restricts the built up area of Effingham and Great Bookham and plays a vital role.
- Purpose 2: ‘To prevent neighbouring towns merging into one another: This is the prime purpose of this piece of green belt as it prevents the villages of Bookham and Effingham from merging into each other. If this site was built upon then there would be a continuous development form one village to the other and the gateways between the two villages would completely disappear’.
- Purpose 3: To assist in safeguarding the countryside from encroachment. The allocation of this site for development would lead to significant development encroaching into the Countryside. Unlike our client’s site opposite on Effingham Common Road, there are no natural or man made barriers to the north to prevent the Countryside form further encroachment in the future. This allocation is therefore contrary to advice contained within Paragraph 85 of the NPPF which states that local authorities, should define boundaries which are clear and use physical features.
- Purpose 4: To preserve the setting and special character of historic towns; Effingham is an historic village and conservation area. However this site is not immediately adjacent to the historic core and development is unlikely to have a significant affect on the character of the village. Not withstanding this, the sites have an open character and forms a gateway into the village which is currently green fields leading into an historic core will be severely eroded as a result of this allocation.
- Purpose 5: ‘To assist in urban regeneration, by encouraging the recycling of derelict and other urban land’ A very small part of the site contains some disused glass houses. However these are temporary structures and the land has an open and undeveloped character, with the exception of the school site. The site is therefore not in need of regeneration.

We trust you find these representations of use and we look forward to continuing our discussions with you in relation the potential site on Effingham Common Road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.
In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15101  Respondent: 10326081 / Ian Wilkinson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

"We will continue to protect the Metropolitan Green Belt, as shown on the proposals map, against inappropriate development. In accordance with national planning policy, the construction of new development will be considered inappropriate and will not be permitted unless very special circumstances can be demonstrated."

"4.3.16 National planning policy requires that Green Belt boundaries are only amended in exceptional circumstances and that this must be undertaken as part of the Local Plan process. We consider that exceptional circumstances exist to justify the amendment of Green Belt boundaries in order to facilitate the development that is needed and promote sustainable patterns of development."

"In order to facilitate the development that is needed” - hardly an adequate justification for ripping up hundreds of acres of green belt, this is vague, very brief and does not constitute a valid explanation or a reason.

This draft plan proposes a set of developments across the borough which, if implemented, would devastate the Metropolitan Green Belt.

The Council’s housing proposals in the green belt would constitute inappropriate development.

NPPF states:

87. “As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Development in the green belt therefore requires there to be ‘exceptional circumstances in each case to justify the harm done to the openness of the green belt.’”

No such circumstances have been demonstrated in this draft local plan.

The then Undersecretary of State for Planning, Nick Boles has written letters in March and June this year warning that it is unlikely that ‘unmet housing need’ will constitute the ‘exceptional circumstances’ required to allow development in the green belt.

The green belt does not exist purely to be exploited by developers as building land.
This policy states, "the general extent of the Green Belt has been retained." Hardly true.

1.6% of the Borough’s Green Belt is stated would be lost: taking into account the infilling and settlement boundary extensions, 7% is a more accurate figure - far too high.

NPPF: Section 9 - The opening paragraph (79) states:

"79. The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence."

The word permanently and permanence are used and from this, one might assume that the green belt and its boundaries will be permanently maintained.

The Metropolitan green belt was established to be a permanent barrier to future urban sprawl. To allow a series of incremental advances of land available for housing development every ten years is going to rapidly and permanently change and degrade the character of this borough.

The open character of the green belt, that very crucial parameter which the NPPF seeks to preserve in section 9, will, incrementally, be destroyed.

This Council should view the green belt as a major asset, to be preserved at all costs, for the enjoyment of future generations, and not condemn them to a life of suburban misery for the sake of short term economic gain.

This natural asset is valuable beyond compare and the short term political needs of a Borough Council should not be allowed to impinge on the long term aims and purposes of the established Metropolitan green Belt.

Appropriate development in the Green Belt can be achieved through a balanced, even distribution of a realistic and sensible level of new house building throughout the Borough, across the villages and proportional to the existing populations with appropriate infilling; in this way, infrastructures are less stressed and there would be less disruption to the character of an individual settlement.

This approach would also be more democratic; the burden is shared evenly and most people will accept that approach.

Insetting of villages:

OBJECT.

The Green Belt and Countryside Study attempts to identify in a very crude way those villages which will be suitable for insetting.

The so called proposed insetting or removal of a village from the green belt would be a serious retrograde step. The term appears to have been introduced in the 2012 NPPF document which is now effectively the planner's bible.

Pegasus, in their Green Belt & Countryside Study Vol IV, have determined that Ripley village should be inset.

Pegasus appear to have adopted a method of interpretation of NPPF paragraph 86 which considers a village's open character and its susceptibility for insetting. Here they seek 'to measure' the importance of the contribution which the village's open character makes to the openness of the green belt. This is an attempt to convert the requirements of a loosely worded paragraph, written by a legally trained person into a precision scientific measurement; this in itself is a challenge because the very nature of a village's open character does not readily lend itself to this form of measurement. The very form of words in NPPF paragraph 86 was probably chosen because it would be nearly impossible to measure...
the parameter 'importance of a contribution made by a village's open character', and thus the paragraph could be exploited in either direction by parties with different agendas, i.e. developers and those against it.

In the 'Stage 3', we have the 'professional judgements' and the responses on the village insetting criteria, (which are again arbitrary), for Ripley:

"Does the majority of the village exhibit an open character?" - Response: "On balance, the majority of the village is considered to exhibit an enclosed character"!

"Do open areas within the village appear continuous with surrounding open land beyond the village?" - response starts by saying "visual connections to the wider green belt are partially enclosed by woodland"! In reality, virtually all the open areas are continuous with open land or wooded land.

1. a) The questions are farcical.
2. b) The answers to the arbitrary questions are incorrect!

Furthermore, the 'openness of a village' is, of course three-dimensional and the idea that two-dimensional mapping aerial photography and computer analysis in that domain can somehow replace the three-dimensional world is flawed.

Pegasus have effectively 'engineered' this measured solution to their brief, which I would guess was: - 'produce a report which will support the insetting of most of the rural villages in the borough'.

On the 3 Pegasus maps the entire north side bounded by the High Street and Newark Lane is the village green - completely open land. The area to the east - bounded by the High Street and Rose Lane, although increasingly dense towards Rose Lane still has connection to significant open land to the East, including school playing fields. The remaining quadrant, to the West - land bounded by the Portsmouth Road and Newark Lane is the dense conurbation of the Georgelands estate and Wentworth Close etc, including the Primary School and playing fields; this quadrant of the village of course cannot be regarded as open, but its North and West boundaries are directly connected to farmland.

If the combined Georgelands and associated estate were to be distributed throughout the whole village, there would clearly be impairment to the village's open character, but, the fact that the estate is effectively 'condensed' into the compact quadrant has the effect of relieving the majority of the village from an impact on its open character.

The 'perceived village area' is also a totally arbitrary boundary line that has no real logic, and could be drawn virtually anywhere.

Referring to NPPF paragraph 86 again, Pegasus effectively assert that Ripley does not need the protection to its open character provided by being washed over by the green belt; the open character is not likely to be subject to damage by development - really?

Yes, the more vulnerable parts of the village have the protection offered by Conservation Area planning policy, but, we have just seen that hurdle neatly demolished by the recent White Hart Court development - charmingly now named Marlborough Place. Set in the midst of a Heritage Asset, and numerous listed buildings, this hideous, dense, part three-story estate changes the character of Ripley for ever - yes the open character has been impaired.

The open character of Ripley is the essence of the village. This is true of other similar villages nearby.

On entering the village from the North East, within 50 yards on the right is the village green - a large area of open land fully accessed by all; this long strip of land 'the Green', defines the village. Beyond the Green, is farmland and meadows and flood plain toward The Wey. In fact from the High Street and Portsmouth Road which run through the heart of the village, at pretty much any point, you are within 50 or certainly 100 yards of either open land, farmland, other wooded green land, hedgerows or other 'greenness'.

To argue that the open character of the green belt here in Ripley will not be damaged by development (para 86), is extremely dubious and any visitor to the village would surely recognise this.
Insetting would be a retrograde step for all the borough's villages for the reasons outlined.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2292  Respondent: 10423265 / Jillian Tallick  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

2. I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

The Plan should develop the existing brownfield site at Burnt Common rather than developing Garlick’s Arch (A43).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13177  Respondent: 10430401 / St John the Evangelist (Mark Woodward)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY P2 – Green Belt. I object to the insetting of 14 villages from the Green Belt, and the proposal that infilling is acceptable within a further 12 villages within the Green Belt. I am concerned that “infilling” is also proposed outside the settlement boundaries of 11 further villages. Essentially, all the villages within the Green Belt are now vulnerable to extensive further development. Green Belt is supposed to be protected as a matter of national and local policy, but this policy seeks to justify development in a supposedly protected area, in breach of local manifesto commitments and contrary to previous responses to public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16461  Respondent: 10441057 / Guy Kelly  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

* It is Surrey County Council policy (March 2013) by a Motion agreed at a Full Council meeting of Surrey County Council about the Green Belt:

Surrey County Council, March 2013
RESOLVED (unanimously):
Council notes:

1. Surrey County Council has a proud history as the creator of the Green Belt. The County’s Countryside Estate founded by the Surrey County Council Act of 1931 was the basis of the London County Council’s Green Belt Act of 1938.

2. The Coalition Agreement states:

‘We will maintain the Green Belt, Sites of Special Scientific Interest (SSSIs) and other environmental protections, and create a new designation – similar to SSSIs – to protect green areas of particular importance to local communities.’

Council believes:

Surrey’s Green Belt, Countryside Estate, SSSIs and other green spaces are vital, not only for the county’s environment but also for maintaining a “green lung” around London.

Council resolves:
1. To use its power to protect Surrey’s Green Belt.
2. To support the National Planning Policy Framework (section 9 – paragraphs 79 to 92) and the Government’s policy of protecting the Green Belt.
3. To make Surrey’s MPs and the County’s Districts and Boroughs aware of this resolution.
4. That any Green Belt development in the County is in line with the needs and wishes of Surrey residents

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/935  Respondent: 10443169 / Rosslyn Reeves  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The removal of the Green Belt from Send Business Park leaves it open to further expansion which would cause severe problems along the small country roads leading to it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6551  Respondent: 10447777 / J Jordan  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Send and Ripley being taken out of the Green Belt. Having been assured by Cameron that he would protect the Green Belt, suddenly Send and Ripley are removed. On whose authorisation and for what reason. The narrow boat marina has already been approved and to be built on Green Belt land. When the Green Belt is built on it is gone forever and Send and Ripley will become part of the general sprawl linking to Guildford and Woking.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPP16/1424  **Respondent:** 10447969 / John and Angela Symonds  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

To say that I absolutely have no faith in our Conservative Borough Council is an understatement. Elected again on the belief that they would help preserve our precious Green Belt - they seem to be hell bent on doing the exact opposite. All under the illusion of more affordable houses being built. Nonsense. When was there last a development of one or two bedroom houses or flats for the young and needy. Why? because the developers and councils alike keep more benefits from larger, more expensive buildings.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/11225  **Respondent:** 10541313 / Ann Medhurst  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

firstly I do appreciate the need for more housing, especially at the affordable prices but I do not agree with the premise that there is no available land other than Green Belt Land. I feel that this land is sacrosanct and should not be used at any cost. If once we start infringing it 1.6% this year and another percentage another year, in no time at all it will be gone. I feel this is our inheritance for future generations and we should protect it at all costs. I know it is a timely exercise but there are available small brown fill sites to be found which could be used instead. Of course the plan for 140 houses near to us at Keen’s Park could not be accommodated in small areas, but if each area had half a dozen the impact would not be so great and pressure on the infrastructure would be far less. As to the mentioned 140 houses, it is far too many for our area and this will greatly impact the green corridor to Whitmoor Common which the environmentalists are so keen to preserve, and I agree with them.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/17658  **Respondent:** 10550913 / Nathaniel Lichfield & Partners (Tor Barrett)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( Yes ), is Legally Compliant? ( Yes )

The inset of the site from the Green Belt in paragraph 4.3.13 is also strongly supported by the University. The insetting of the site is considered to provide much needed flexibility to greater assist the University in meeting the needs of its students in the future. This approach by the Council is considered to be a positive response to paragraph 27 of the National Planning Policy Framework (NPPF) which encourages local planning authorities to take a proactive, positive and collaborative approach to development that will widen the choice in education.

**Site Location**

The site location map appended to the site allocation identifies the development as appropriate within the car park to the north west corner of the University Campus. This reflects the positioning of the most recent schemes for future student accommodation. Nevertheless, the scheme for student accommodation on site is still emerging. Accordingly, it is important that the site allocation is sufficiently flexible to allow potential changes to the scheme in future, including a
slightly amended layout, if required. The proposals would be appropriately assessed as part of the planning application process in terms of ecological, visual and heritage impact. Consequently, it is considered that the site allocation map should include the whole campus as subject to the site allocation, in line with that submitted as part of the Call for Sites Form submitted in January 2015.

Building Height

With respect to building height, the draft site allocation includes the following as one of its requirements:

“Significant regard to height of buildings (buildings higher than two storeys are unlikely to be acceptable)”.

This is a significant concern for the University in terms of the viability of the scheme. It is considered that in order for the scheme to be viable a building of more than two storeys is required. Paragraph 173 of the National Planning Policy Framework (NPPF) identifies that careful attention should be paid to viability to ensure that plans are deliverable. Therefore sites should not be subject to such policy burdens that their ability to be developed viably is threatened. Given that the scheme is still emerging, it is considered that the site allocation should be flexible in its wording to ensure that a viable scheme can be established. Accordingly, it is considered that in this case the statement that “buildings higher than two storeys are unlikely to be acceptable” is unreasonably restrictive on future development and should be removed. Alternatively, it could make reference to the height of development being a sensitivity in planning policy terms, which would need to be tested as part of any planning application process.

Furthermore, the pre-application request submitted to the Council in March 2015 presented a scheme of 4 storeys which stepped up in response to the ground levels of the site. The pre-application advice (ref. 15/A/00333) stated that “the Council is unlikely object to the scale or height of the building where this does not give rise to harm such as harm to the AONB or harm to the Conservation Area.” Should it be decided to proceed with a development on the site, any harm associated with the building height will be fully assessed as part of the planning application process. The restriction to a height of two storeys in the site allocation is therefore considered to be excessive and unnecessary.

Conclusion

Para 4.2.18 of the Proposed Submission Local Plan states that to minimise pressure on the existing housing stock it is important that any significant increase in full time student number is matched by the provision of purpose built student accommodation. The University has continued plans for expansion including the increase of undergraduate and postgraduate students requiring on site accommodation and consequently intends to deliver on site student accommodation.

The University therefore welcomes the inset of the site from the Green Belt to better meet the needs of its students in the future. In addition the allocation of the site for student accommodation is strongly supported. However it is considered that the building height requirement and site location map are unduly restrictive on future development schemes, particularly in terms of viability. A scheme for student accommodation at the site is still emerging and accordingly it is considered that the site allocation should be sufficiently flexible to allow an appropriate and viable scheme to come forward. The location and building height would be rigorously assessed as part of any planning application to ensure acceptability in terms of the impact on the Green Belt, Area of Outstanding Natural Beauty and Conservation Area for example. Accordingly, these restrictions in the policy itself are unnecessary.

We trust that the above comments will be taken into account by the Council during the preparation of the Local Plan for submission to the Planning Inspectorate for examination.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 13544 GBC (Local Plan Reps) 18-7-2016.pdf (105 KB)
<table>
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<tr>
<th>Comment ID:</th>
<th>pslp171/2026</th>
<th>Respondent:</th>
<th>10551617 / L Truscott</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>I object to Policy P2 Village will be Inset from the Green Belt. A lot of this forms the Wey Navigation Corridor and habitat for wildlife and needs protecting, also the village could see more development not set out in the local plan.</td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Attached documents:</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>I object to Green Belt Policy 2 paragraph 4.3.15 the proposal to inset Send Business Park from the Green Belt because of the narrow vehicular access at either end of Tannery Lane. The Business Park is situated adjacent to the River Wey and any further development of this area would ruin the openness of the countryside.</td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>I OBJECT TO the proposed alterations to the GREEN BELT. It acts as a buffer to urban scrawl. It provides much needed recreational use for people and important habitat for wildlife. It is a valuable and much cherished asset which must be preserved for present and future generations.</td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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Comment ID: pslp171/305  Respondent: 10561953 / M Conisbee  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Green Belt policy 2 parr; 4.3.15.

Send Business Park- has now been removed from the green belt I understand, this is shameful, this is along side the beautiful river Wey Navigation, this should be homes not unsightly industrial buildings.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3565  Respondent: 10562049 / Ian Cameron  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Please taking into account my objections to Developments in Send (A42, A43, A43a, A44) listed below, and draw all my objections to the attention of the Planning Inspector.

Green Belt

I object to the proposals to inset from the Green Belt the villages of Send, Send Marsh/Burnt Common, and Ripley, because (given the proposed developments in them, and the huge developments planned close by at Wisley and Gosden Hill Farm), the first three NPPF main guidelines on preserving the Green Belt are not being adequately observed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7709  Respondent: 10563457 / John Creasey  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the proposal to build on the Green Belt in Send and elsewhere in the borough as the necessary development really needed could be be done in Guildford's urban brownfield areas and this would be much closer to transport hubs that already exist.

I object to Send being removed from the Green Belt as together with the village this Is a buffer zone between Guildford and Woking.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/894  Respondent: 10565569 / Sheila Mardle  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
I OBJECT TO ALL EROSION OF THE GREEN BELT. Our green belt is precious to the environment and especially I object to the removal of any villages from the green belt. My village of Send cannot sustain the development which would surely follow this action. We are a community with our own identity and do not wish to be swallowed up as an extension of WOKING.

There are several areas in our village which would be extremely vulnerable to development. Our school, doctors surgery and roads just cannot sustain any increase in residents.

I OBJECT TO THE VERY LATE INCLUSION OF LAND AT GARLICKS ARCH. I do not believe this important conservation site should be developed and cannot see the need for the extra 400 houses or the industrial units proposed for the site. It is obvious to those of us who live in Send that the proposed 4 way interchange at Burnt Common would be a disaster for our village and Ripley and Clandon. I live on the A247 and already the road is at gridlock on many occasions. It would appear that our lives are to be severely blighted because of proposed development else where ie Wisley and Burpham. No wonder we think not Send again!

The houses at Winds Ridge and Send Hill are another new site not consulted upon. Again more erosion of our green belt. Not Send again!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy 2: Greenbelt and countryside

I strongly oppose any changes to the boundaries of the green belt and the removal of West and East Horsley from the green belt by insetting and extending the 2003 local plan settlement boundaries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6815  Respondent: 10570049 / Jenny Peachey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the removal of Send from the Green Belt because the village and its countryside provide a necessary buffer between Woking and Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/72  Respondent: 10570049 / Jenny Peachey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Policy 2 at paragraph 4.3.15.

Send Business Park now taken out of the Green Belt altogether.

It is an old non-conforming user in an area of outstanding countryside adjacent to the Wey navigation.

There is highly restricted vehicular access along this narrow winding lane.

This location is totally unsuitable for further expansion/development and it will detract from the openness of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/298  Respondent: 10579137 / Julie Ottey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I wish to object to the local plan. On the grounds that the Green Belt should be protected and should not be built on. Villages should not be taken out of the Green Belt. Seeking to have development in a protected area, is in breach of manifesto commitments.
There will not be provision for affordable housing, with priority for local people. Once our beautiful countryside is destroyed, there can be no turning back.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

2. PROTECTING POLICIES

Policy P2: Green Belt

a) Paragraph 3.13: Proposal to inset East Horsley from the Green Belt

I OBJECT to East Horsley being removed from Green Belt as it has preserved the rural character and openness of this village and surrounding area.

East Horsley is a rural village and its Green Belt status has been a key factor in preserving its character yet being in the Green Belt has not impeded its housing build. The village parish also contributes greatly to the openness of the Green Belt being at least a third woodland with large gardens and low-density housing.

b) Paragraph 4.3.16 and Proposals Map: Settlement Boundary changes in East Horsley

I OBJECT to the proposal to move the settlement boundaries along the eastern boundaries of Ockham Road North and Lollesworth Road when the only justification for this change could be to bring a large field within the settlement area in order to provide more housing land. Under NPPF rules this is not a sufficient justification for changing a Green Belt boundary.

I OBJECT to the proposal to remove Kingston Meadow from the Green Belt. Kingston Meadow is the main public recreational space of East Horsley and West Horsley, comprising various sports facilities and playing fields. If any changes are to be made at all it should be designated as a SANG in order to protect this land from any irresponsible planning or development. Under NPPF rules Green Belt boundaries should only be changed in 'exceptional circumstances'.

c) Paragraph 3.17: Proposal to remove Wisley Airfield from the Green Belt

I OBJECT to the proposal to remove Wisley Airfield from the Green Belt in order to fulfil the estimated housing need, building a small town of this size to meet Housing Need on Green Belt is not an exceptional circumstance. It will have a major adverse impact on infrastructure across a widespread area, including East Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
GREEN BELT, POLICY 2 AT PARAGRAPH 4.3.15
The Policy proposes taking Send Business Park out of the Green Belt.
I OBSERT to this policy to inset the Send Business Park from the Green Belt because;
• It is an old non-conforming user in an area of great natural beauty on the Wey Navigation Canal, which the buildings once served and have historical significance.
• Access is highly restricted in Tannery Lane. (See above comments on Clockbarn Nursery). Further development would be out of place in open countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7103  Respondent: 10615137 / Nav Nair  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am absolutely opposed to insetsing to remove West Horsley and East Horsley from the Green Belt. I’ve seen no evidence of the unpreventable, exceptional circumstances that dictate land previously protected by national legislation and areas of outstanding natural beauty, should not continue to be protected.

What is the justification for extending the boundaries of the village settlement areas, other than subversively allocating more area away from the green belt and towards development?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6756  Respondent: 10616193 / Kate Mumford  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the removal of any villages from the Green Belt and over development of any Green Belt areas in Surrey

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/637  Respondent: 10616225 / Gloria Shoesmith  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

As a resident of my village of Ripley, Surrey all of my almost 70 years I feel I must object most strongly to the proposed plans in and around this village.

1. To give permission to build on Green Belt land will end in a downward spiral of respect for this precious ruling.
I should like to voice my objections to the 2016 draft local plan.

1. I object to building within the green belt.

1. I totally disagree with the plan to remove Ripley and other villages within our local area from the green belt. Is this legal? It is certainly underhand and unfair. What is the point of having a green belt if it can be removed so indiscriminately?

1. I am not convinced about the need for so much new housing or the emotive reasons given by the council, "new homes for essential workers such as nurses, teachers, police officers and firefighters"!

1. I do not believe that it is possible to improve the existing infrastructure (particularly roads) to cope with the influx of so many additional households.

I urge Guildford Borough Council to reconsider all its proposals within its draft plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to any 'in-setting' (ie removal) of any villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9555  Respondent:  10616321 / Petrina Jeffreson  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/231  Respondent: 10616321 / Petrina Jeffreson  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object removing Send Business Park from the Green Belt (4.3.15).

Send Business park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for it’s insetting (removal) from the Green Belt, and indeed GBC have not even attempted one. Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1580  Respondent: 10617441 / Graham Sykes  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM)-

Allocation A35 -for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I am a resident of Ripley and I wish to object to the GBC draft local plan on the following grounds:

This local plan does not protect the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public
consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of “About Guildford” (published by the Council) on page 5 states that “... the Plan rejects any schemes that would have a detrimental impact on the Green Belt.” This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.
There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12683  Respondent: 10619169 / Wendy Critchlow  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as III as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as III as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/304  Respondent: 10620161 / Geraldine Hyde  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We are writing to object against your proposals to take Ripley/Send/Clandon out of the Green Belt.

We have lived in Ripley for over 30 years. With these proposals, life will be hell, more traffic which is bad enough at present. Parking in Ripley is hell at the moment, also no immediate provision for doctor's surgeries. Why do we need all the houses?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/431  Respondent: 10620801 / E. H. and J. A. Strange  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT STRONGLY to all erosion of the Green, “in setting” (ie removal) of any villages from the GREEN BELT. The disproportionate amount of development in one area of the Borough.

I object to the limited consultation period, the last minute inclusion of new sites with less than 2 weeks notice, to the lack of any evidence for the alleged housing need numbers. I object to the lack of immediate provision for new schools, the lack of any immediate provision for Doctors Surgeries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/434  Respondent: 10620801 / E. H. and J. A. Strange  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO ALL EROSION OF THE GREEN BELT.

I OBJECT TO any “in-setting” (ie removal) of any villages from the Green Belt.

I OBJECT TO the disproportionate amount of development in one area of the Borough.

I OBJECT TO the limited consultation period

I OBJECT the last minute inclusion of new sites with less than 2 weeks notice.

I OBJECT TO the lack of any immediate provision for new schools

I OBJECT TO the lack of any evidence for the alleged housing need numbers

I OBJECT TO the lack of any immediate provision for Doctors Surgeries.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9703  Respondent: 10620801 / E. H. and J. A. Strange  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO ALL EROSION OF THE GREEN BELT.
I OBJECT TO any “in-setting”(ie removal ) of any villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10832  Respondent: 10620801 / E. H. and J. A. Strange  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT STRONGLY to all erosion of the Green, “in setting” (ie removal) of any villages from the GREEN BELT.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8172  Respondent: 10623969 / E. J. Hope  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I strongly object to the 2016 draft local plan to remove Ripley, Send and Clandon from the Green Belt.
SAVE THE GREEN BELT.
Also not something must be done about the present traffic situation in Ripley, attention to this matter is long overdue.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8368  Respondent: 10624129 / M Arnold  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I am totally against the local plan you proposed on 6 June 2016.

In my view, the removal of any green belt protection amounts to the desecration of the countryside. Many parts of these areas have rare & or protected animal & plant species.

The additional housing planned for our villages and at Wisley Airfield would mean about 5500 additional vehicles on our very narrow country lanes. The government promised to return the airfield site to green belt after the war and although not formally returned it is as good as.

There are already long traffic queues on the A3 north bound & south bound at the M25 junction during rush hours. Given Wisely/Horsley areas are so close to the M25/A3A junction adding another junction (or feed in to the existing routes) would create chaos on both the M25 and A3.

There are large areas to the West of Guildford that would be much more suitable for development. For example, the area north of the A3 towards Woking also would be better able to accommodate additional housing and traffic as would Farnham, Aldershot, Farnborough & Fleet.

Equally there are many brown field sites around these areas and around Guildford, Leatherhead, Godalming & Dorking which should be used in place of your proposals.

There is no large demand for additional housing in this area. Additionally, there are not enough doctors in the area, there are not enough schools or teachers in the area.

As a retired teacher I can assure you that expanding existing schools is not a solution & would mean education standards would drop dramatically - large schools invariably mean poor standards of education (& indeed behaviour).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17324  Respondent: Graeme Morrison  Agent: PSLPP16/12089  Respondent: John Davis  Agent:

I object strongly to the proposal to remove the Horsleys (and other villages in the Borough) from the **Green Belt**. In paras 79 and 80 of the NPPF (National Planning Policy Framework - Mar 12) the Government places great importance on the Green Belts and in Para 83 states that once established they should only be altered in “exceptional circumstances” through the preparation or review of the Local Plan.

The Green Belt around the Horsleys serve all 5 of the purpose set out in para 80.

Para 84 states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

The draft plan does not identify the “exceptional circumstances” required to remove the Horsleys (and other villages) from the Green Belt nor the “very special circumstances” required to build on Green Belt land.

As outlined above, the green belt is not just a pleasant amenity but also an essential protection against flooding

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to both Sends removal from the Green Belt, the reason a lot of the local residents have chosen to live in and around send is because of its green belt and thus it green fields and open spaces. It also provides us with a buffer from both Woking and Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16101  Respondent: 10638209 / Wendy Rockhill  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the 2016 Draft Local plan.
I object to the disproportionate number of houses being proposed for the country lanes to absorb. Over 70% of these are within the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the removal of the villages of Ockham, Ripley, Send and the Horsleys from the Green Belt without exceptional circumstances being identified.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/2488  Respondent: 10638209 / Wendy Rockhill  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object removing Send Business Park from the Green Belt (4.3.15).

Send Business park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for ‘it’s insetting’ (removal) from the Green Belt, and indeed GBC have not even attempted one. Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/288  Respondent: 10638241 / Irene M Bleach  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO ALL EROSION OF THE GREEN BELT
I OBJECT TO ANY REMOVAL OF ANY VILAGES FROM THE GREENBELT

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3348  Respondent: 10638241 / Irene M Bleach  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5300  Respondent: 10639425 / E.A. Archer  Agent: 

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I object to the enclosure of protected Green Belt land within the proposed new village boundaries, for which there will be a presumption for development in the future.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

"New Version of Guildford local plan-Objection to Shalford Green Belt/settlement boundary" We wish to add our objection to the New Version.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

POLICY P2: GBC says it is protecting the Green Belt, but I didn’t notice it. It seems like 65% of the housing is to go on land now in the Green Belt. This is totally outrageous.

Part of this policy says that East Horsley will be in-set from the Green Belt. I OBJECT to this. The policy has worked well in our village so far, don’t change it.

Part of this policy also puts forward changes to the Green Belt boundaries in East Horsley. I OBJECT to all of these. None of them seem to be justified. And taking two large fields from behind Ockham Road North, which flood all the time, is just plain ridiculous.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The Former Wisley Airfield, Garlicks Cross, the three developments around West Horsley and the Traveller pitches at Valentines farm are all on Green belt land. Greenbelt is precious and must be protected and to build on it is depriving future generations of the open countryside that we have enjoyed and all benefitted from.

The Green belt land must be protected, these continuous encroachments are putting it more and more at risk.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID: PSLPP16/5896  Respondent: 10643457 / Burpham Neighbourhood Forum (Catherine Hughes)  Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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**Green Belt**

Most of the aspirational development on this draft plan are in Green Belt and no justification to change the existing area has been made.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID: PSLPP16/5899  Respondent: 10643457 / Burpham Neighbourhood Forum (Catherine Hughes)  Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I would like to see more brownfield sites used for homes in the town centre and not a focus on retail.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID: PSLPP16/6689  Respondent: 10645281 / Barbara Nicholls  Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I Mrs Barbara Nicholls object to Guildford Borough Council’s proposed to move the Green Belt Boundary to exclude these field, Guildford Borough Council should support the expressed views of the local residents to protect the fields from development. They should retain them within the current Green Belt Boundary and Keep them outside the village settlement boundary

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
I am writing to object strongly to the recent change made to the local Shalford plan which has removed the fields behind the Village Hall and Tennis Club from the Green Belt by putting them in the Shalford settlement boundary. If developed, this would completely change the “rural” character of this area, which is so vital to preserving the Surrey countryside in the face of the enormous pressure to build on every available space possible. The green lung that this provides is not only essential in making sure that the countryside is protected but also contributes to making sure that excessive building does not damage the very heart of this rural countryside.

My great concern is that this represents a direct encroachment of our most valued resource, which once lost cannot be returned. Although these fields have been classified as “open spaces”, this does in effect substantially reduce the protection of the area from housing development, compared to being designated as Greenbelt. What horrifies me is that this has been done without any explanation or confirmation. Any construction on these fields would be 25ft above the village hall and so tower over both the tennis courts and bowling green. This would totally change the green aspect of both these facilities, as well as the village green and pond area – which is currently an amazing common area for locals to relax and wander across on a sunny afternoon. It would also generate considerable traffic on Chinthurst lane, adding to the traffic chaos and pollution that already exist, thereby increasing the potential for an accident.

I therefore propose that this area be adjusted back to the 2003 boundary, and so be protected once again as greenbelt land, to ensure that these fields remain as open spaces and that Guildford Borough Council takes on its environmental responsibility to keep central Shalford as rural as possible. As a resident and member of the Shalford Tennis club I urge you not to allow the loss of this lovely green land which is so important in helping Shalford to remain a village, and retain its wonderfully green backdrop which is so important to ensuring it retains its full character.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to ANY removal of any villages from the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
leading up to the roundabout in Shalford from both the main road from Wonersh and also from Chinthurst Lane. Furthermore, Chinthurst Lane is not an easy road to negotiate either as a driver or a pedestrian, with very narrow stretches, sharp/blind bends and no pavement in places, so to add even further traffic to such a road would make it even more of a danger to both kinds of user.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17017  Respondent: 10653537 / Mike Elrick  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1 Green Belt - support proposals

1.1 Notwithstanding a comprehensive evidence base, circa 20,000 objections led to the demise of the original Local Plan. Given the scale and content of those objections, it is unlikely to be resolved by the current draft Plan. However, it is clear that the officers have done their very best to try to resolve this long standing problem. There must be some building in the Green Belt.

1.2 The Government has done nothing to ease the situation with its repeated public statements promising to "protect" the Green Belt. However, a recent Court of Appeal judgement (Mar 2016) has resulted in many more successful applications and appeals. Lack of a 5 years housing supply means that other policies previously restricting housing are now deemed to be "out of date".

1.3 I am not aware of any other LPA’s having proposed a "traffic light" classification for Green Belt land. The only conceivable reason for incorporating such a system is to ease housing pressures by building on areas with the the lowest classification (such as Send Hill Farm) However, it is likely that NIMBYs and bodies such as CPRE will object to this, quoting the original, but now outdated, Green Belt rationale

1.4 GBC development control continues to refuse Green Belt applications for the flimsiest of reasons. This is easily seen by the increased number of appeals being allowed and also by the successful applications for appeal costs against the Council.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/757  Respondent: 10655361 / M Trevill  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO ALL EROSION OF THE GREEN BELT – It is vital for our health our childrens health and to preserve the very nature of our area’s NATURAL beauty and wildlife.

1] I OBJECT TO all erosion of the Green Belt – especially RIPLEY

2] I OBJECT TO ANY removal of any villages from the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
POLICY P2 – Green Belt

I OBJECT. This policy is tepid in support of the Metropolitan Green Belt even though it constitutes 89% of the borough and should be the cornerstone of all local planning policy. It is precious beyond the short-term demands of the present Government’s policy or a 15-year local plan. As noted under Policy S1 above, it is a solemn legacy to future generations – an asset and amenity that belongs as much to Londoners and the wider nation as to the people who live in it. It is not the Council’s to give away, and once it is gone it is gone forever.

Any policy on the Green Belt should start with a fair assessment of its value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. Building on it involves high opportunity costs, including an irreversible loss of:

- Agricultural production
- Rural leisure and tourism amenities
- Water catchment
- Flood control
- Biodiversity
- Natural heritage
- A carbon sink for air pollution
- Room for public facilities such as parks and burial grounds
- Profitable film locations (e.g. Shere)
- Future economic potential such as mineral extraction (even fracking)
- Natural beauty, landmarks, open space, rural views and sight lines
- Benefits to public health and wellbeing, physical and psychological (as well expressed in the NPPF)[1]

As a matter of law, morality and national and local policy, these assets should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation.

It is disreputable to argue, as the Council does, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. No-one argues that we should sell 1.6% of British Museum artefacts in order to build houses.

I am not opposed to appropriate development in the Green Belt and recently supported a major planning application in my own village. But I fail to see why a system of fair burden-sharing of new development cannot be applied to the borough’s existing settlements in proportion to their size. This would minimise the strain on infrastructure and maximise the chances of retaining the character of each settlement through gradual growth. It is reasonable to ask urban Guildford, with x times the population of semi-rural East Horsley for instance, to accommodate x times the number of new homes over the plan period. Parish councils could be asked, and would no doubt be willing, to propose where their quota of houses should go. Most rural residents are reasonable people who, if not alienated by top-down planners, will support realistic numbers of new houses in their neighbourhoods. Unfortunately, this democratic, bottom-up approach has not been attempted.

Instead, while developers flip and land-bank urban sites as a financial speculation, this plan will dump most new development on greenfield sites where building costs are lower, covering the Green Belt with dozens of housing estates few residents want. 8,086 new houses are planned for the Green Belt but only 1,135 for Guildford urban area. This is
disruptive, socially inequitable and unnecessary. It will not only destroy countryside but will also delay and disincentivise much-needed urban regeneration. The remarkable revival and repopulation of central London shows that building dormitory satellite settlements is an out-of-date approach to planning.

I particularly protest at the “insetting” of 14 villages from the Green Belt, and at “infilling” 12 Green Belt villages. I am deeply disturbed that settlement boundaries are to be hugely extended in many villages and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are “leggy” in outline, reflecting the effect of ribbon development (often along just one side of existing roads) permitted between the Wars. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost hellbent on securing the rejection of the plan as a whole.

I believe this policy is based on a flawed Green Belt and Countryside Study that, according to one Conservative Councillor, was irregularly commissioned by Council officers without the authority of Councillors.[2] To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, although they would quickly defeat them if the proposed “insetting” and boundary extensions go ahead. This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.[3]

The policy states that “the general extent of the Green Belt has been retained.” This is not true.

[1] See Ministerial foreword: “Our natural environment is essential to our wellbeing, and it can be better looked after than it has been. Habitats that have been degraded can be restored. Species that have been isolated can be reconnected. Green Belt land that has been depleted of diversity can be refilled by nature – and opened to people to experience it, to the benefit of body and soul.”


What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
It is not appropriate to inset from the Green Belt the village of Chilworth. This village is surrounded by Areas of Great Landscape Value and Outstanding Natural Beauty which should be permanently protected to prevent urban sprawl and inappropriate development.

The area immediately around it is open countryside and the village is overlooked by beauty spots of St Martha's Hill and Newland's Corner. Furthermore, it contains the important Gunpowder Mills area which is an historic site and natural wildlife area. This whole area should therefore have special protection and there is no justification for taking it out of the Green Belt.

I object to any building on green belt land, this must not be allowed.

I object to any changes to green belt boundaries. This cannot be justified by any special circumstances.

3. I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick's Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional
circumstances for these villages (as mere housing need does not constitute a 'special circumstance' the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick's Arch, so there is no evidence base to support including this site. Rather than developing Garlick's Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/1303  **Respondent:** 10668897 / Mary Harris  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the plan proposing that the majority of new houses to be built will be built on The Green Belt. My understanding is that is that over 70% of the proposed houses will be built on Green Belt land rather than on Brownfield land. This is in direct contradiction to Government Policy. I therefore object to the continued inclusion in the plan of the Three Farms Meadow.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/14000  **Respondent:** 10670529 / Jennifer McIndoe  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

I object to all erosion of the Green Belt

I object to any "in-setting" (ie removal) of any Send, Ripley, Wisley and Clandon from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/5916  **Respondent:** 10672417 / Matthew Kalupka  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to not protecting the Green Belt (Policy P2)
I object to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick's Arch (A43).

National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a 'special circumstance' and the land to be taken from the Green Belt. Once taken the Green Belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC's Green Belt & Countryside Report does not address Garlick's Arch, so there is no evidence base to support including this site.

Rather than developing Garlick's Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/13752</th>
<th>Respondent: 10682529 / Paul Edwards</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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<td>Once the green spaces are taken, they can never be brought back and our country will forever be poorer and a less pleasant place to live.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<tr>
<th>Comment ID: PSLPP16/4798</th>
<th>Respondent: 10683457 / Margaret Bruton</th>
<th>Agent:</th>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<tr>
<td>Consultation for Guildford Local Plan June 2016</td>
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<td>I submit the following objections to proposals in the Local plan affecting the settlements of Send/ Send Marsh/ Burnt Common.</td>
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<tr>
<td>1. <strong>Insetting Of the Send village within the green be</strong></td>
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<td>I wish to object to this proposal as it makes available for development a significant number sites in addition to those specifically identified in the Local Plan. Sites such as the land behind Heath Drive and soon to be redundant ST Bede’s school buildings could be used for housing. This will significantly change the nature of the village from a rural setting to an urban environment. Furthermore, this will place additional strain on the already limited infrastructure where the village schools are full with no additional capacity. The Village Medical Centre is also full and the roads are already over capacity. Public transport is already very limited with no late evening or Sunday service. Further development in the village will visually impact the Wey Navigation Corridor, a major local and national asset.</td>
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</table>
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/16468  **Respondent:** 10692833 / Elizabeth Cope  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

As a resident of Riley Village, I am deeply concerned about the proposal for Ripley, Send and Clandon to be removed from the Green Belt. I object to this proposal as the risk of the London urban sprawl and the absolute need for the protection of rural Surrey, is now of paramount importance. It is beyond belief that Local Authority Planners do not immediately see the priority of such protection.

I am equally concerned that the loss of the Green Belt in these areas is simply a device to allow impediments in National Planning policy to be removed in relation to the proposed development sites at the former Wisley Airfield and Garlicks Arch in Send. National policy permits the loss of the Green Belt in only **exceptional circumstances**. There are no such circumstances in relation to these sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/395  **Respondent:** 10701409 / Marilyn Squires  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I wish to lodge my objection to the above proposal for the following reasons.

Firstly in broad principal I believe the Green Belt is more necessary now than when first implemented as without it, there will eventually be no distinction between town and country as the urban sprawl continues unabated and our countryside is lost forever.

Secondly, in more specific terms, I object to the proposed building of over 500 houses in Horsley as the infrastructure simply cannot cope with such an increase in population. In the winter of 2014/15, in order to walk my dogs locally in Green Lane, I had to wade through raw sewage spilling out onto the road for weeks as the sewers overflowed because they could not cope. A proposed build of 120 homes nearby would obviously cause this to be a permanent and unacceptable problem. Such a large development would also adversely effect the character of the existing village, which seems to have been conveniently overlooked.

The village shops and library already have times when there are no vacant parking places, and many residents do not have access to these amenities apart from using a car.

The doctors surgery in Kingston Avenue (the only GP service in Horsley) obviously struggle to give out appointments within a reasonable length of time already, as I have rung them for an appointment quite recently only to find the soonest they could offer one was in 9 days.

Ockham road north is already very difficult to drive out into or from houses alongside it due to limited vision, narrow width and bends, so any increase in traffic volume which would effectively turn it into an A road instead of a B road would make it even more dangerous.
I would like to point out that finding land on which to build is only a part of a development plan – the infrastructure must be in place to accommodate it, which isn’t the case in Horsley.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/13440</th>
<th>Respondent:</th>
<th>10701537 / Ben Gamble</th>
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1. I object to not protecting the Green Belt (Policy P2)
2. I object to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43).
3. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

Brandon Lewis, the Minister of State for Housing & Planning wrote to all Members of Parliament on 7 June 2016. In the letter, which is attached, he stated that the demand for housing along will not change Green Belt boundaries.

There is a really danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages of Ripley, Send and Clandon will merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. All these factors should carry such weight that the sites at Wisley Airfield (A35) and Garlick’s Arch (A43) are excluded from the Plan.

70% of the sites put forward in the Local Plan are in the Green Belt which flies in the face of current government planning policy. The National Planning Policy Framework (NPPF), National Planning Policy Guidance and case law make it clear that Green Belt is an absolute constraint on housing supply. Exceptional circumstances need to be shown to adjust boundaries.

Rather than developing Garlick’s Arch, there is just to the south of the site at Burnt Common an existing brownfield site, with surplus land that could accommodate a further development. This would be a far better and more acceptable solution.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents: [BrandonLewis Letter.pdf](#) (1.9 MB)

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<tr>
<th>Comment ID:</th>
<th>PSLPP171/451</th>
<th>Respondent:</th>
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I object removing Send Business Park from the Green Belt (4.3.15).

Send Business park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for it’s insetting (removal) from the Green Belt, and indeed GBC have not even attempted one. Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>Comment ID: PSLPP16/3840</th>
<th>Respondent: 10702561 / Emily Gamble</th>
<th>Agent:</th>
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</table>

3. I object to not protecting the Green Belt

The Green Belt of beautiful English countryside is a priceless jewel which once built on will be irrevocably lost forever.

I object to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). This contravenes National Planning Policy, as this requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or for development on Green Belt. There are no exceptional circumstances for these villages and the land to be taken from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/143</th>
<th>Respondent: 10713953 / P Smithers</th>
<th>Agent:</th>
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I strongly object to the Green Belt status being eroded away from Send Village. I appreciate more housing is required but there are a number of brown fill land sites in the borough on which to build.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: pslp171/937</th>
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Green Belt, Policy 2 at Paragraph 4.3.15

I object to the proposal to inset Send Business Park from the Green Belt because it is in a restricted vehicular access area along Tannery Lane from both directions and further expansion and development is not in keeping and will detract from the openness of the area. The existing infrastructure is not sufficient to cope with any increase in traffic and building development. It will seriously impact the area of outstanding building along the Wey Navigation, which my family and friends have enjoyed for many years.

My wife and I have lived in Send in excess of 24 years. I originally grew up in Send and we chose to return to the village to enjoy our retirement. We have family and friends living close by, including both my daughters and grandchildren, all
of whom regularly visit us. The proposals above would considerably change the way of life in the village and surrounding area, we along with many others chose to buy in Send because of its village environment and rural setting, away from built up areas. We live in Potters Lane and are impacted every day by commuters speeding through to and from the A3, both my wife and I and are family have had our cars damaged from cars speeding past and not keeping to their lane and clipping our cars.

I appreciate more housing is required but there but are a number of brown fill land sites in the Borough on which to build. I strongly object to the Green Belt status being eroded away from Send Village. I do hope you will take my comments on board along with the many other residents of Send who very much care about their village and its surroundings and who have lived in the village for many years.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/1509  **Respondent:** 10717985 / Alison Drennan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( No ), **is Legally Compliant?** ( )

I object - as the Green Belt forms an overwhelming proportion of the Borough the Local Plan should place its protection as the forefront of it's policies. To state: 'We will continue to protect the Metropolitan Green Belt, as shown on the proposals map, against inappropriate development' is patently untrue. Protecting the Green Belt is not a priority of this Local Plan.

I object - to state: 'In accordance with national planning policy, the construction of new development will be considered inappropriate and will not be permitted unless very special circumstances can be demonstrated" is patently not shown in the Local Plan. GBC fails to demonstrate special circumstances and is planning excessive and very inappropriate new development in the Borough and patently failing to identify and prioritise the use of brownfield sites within urban areas.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/4357  **Respondent:** 10717985 / Alison Drennan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

Objections to GBC Local Plan - Consultation, 2016

I am writing in response to the Local Plan, and wish my objections to be seen by the Planning Inspector. I have been onto the GBC website to make individual objections to the many worrying and troublesome suggestions included in the Local Plan.

In this letter I wish to express my deep concerns and objections to local issues as a resident in Send and the impact of the inappropriate and excessive development proposed in the Local Plan on our village, quality of life and future.
My greatest concerns are to do with the removal of Send and other villages from the Green Belt and the detrimental and irreversible effects this will have. Local residents have consistently campaigned against this – neighbours and other villagers I talk to are determined to do so still. This removal goes against Government guidance (National Planning Policy Framework), which states the presumption is not to build on Green Belt unless exceptional circumstances are provided to warrant this. GBC patently fail to do this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4358  Respondent: 10717985 / Alison Drennan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

• I object to GBC going against Government guidance in their proposals to build on Greenbelt land and failing to provide exceptional circumstances to justify this. Presumption is not to build on Green Belt unless exceptional circumstances are provided to warrant this. GBC patently fail to do this.
• I object to GBC proposals to build on Green belt areas whilst failing to first identify sufficient brownfield sites within urban areas.
• I object to all proposals to build on Green belt land in the borough. Urban brownfield areas could accommodate all the true and required development that is needed and such sites are close to existing transport systems and links to support such development. NO such road infrastructure exists in the villages.
• I object to GBC failing to provide a considered, appropriate local plan and future for our borough by neglecting to include the Town Centre Masterplan.
• I object to removing Send, Ripley and other villages from the Greenbelt. Our village provides a necessary, beautiful and irreplaceable buffer between Woking and Guildford.
• I object to the proposal that 70% of 13,860 houses in the plan are suggested to be located with the Green Belt along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/74  Respondent: 10717985 / Alison Drennan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Green Belt, Policy 2 at paragraph 4.3.15

I object to the proposal to inset Send Business park from the Green Belt development at this choice of location is inappropriate and detracts from the openness of the area.

I object to this proposal because there in restricted access for traffic in Tannery Lane. Increased traffic that would result from development will compromise the safety of these roads and road users. It will also lead to further traffic delays and congestion in the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Objections to Local Plan - Policy changes P2, Green Belt

1. I object to the changes to the policy as they disregard the numerous objections (over 30,000) made to the 2016 plan.
2. I object to the change that is the addition of this new paragraph 1, which begins: "The Metropolitan Green Belt will continue to be protected ... against inappropriate development". In accordance with National Planning Policy the construction of new development will be considered inappropriate and will not be permitted unless *exceptional circumstances can be demonstrated*. As before Guildford Borough Council completely fail to demonstrate such circumstances and pay lip service to protecting the Green Belt, whilst presenting a Local Plan that proposes to degrade it and by building over it.
3. I object to the change and GBC's under-estimate that the plan would only involve the loss of "1.6%" of the borough's Green Belt. The actuality of it is when taking into account changes such as insetting, (e.g. Send Business Park) infilling and boundary extensions are accounted for the figure is nearer 7%. NO building on the Green Belt is necessitated in the Borough when the incorrect and unreliable date that GBC suggest is "housing need" is closely examined and disregarded as invalid. NO *exceptional circumstances* are provided by GBC to go ahead with this change. As before GBC have failed to demonstrate - using valid and reliable data - justification for this disproportionate increase in housing in our village, confusing need with demand - a basic error.
4. I object to changes in this policy as GBC have failed to "fully, appropriately and meaningfully engage with local residents and neighbourhoods" (National Planning Policy Framework NPPF 2012) as it has previously claimed it will aim to do. If this had occurred the changes in the policy would not be proposed as GBC would have taken account to the many objections voiced in the past.
5. I object to the changes re: numbers, areas etc, because building on the Green Belt does not: "*preserve the openness of the Green Belt*".
6. I object to the statement which states that Send and other villages are now: *inset from the Green Belt*. This is merely a statement of intent issued by GBC and has not been improved by an Inspector, it is therefore untrue and should not be use as a basis for planning, particularly taken into account strength of local feeling, number of objections and no *exceptional circumstances* being provided for development by GBC.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Green Belt

There are no “exceptional circumstances” that justify the proposal to remove the Horsleys from the Green belt. If nothing else, this makes a mockery of the system in place that provides necessary protection to our countryside and way of life. Neither the council or the planners have provided any valid justification for this in my opinion. It would also set a very dangerous precedent. **Expect your constituents to revolt in great numbers if this proposal goes further!!**

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/587  **Respondent:** 10718625 / Zareena Linney  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

Re I would like this objections to be seen by an Inspector.

I object to building proposals for Send and anymore development of housing in the area. Send provides essential greenbelt land for animals and wildlife which should be protected, it lies between Guildford and Woking and these are two large towns so these green spaces and preserving them are important.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp171/447  **Respondent:** 10718625 / Zareena Linney  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

Lastly I object to the Green belt policy 2 at paragraph 4.3.15, i.e. to inset Send Business park from the Green Belt, there is restricted access in Tannery lane, both ways and further expansion would harm the outstanding countryside, through pollution and building. Affects the countryside and the beautiful wet navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/2665  **Respondent:** 10719297 / Stewart Fenton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

In respect to the Guildford Local Plan in general:

I object to the local plan on the grounds that the greenbelt has not been afforded the protection it deserves. We have a duty to protect it, but the local plan only pays it lip service. There is no attempt to use it as a constraint when establishing the borough's housing needs, despite government guidance that it can and should be.
The greenbelt is a solemn legacy to future generations – an asset and amenity that belongs as much to Londoners and the whole nation as to the people who live in it. It is an inalienable public good. Once gone it is gone forever. It is not the Council’s to give away.

Building on it will lead to an irreversible loss of:
- Agricultural production
- Rural leisure and tourism amenities
- Water catchment
- Flood control
- Biodiversity
- Natural heritage
- A carbon sink for air pollution
- Room for public facilities such as parks and burial grounds
- Profitable film locations (e.g. Shere)
- Future economic potential such as mineral extraction (even fracking)
- Natural beauty, landmarks, open space, rural views and sight lines
- Benefits to public health and wellbeing, physical and psychological (as well expressed in the NPPF)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5179  Respondent: 10720833 / S Bryon  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO ALL EROSION OF THE GREEN BELT

I OBJECT TO THE REMOVAL OF ANY VILLAGES FROM THE GREEN BELT

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3560  Respondent: 10721089 / Y Beraud  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Re THE FINAL DRAFT LOCAL PLAN for SEND

I WISH MY FOLLOWING COMMENTS TO BE SEEN BY THE INSPECTOR

Green Belt is defined as open space for the purpose of:
- Stopping urban sprawl to protect the character of rural communities.
- To provide clean air for outdoor activities.
- To maintain wooded areas and to provide wildlife habitat.
To assist in safeguarding the countryside from encroachment.

Any planning for the change of use for Green Belt should demonstrate why normal planning and development would not be adequate and should show proof as to why the current plans have made the adoption of this exceptional measure necessary.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3561  Respondent: 10721089 / Y Beraud  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to policy P2 the proposal to remove Send from the Green The use of the Green Belt Areas for development means local villages will join up and become an urban sprawl and form a Suburbia. The new local plan is to remove 15 villages from the Green Belt this includes RIPLEY and SEND. A huge development such as this will limit the ability to mitigate climate change and weather events such as flooding.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8516  Respondent: 10721473 / David French  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to your plans to remove some of Send from the Green Belt which was intended to be permanent, as required by the NPPF. There are no exceptional circumstances which warrant this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7810  Respondent: 10721537 / Stephen Niblett  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the removal of Send from the Green Belt because it helps to separate the village and surrounding country side from Woking and Guildford dense housing.

I object to the building on the Green Belt at Send at Garlick’s Arch, Clockbarn Nurseries and Send Hill because it is not justified by any special circumstances as already exist a permanent site at Slydefield which doesn’t endanger the erosion of the current Green Belt.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/7695  **Respondent:** 10721601 / Vivienne Holden  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- I object to removal of Send Village from the Green Belt
- I object to removal of Ripley and Send Marsh from the Green Belt
- I object to removal of Ripley from the Green Belt

The previous draft local plan was withdrawn after generating widespread local opposition. Our Mole Valley MP Sir Paul Beresford responded to that; a copy of his comment dated 21 September 2014 is enclosed. His document retains its validity. Sir Paul observed:

"This catalogue of errors and omissions has led to a situation in which the Local Plan as presented has no detectable support from Guildford residents and has managed only to anger and worry so many of those who stand to lose the unique and valuable rural village lifestyle they currently enjoy in the Mole Valley Wards of Guildford Borough".

Sir Paul's commentary applies to the revised plan as do other submissions in response to the last draft plan (including my own earlier letter which I attach as well). I object to the revised plan generally for all of the reasons cited in my 19 September 2014 letter in respect of certain sites then earmarked.

I object to this new or second Draft Local Plan (as Sir Paul anticipated it) because Guildford Borough Council still has not recognised local feeling and opinion in formulating it. I object to the failure to consult in any responsible way and to the approach taken for all of the reasons recited by Sir Paul which seem to have been ignored in compiling the new or second Draft Local Plan.

Our infrastructure in Send, Ripley and Send Marsh and Clandon being already overloaded such that the smallest disruptions cause gridlock over much of our essentially rural roads network please also note that:

- I object to an expanded A3 interchange at Burnt Common,
- I object to housing and business development proposed for land described as Garlick's Arch,
- I object to housing development at Clockbarn Nursery,
- I object to housing development at Send Hill,

all of these sites being unsuitable and in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/9123  **Respondent:** 10721601 / Vivienne Holden  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I write as required ahead of 18 July 2016 to object to the Draft Local Plan currently available for comment. Please confirm receipt of this letter and take regard of my submissions as follows:

- I object to removal of Send Village from the Green Belt
I object to removal of Ripley and Send Marsh from the Green Belt
I object to removal of Ripley from the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17907  Respondent: 10722049 / Richard Smith  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to the failure to protect the Green Belt in accordance with Government policy (Policy P2)

I object to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be exceptional circumstances for the Green Belt boundaries to be altered, or for development on the Green Belt. There are no exceptional circumstances for these villages to be taken out of the Green Belt as mere housing need does not constitute a ‘special circumstance’. Land taken from the Green Belt is lost forever.

There is a real danger that the loss of this Green Belt will result in further urban sprawl and will result in these neighbouring villages merging into one another. The development of Guildford effectively up to the M25 will in fact be the first step in the spread of the existing urban sprawl that is London to an area outside the M25. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support the inclusion of this site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/591  Respondent: 10722593 / D.C. Johnson-Webb  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing to object to the Local Plan 2016-06-13 and I would like my comments to be seen by the Inspector.

It would appear that far from looking after the interests of the rate payers, Guildford borough Council would ride roughshod over their interests with gay abandon.

I object to the way the council have changed the plans for Send after the original plan was put forward.

I object to various villages being removed from the Green Belt particularly Send Village policy P2

I object to the proposed building of 40 homes and 2 travellers Pitches on land west of Winds Ridge
and Send Hill. This is a land fill waste site which is currently vented there is also poor access to the site due to single track country road one end and the school the other end. Policy A44. 1.9 ha ~to huge development at Garlick's Arch, Burnt Common. This is another development just slipped in without the necessary consultation. The roads around the area are already blocked during rush hour periods and they are not built to cope with the amount of heavy traffic already using them. Apart from a major junction at Burnt Common there does not appear to be any further improvement to the roads in the area. The A3 is already grid locked North and South Daily.

I object because no one seems to have considered how much water and sewage will be used and generated by all the properties proposed for this whole area including Ripley, Send, Wisley, Clandon. How are all these new homes and businesses to be serviced? What about Policing, Fire and Ambulance services. The Dr's Surgery is already struggling as is the hospital.

As council you are a disgrace, all promises when you want our votes at election time and then a total disregard for us as you try and tear down our village communities and way of life.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5897  Respondent: 10722689 / D.M. Johnson-Webb  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to various villages being removed from the Green Belt particularly Send Village policy P2

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/70  Respondent: 10722689 / D.M. Johnson-Webb  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Green Belt Policy 2 at paragraph 4.3.15 to inset Send Business park from the Green Belt down to the River Wey with no decent access to Tannery Lane in either direction.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4953  Respondent: 10723073 / M. Perryman  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to removal of Send and other villages from the green belt. This can only be done in exceptional circumstances according to law, for which none exist in this area. The interests of developers profiting from indiscriminate urban development are not exceptional circumstances.

Any weakening or exceptions made to green belt protection will lead to its demise, and once it is gone there is no going back. The green belt must be protected in its entirety, according to current law, as the lungs of the south east, and an area to be enjoyed by millions including tourists from abroad.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/305  Respondent:  10723201 / R Mutton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the way in which the Council has tried to implement new proposals in terms of numbers of houses, a new road junction off the A3, never before been mooted and all without carrying out a full consultation under regulation 18. This "sharp" effort to short cut the due process invalidates the process and does not shed any credit on the council or its planning department. I wonder just who has been advising you.

I would also point out there has been no evidence presented to support the Employment Land Needs Assessment 2015 (ELNA). I object to this as there is no need for industrial space at Burnt Common and in fact an 80% reduction has been shown since the previous ELNA was carried out by you in 2013.

Further more I object to the way in which the Strategic Housing Market Assessment 2015 (SHMA) has been inflated by it would seem foreign students. Can you not see that your supposed requirement for 13,860 houses in the local plan is an exaggeration? I object to the way you are hell bent on overloading the infrastructure around Send, propose including large amounts of the Green Belt in the development area and by this proposal the villages will become an urban sprawl, joining Guildford and Woking.

Your Policy A43 Garlick Arch is a new one, not included in the Regulation 18 draft has not been consulted on previously as has not Policy A44 which is entirely inappropriate in all its features. A landfill site with documented unsafe waste beside a narrow road is not a sensible proposal for 40 homes and travellers pitches. I most strongly object to this.

All in all there has not been consideration for the residents who will be confronted with a vast increase of traffic, a despoliation of some beautiful countryside and the prospect of seeing ancient woodland in a conservation area destroyed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/790  Respondent:  10723425 / Eileen Nolan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Green Belt Policy 2, paragraph 4.3.15, insetting on the Send Business Park from the Green Belt and its designation as a strategic employment site, as this will add further pressure on to Tannery Lane and Papercourt Lane. It seems implausible that this Local Plan seeks to expand the Business Centre and development 60 homes in a small, narrow and dangerous rural lane for traffic. The junction with Send Road off Tannery Lane is also very dangerous and given a current planning application to build three story flats on the former JB motors garage site, on the corner of Tannery Lane to Send Road, the Local Plan proposals will only add to these problems.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11704  Respondent: 10723553 / Judith Pound  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to not protecting the Green Belt (Policy P2).

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43). There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed. The Green Belt in this area provides an essential buffer which prevents Woking and Guildford from becoming one conurbation. It is meant to be permanent and not continually eroded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16813  Respondent: 10723553 / Judith Pound  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1) I OBJECT TO the eradication of the local (or in fact any) Green Belt. The Green Belt has been assigned for the specific purpose of preventing urban sprawl and to protect the nature and identity of local villages, something that is highly important. Indeed the National Planning Policy Framework (NPPF) states that the construction of new buildings should be regarded as “inappropriate” for the green belt. Eradicating Green Belt is short term idiocy, ruining our country for future generations.

2) I OBJECT TO any “in-setting” and removal of any villages from the Green Belt – this will cause the loss of identity and community of our villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1389  Respondent: 10723553 / Judith Pound  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to Policy P2 Clause 4.3.15 — This is a pretty stretch of the River Wey and should remain protected within the Green Belt. Tannery Lane cannot withstand more traffic— it is too narrow and the area is unsuitable for further expansion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1775  Respondent: 10723553 / Judith Pound  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Comment ID: PSLPP16/6972  Respondent: 10724769 / P. Broughton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Comment ID: PSLPP16/4841  Respondent: 10725537 / D. Warriner  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Comment ID: PSLPP16/4778  Respondent: 10725729 / Annie Hotson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
• I object to the building on the Green Belt at Send at Garlick's Arch, Clockbarn Nurseries and Send Hill because it is not justified by any special circumstances and the fact that Green Belt is meant to be permanent and not continually
• I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford's urban brownfield areas much closer to existing transport hubs.
• I object to the large proposed development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.
• I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are already at 100% capacity.
• I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/76  Respondent: 10725729 / Annie Hotson  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Green Belt Policy 2 at paragraph 4.3.15 There will be such a traffic problem, Tannery Lane is just that. A LANE. We already have such a problem with traffic that all this makes us think that the people that came up with this Plan and its changes have not even come and looked at the sites that they are planning on ruining.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4774  Respondent: 10725793 / Ken Hotson  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

• I object to the building on the Green Belt at Send at Garlick's Arch, Clockbarn Nurseries and Send Hill because it is not justified by any special circumstances and the fact that Green Belt is meant to be permanent and not continually
• I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford's urban brownfield areas much closer to existing transport hubs.
• I object to the large proposed development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.
• I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are already at 100% capacity.
I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/75  Respondent: 10725793 / Ken Hotson  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Green Belt Policy 2

Development at this location is just not practicable as the roads are not made for this kind of traffic.

There are many reasons why Send and Ripley should not have to loose their green belt and to increase in size so drastically, but all of those reason were submitted in our objection to the local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/597  Respondent: 10726369 / A. Watson  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Green Belt, Policy 2 at paragraph 4.3.15

Send Business Park now taken out of the Green Belt altogether.

I object to the proposal to inset Send Business Park from the Green Belt because it is effectively an old non-conforming user in an area of outstanding countryside, adjacent to the beautiful Wey Navigation. There is highly restricted vehicular access along Tannery Lane in both directions and further expansion of development at this location detracts from the openness of the Green Belt and is inappropriate.

[I am appalled that Guildford Borough Council's Local Plan 2017 is a clear failure of proper planning process.] Instead of making any real attempt to mitigate and amend the plan, Guildford appears to have shouted down our objections and refused to alter its proposals to take account of those objections. Allowing for the fact that we need more houses, Send has been targeted disproportionately for development. Pollution kills twice as many people in Britain than the US and 64 times as many as in Sweden, according to the World Health Organisation. I want to do my best to protect my village from an unfair imposition of toxins from over development and destruction of the lungs of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/273  Respondent: 10726497 / David Ian Ness  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- I object to the Green Belt Policy 2 (paragraphs 3, 4 & 15)
- Send Business Park should remain in the Green Belt. It adjoins farming land currently being used to grow crops.
- As I have previously stated in this letter, Tannery Lane is not suitable for any further development and should remain in the Green Belt unless there are other motives that we are not aware of!!
- The land behind the business park is a 'flood plain' flood relief for the River Wey, and created by nature itself! It is a safe haven for many types of wildlife

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1959  Respondent: 10726561 / L. Boyle  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy P2. The removal of Send from the Green Belt because the village and its countryside provides a necessary buffer between Woking and Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1960  Respondent: 10726561 / L. Boyle  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1961  Respondent: 10726561 / L. Boyle  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to all proposals to build on the Green Belt at Send because all the development that is required can be accommodated in Guildford's urban brownfield areas and is much closer to existing transport hubs.
The whole destruction of the Green Belt in this area is in clear contravention of the central government's stated commitment for Green Belt Protection.

I would hope that all my objection points listed above will be taken into consideration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/444  Respondent: 10727009 / A. Elms  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to any erosion of Send’s Green Belt status under Policy P2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/859  Respondent: 10727009 / A. Elms  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

In the publication 'About Guildford' sent out by Guildford Borough, there is the statement 'Over 89% of our borough is within the green belt'. Why are GBC proposing to remove Send altogether from the Green Belt? Why aren't GBC fighting to keep Send in the Green Belt?

Why has Send been disproportionately hit by development? Is it because the majority of the Councillors/Officials involved live in a different area, rather than in the Send Area? Is there corruption involved with links with building companies?

The village of Send must be preserved in its village identity to prevent there being an urban sprawl between Guildford and Woking.

I object to any erosion of Send's Green Belt status under Policy P2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11883  Respondent: 10727457 / Colin Eke  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- I OBJECT to the impact on the greenbelt status of the villages
I OBJECT TO the proposal to remove Send from the Green Belt. The Conservative manifesto promised to protect the Green Belt if elected! This village provides a green lung between Guildford and Woking. It is a pleasant area and unrestricted development would change it forever. Residents have chosen to live here because of the rural aspect and this would be destroyed.

I personally object to Send village being removed from the Green Belt. When the Green Belt was set up it was to be permanent, not to be changed in any way, therefore the word is and remained PERMANENT until recently.

Please think again, because if you change the Green Belt status and the lovely community of Send, it will be gone forever.

1. I object to all erosion of the Green Belt.
2. I object to any insetting of any villages from the Green Belt.

1. I OBJECT to any likely destruction of woodland inside and outside the Green Belt.

REASON: Much of the Green Belt and outlying area consists of woodland. The roots of mature trees reach deep into the soil which produces a function similar to a sponge; this collects rain water, REDUCES RUN OFF, and will LESSEN RISK OF FLOODING. The upper branches and leaves of trees provide a filter from airborne pollution emitted in exhaust fumes from vehicles.
I OBJECT to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6389  Respondent: 10728993 / Gill Love  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6531  Respondent: 10729281 / Richard Croxford  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to all changes being made to the definitio n and boundaries of the existing Green Belt areas. I understood that such areas are in place with the intention of providing permanent protection, as set out by Councillors and central Government. Green Belt areas prevent excessive "urban sprawl", provide a natural balance between towns and countryside, and contain much valued wildlife.

I object specifically to the proposals to move Send from the Green Belt. I believe that this is senseless, as Send-like Ripley-is a village. Even the local GP surgery is named 'The Villages'. Proposals to redefine it as a small town, and to re-draw the Green Belt boundaries via 'insetting', should be dismissed. I understood that 'special circumstances' were required before any Green Bell could be re-designated - none appear to exist here.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1327  Respondent: 10729345 / M. Osborn  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Green Belt Policy P2 at paragraph 4.3.15 to inset Send Business park from the Green Belt. Tannery Lane and Papercourt Lane are narrow and two vehicles cannot pass. It is unsuitable site for expansion on the scale proposed in the draft 2017 Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/445  Respondent: 10729473 / P.T. Elms  Agent:
<table>
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<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
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<tr>
<td>Please ensure my objections are put before the Planning Inspector.</td>
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<td>I object to the removal of Send Village from the Green Belt altogether.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td>3) I object to Green Belt Policy P2 at paragraph 4.3.15 to inset Send Business Park from the Green Belt.</td>
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<tr>
<td>3.1) I object to Policy P2, paragraph 4.3.15 and designation of the Business Centre as a strategic employment site because this has not been subject to a full review of flooding in accordance with NPPF guidelines. GBC’s Level 2 Strategic Flood Risk Assessment (May 2016) does not include an assessment of this area.</td>
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<td>3.2) I object to this policy change as this is an area of high sensitivity Green Belt land as set out in the Green Belt and Countryside Topic paper, paragraph 4.38. It was on this basis that the Business Park and the adjoining site 67 (see 2014 draft of the Local Plan) were removed. Without sufficient justification the Business Park and the adjoining land (site 67) are once again included on the basis that existing infrastructure is in place and it means it is appropriate for development. In practise, however, Tannery Lane and Papercourt Lane are narrow and lack any pedestrian paths. Moreover, whether or not existing infrastructure is capable of servicing the proposals for the Business Park, this still does not present a robust case for removing the Business Park from the Green Belt when GBC consider it high sensitivity Green Belt.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<tr>
<td>I object strongly to Send Village being removed from the Green Belt. It clearly provides opportunities for people to access open countryside and nature conservation. Send is surrounded by open fields and has an &quot;open character&quot; thereby making an important contribution to the openness of the Green Belt. If Send village were to be removed from the Green Belt it would illustrate a clear renege by both local councillors and central government to protect the Green Belt. Furthermore it would open the door for developers to take advantage of this lack of protection through Green Belt status.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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</table>
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

In particular

- I object to Send being removed from the Green Belt as I believe that this will allow the Council to approve future developments more easily, resulting in unacceptable levels of congestion and unbearable pollution to the area

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9479  Respondent: 10729985 / T. Newton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I have received your outlined plan for changes at Burnt Common, Ripley, Wisely and Send. Clandon

I do strongly object. Very strongly object this surely is green belt land which you and our government promised not to take for buildings etc. A promise not being kept – shame – who can we trust?

I object to all erosion of Green Belt.

I object to disproportionate amount of development in one area of the borough

I object to the limited consultation period.

In fact I do object to the 2016 draft local plan which doesn’t have thinking about

So please re think your plan and don’t take the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2568  Respondent: 10731233 / Linda Aris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the removal of green belt land in the villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10833  Respondent: 10731329 / Sheila Hookins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
**Comment ID:** PSLPP16/11762  **Respondent:** 10731361 / Joan Bagnall  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to all insetting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp171/325  **Respondent:** 10731361 / Joan Bagnall  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Firstly I object most strongly to the proposal to remove the villages of Send and Ripley from the Green Belt. Green space between settlements is of utmost importance for the physical and mental health of the population. The corridor along the river Wey is an area greatly enjoyed not just by boaters but also by walkers and cyclists and is important as a buffer for wildlife. If these two villages are removed from the protection of the green belt Woking will very soon become joined to Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/13164  **Respondent:** 10731937 / Carol Mullan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The proposed submission shows that Guildford Borough Council has not taken into account the considerable objections raised to the 2016 plan and has in face increased its proposals ignoring impact on the infrastructure - roads, schools, medical facilities, and the effects of traffic and pollution to the area and its residents and further destruction of the Green Belt which is so vital for the public physical and mental health and cannot be undone.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object removing Send Business Park from the Green Belt (4.3.15).

Send Business Park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for its insetting (removal) from the Green Belt, and indeed GBC have not even attempted one. Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.

The road infrastructure to Send Business Park is totally inadequate for an increase in traffic - and any upgrade to them would spoil the rural nature of the area.

1. I object to all proposals to build on the Green Belt at Send and elsewhere because it is just that, GREEN BELT.

5. I object to what seems to be the abject failure of GBC to consider developing brownfield sites such as Slyfield.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
• I object to the proposed removal of Green Belt protection from all or any of the villages to the north east of Guildford as it could result in continuous development from Guildford to Without the Green Belt protection for Send there could also be continuous sprawl northwards from Guildford to Woking, making the whole area a vast suburban conurbation and destroying the present semi-rural character. It is beyond comprehension that elected representatives on a Conservative led council can recommend wholesale destruction of what is most attractive about this part of Surrey. One can only wonder if the lure of development money is at the root of this rather than duty to local residents. There are absolutely no exceptional circumstances requiring these villages and sites to be removed from the Green Belt.

• I object to the way the wholesale removal of the above Green Belt protection has been sneaked into the revised plan where there was no intimation of this in the previous plan, especially when there had been such vociferous objection to the earlier plan. There are no special circumstances requiring this. It suggests underhand jiggery-pokery.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5034  Respondent: 10733089 / Chris Barber  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

In particular

• I object to Send being removed from the Green Belt as I believe that this will force the Council to approve future developments on green belt land not included as identified sites in the current local draft plan

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3668  Respondent: 10733665 / David Elvey  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the removal of Send and surrounding area from the Green Belt as they provide a green buffer between Guildford and Woking.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13963  Respondent: 10733825 / Karen Thornton  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to Send being removed from the Green Belt. Mainly because Green belt land was always meant to be permanent, and there is no special circumstance that could ever justify taking it away. The Government gave a promise to protect the greenbelt...Taking the green belt status away goes completely against that. Eventually there will be nothing left as developers will move in with nothing to stop them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/561  Respondent: 10733921 / Pamela Maynard  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the proposal that Send Business Park is now taken out of the Green Belt, altogether as the area in which it is situated is true Green Belt with much cherished countryside adjacent to the River Wey Navigation. Again the traffic levels along Tannery Lane are bad enough without adding to the problem. We cannot and must not lose any more of our Green Belt to developers who do not have the best interests of the local population.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6090  Respondent: 10734241 / A. Cude  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

This is designated existing green belt land. It is supposed to keep rural areas 'green'. But clearly 'Green belt' is a meaningless term when it suits the government to de-classify it to steamroller all over it regardless.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5529  Respondent: 10734497 / Pat Spall  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am very disappointed that there are plans it remove Send and Ripley from the Green Belt. It would appear that the whole area will be over run by both Guildford and Woking.

It would seem there are many more suitable areas for such a large scale development than Send and Ripley.

The around traffic is a great problem in this area. It would appear that not sufficient thought has been given to the amount of heavy traffic necessary if the proposed developments take place and also the increased amount of cars from houses built. The whole area will become grid locked.
I really hope that some revised plan will be sought of Send and Ripley will once again be considered Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/14781  
**Respondent:** 10735777 / S. May  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/7539  
**Respondent:** 10736545 / Patricia Midson  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Send village being removed from green belt which was intended to be permanent.

Local councilors and government gave a clear promise to protect the Green Belt are we to lose our trust in GBC councilors.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/3491  
**Respondent:** 10742753 / Debbie Leane  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I am writing to notify you of my strong objection to the current local plan for Send village.

In particular ...

I object to Send village being removed from the Green Belt. Green Belt status is supposed to be permanent and there is simply no justification for ignoring such an important stipulation. In the last election both our local councillors and the government promised to preserve the Green Belt, and this goes against that promise. Preservation of this area is extremely important for ensuring that Woking and Guildford do not become one large conurbation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
To inset in the overbearing manner which is proposed for Send village, particularly in the Send Hill (A44)/ Bush Lane area, would open the door to inappropriate developments in the future and contravene the NPPF as above and indeed the Department for Communities and Local Government Policy E 16: Traveller sites in Green Belt:

- Inappropriate development is harmful to the Green Belt and should not be approved, except in very special Traveller sites (temporary or permanent) in the Green Belt are inappropriate development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the proposed removal from Green Belt (insetting) of Send Business Park. While some modernisation may be acceptable to improve the vista, any expansion of this site is inappropriate due to the single track nature of Tannery Lane which is already under threat from Policy A42 Clockbarn Nursery. While I comment on this amendment as requested, it does form part of a much bigger picture for Send in that para 4.3.13 includes Ripley, Send, Send Marsh and Burnt Common as inset in contravention of NPPF sect 9.80 and ignoring multiple previous consultation responses. My previous comments from the 2016 consultation still apply.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to Send Village being removed from the Green Belt as it provides a buffer that stops Woking and Guildford merging into one over-populated urban conurbation. Local councillors and central government should not renege on their election promises to protect the Green belt from being destroyed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to Policy P2 where Send Village would be removed from the Green Belt. The Green Belt is intended to be a permanent area of protection against development, it provides protection for the wildlife and countryside and provides an essential buffer stopping Woking and Guildford becoming one conurbation. Local government gave an election
promise to protect the Green Belt and this reneges on it. Once the land is given over to development it will have a negative impact on the area through traffic congestion, pollution and will irrevocably damage the environment.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/13078  **Respondent:** 10756033 / John Herbert  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I accept that to prosper all communities must continue to improve their circumstances and to grow at a rate that all aspects of the community, and in particular its quality of life, can develop in a balanced way. However, the rate of growth proposed far exceeds previous experience, and that of the 2014 draft plan, and from this forecast of demand all the other supply-side problems, that are so exercising the community, arise.

I would ask the review participants and inspector to:

1) Challenge the forecast population growth and housing numbers on which the plan is based namely:
   a. 13,860 new homes; an average 693/year for the next 20 years.
   This inevitably leads to extensive building on green belt; something, as I understand it, the NPPF seeks to restrict.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/13086  **Respondent:** 10756033 / John Herbert  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object to the fact that the housing need has not been substantiated. The model has not been scrutinized and some fundamental assumptions appear flawed.

Thoroughly test whether all brown field sites have been utilized to their full potential. Ask the question; Is the community going to see brown fields developed before precious, and non-returnable green belt is destroyed? The suspicion is that there is a bias towards building on green belt as it provides better financial returns public savings and/or commercial profit) with any hidden costs borne by future generations.

There is also a view that the plan does not take proper account of existing green belt constraints. The fair minded expect the planners to prove, and the Inspector to test, that these are not the case as a successful long term plan does not turn on either price or speed; but what is best for the future community; which the authors of the plan, at least, are meant to serve.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
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<tr>
<th>Comment ID: PSLPP16/6932</th>
<th>Respondent: 10756449 / Richard and Valerie Overton</th>
<th>Agent:</th>
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We object to the non-protecting of the Green Belt (Policy P2)

We object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

The Plan should develop the existing brownfield site at Burnt Common rather than developing Garlick’s Arch (A43).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/6160</th>
<th>Respondent: 10756545 / Cornelius Griffin</th>
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</table>

2/ I object to the degrading of the Greenbelt to a point when it’s very function is nullified.

3/ I object to the insetting / removing of villages from the Greenbelt. This seems to suggest that buildings and communities are not part of a Rural England.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/592</th>
<th>Respondent: 10756961 / Carol Marsh</th>
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I object to any and all erosion of the green belt

I object to any removal of villages from the green belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/595</th>
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<td>Comment ID: PSLPP16/15683</td>
<td>Respondent: 10757185 / Liz George</td>
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<th>Comment ID: PSLPP16/4971</th>
<th>Respondent: 10758593 / Richard &amp; Delia Baker</th>
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<th>Comment ID: PSLPP16/8623</th>
<th>Respondent: 10764385 / E.E Whearley</th>
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I object to erosion of the Green Belt. The erosion of special spaces in and around our villages are essential for wildlife and for these people who cannot travel far ahead to appreciate space and freedom.

2. I object to villages loving this insetting removed from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<th>Comment ID:</th>
<th>PSLPP16/12194</th>
<th>Respondent:</th>
<th>10765249 / Andy &amp; Sonja Freebody</th>
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I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.
I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed *outside* the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/11749</th>
<th>Respondent: 10768417 / James Ward</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
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</tr>
</tbody>
</table>

2. I object to not protecting the Green Belt (Policy P2).

Removing Ripley, Send and Clandon from the Green Belt is unacceptable.

These are villages that have always been surrounded by agricultural land that gives them their character. Whilst increasing population requires further housing development, large scale plans such as Wisley airfield and Garlick's Arch are inappropriate in such areas and removing these villages from the Green Belt is just an "underhand way."
to allow such developments and more in the future.

What changes (2016) / further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12583  
Respondent: 10769121 / Ali Elson  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY P2

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of “About Guildford” (published by the Council) on page 5 states that “... the Plan rejects any schemes that would have a detrimental impact on the Green Belt.” This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.
I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17639  Respondent: 10771105 / Effingham Residents Co Ltd (Andrew Bedford)  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ) is Sound? ( ) is Legally Compliant? ( )

We have had an opportunity of reviewing the Council’s proposals in respect of the draft local plan (Strategy on Sites 2016) our main comments relate to the impact of the local plan insofar as it relates to the village of Effingham. Accordingly our comments are with reference to:

1. Policy P2: insofar as it relates to Effingham/Green Belt; and
2. The extent of the Inset boundary of Effingham proposed in the draft local plan (Page 338).
3. Policy P2 Green Belt (page 49)

We are concerned with the concept of “limited infilling” and having regard to the proposed designation of Effingham within the local plan as an inset village. We consider that it is important that the inset boundary truly reflects as a matter
of fact on the ground, the extent of the relevant village. In our view, the inset boundary insofar as it relates to Effingham, should consider incorporating within that inset boundary all land which is on the ground, within the village and to exclude from the inset boundary any lands which are plainly currently outside the existing village boundary or indeed do not comprise “infilling” in the context of the NPPF, within the current confines of the village boundary.

We are aware of the five essential characteristics of Green Belt which are advocated by the NPPF.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/11  **Respondent:** 10772865 / Peter Chandler  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I am writing in response to the proposals of the Local Plan and in particular the amount and distribution of new housing proposed which is grossly excessive.

Whilst I fully appreciate new housing is required I believe there is sufficient brown field sites both in and around Guildford which should be utilised first and foremost and the idea of removing Green Belt from our borough, and indeed county, is one I am strongly opposed too.

This Green Belt land has said status for good reasons and we must protect and preserve it for ourselves and future generations. There is also an abundance of wildlife and much of the Green Belt is very close to Areas of Outstanding Natural Beauty which will be diminished should the Green Belt be eroded. The Green Belt land is part of what makes our Borough, and indeed our County, great. Once it is gone, it is gone.

In closing I request that the size of the proposed developments are significantly reduced to more sustainable figures and that brownfield sites are given preference over the Green Belt and green field sites.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/12  **Respondent:** 10772865 / Peter Chandler  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

Having reviewed the proposals for additional housing in Normandy specifically I feel this is grossly excessive and will serve to dissolve the character of the village. I note two small developments in the area (on Westwood Lane and Beech Lane) which are in keeping due to the discreet nature of their size. Additional smaller pockets of development I have little objection too, as long as they are in keeping with the surroundings and are not excessive, as mentioned above some housing is required and each Borough has a duty to provide some. Although not on the scale proposed and not at the expense of our precious Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/17010  **Respondent:** 10773153 / Miles Palmer  **Agent:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

The whole point of “Green Belt” is to provide a buffer from the continual pressure of urbanisation. We must protect these areas for the future, they were created for a reason and that principle is need now more than ever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/201  Respondent: 10773377 / Margaret & Morten Frisch  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. The greenbelt should not be built on. All plans to build on the greenbelt should be taken out of the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1057  Respondent: 10773409 / Anne Monk  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

A further reason as to why I object is due to the destruction of green belt land. Even if it is in your plans to assign new green belt land, I am sure that in the future this land will also be built on, therefore, it is vitally important to protect the green belt land we have at the moment. I object to the land at Garlick's Arch having 400 houses built on it as it is Green Belt permanently protected by the NPPF which prevents the merging of settlements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1610  Respondent: 10773409 / Anne Monk  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Fourthly, I object to Policy 2 of the proposal to inset Send Business Park from the greenbelt because it there is limited vehicular access and development of this location detracts from the openness of the Greenbelt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13594  Respondent: 10773441 / Barry Marshall  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

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I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It
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Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems
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To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the
Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I
cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could
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This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of
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GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support
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Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common,
with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the removal of land surrounding Send Village from the green belt, many of the areas proposed in the local plan are particularly vulnerable areas of high quality amenity land, in particular the land to the right of Cartbridge by the River Wey Navigation up to the new boundary fence with Vision Engineering, downstream from Cartbridge in Send. This land is exceptionally important to the setting and appearance of the river Wey and the riverside walkway at this point. It must not be placed at risk of development. As soon as a person descends from the road to the towpath it is quiet, scenic and enshrouded by the woods on the bend on the river. – a huge asset to Send tourism and users of the towpath and river. The woodland in this small area of the southern bank (Send road side) is the largest surviving tree covered area in Send and it sustains a remarkable amount of wildlife, including protected species such as bats, newts and higher order mammals such as deer. This area has an outlook from this site onto open countryside including the Wey corridor and Papercourt SSSI.

Significant change in the natural character of the area would occur if any development were to occur. Development along the river Wey definitely contradict NPPF 17, “take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it;” The planning authority also has a duty to consider the environmental impact of this development (NPPF para 7).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I also object the proposal to inset Send Business Park from the Green Belt because of the increased traffic this will cause and the removal of the openness of the River Wey corridor which is exceptional at this part of the river valley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

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I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

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In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.
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GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/632  Respondent: 10774881 / Kate Cheyne  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  
I object to all erosion of the Green Belt  
I object to any “in setting” of villages from the Green Belt  
What changes (2016)/further amendments (2017) do you suggest should be made to the document?  
Attached documents:

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Comment ID: PSLPP16/635  Respondent: 10774881 / Kate Cheyne  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  
Specific objections to Policy P2: Proposed Removal of Send from the Green Belt  
Send provides a buffer between Woking and Guildford. This is sensitive land on the banks of the Wey River, and I cannot see how it can be permitted.  
What changes (2016)/further amendments (2017) do you suggest should be made to the document?  
Attached documents:

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Comment ID: PSLPP16/5312  Respondent: 10775137 / Wendy Lodge  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  
Surely you must be aware that there is enough brown field land in Guildford to build half of he required 800 new homes. I,therefore,strongly object to Guildford Borough Council planning to take the villages of Send and Ripley out of the Green Belt.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5314  Respondent: 10775137 / Wendy Lodge  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

With regards to Policy P2. I object in the strongest terms to any suggestion that Send and Ripley are to be removed from the Green Belt. This essential protection stops uncontrolled development filling in the green spaces between settlements. The whole nature of Guildford and its surroundings is a country town surrounded by villages and green spaces for residents and visitors to enjoy. It has been proved that people require green areas for their physical and emotional well-being, with large cities, including London, retaining their large green spaces.

However, you believe it is reasonable to reduce ours. The actions of the Guildford Borough Council have already shown how important it is for Send to remain under the protection afforded by Green Belt legislation. The Wey Navigation is used by thousands of people in boats, on cycles and walking the countryside in this area, which would be detrimentally effected by further building on the land along the canal. There would be significant pressure to do so if protection was removed and, as shown by the approval of plans for a new marina in Tannery Lane, Guildford Borough Council cannot be trusted to follow the wishes of the residents of Send Village. Land in surrounding boroughs is also facing threats of removal from Green Belt protection. There must be a whole landscape approach to development. Current proposals are threatening to cover this part of Surrey with concrete. Guildford Borough Council have made repeated promises to protect the Green Belt but have failed to deliver on them. Taking Send Village out of the Green Belt would put huge pressure on the green spaces within the village for unwanted and unnecessary development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/802  Respondent: 10775137 / Wendy Lodge  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the proposal Policy 2 at paragraph 4.3.15, to inset Send Business Park from the Green Belt because:

It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation

There is highly restricted vehicular access along Tannery Lane in both directions

Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate

I object to the insetting of other land within Send. Already developers are looking at building on the School playing fields which, it is proposed, will be removed from green belt protection. They have even asked me my thoughts on selling them part of my garden! This is in addition to all the other proposed building and extra houses recently, currently under review and proposed on residential plots. This is all too much for the small village of Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/7241  Respondent: 10775169 / Caroline Grafton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I oppose unjustified Green Belt development.

It is irresponsible to squander every last resort greenfield site in a single Plan, robbing future generations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/608  Respondent: 10776033 / Prue Robinson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Green Belt, Policy 2 at paragraph 4.3.15
I object most strongly to the changes made to Green Belt, Policy 2 at paragraph 4.3.15
These are my reasons:
I note that Send Business Park is now taken out of the Green Belt altogether. It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation. There is highly restricted vehicular access along Tannery Lane in both directions and further expansion and/or development here detracts from the openness of the Green Belt. It is inappropriate. To me your proposals to build on Green Belt in the Send area are completely unacceptable. In fact it appears that GBC have not only not listened to the tens of thousands of locals' objections and points of view but are set on making life worse for us all! To accommodate all that you would like to do there is certainly an inadequate infrastructure i.e. schools, medical facilities (as required by law) and our already crowded roads which will not be able to cope. And this is aside from the planned decimation of ancient woodland and beautiful countryside enjoyed by so many.
To sum up, I find the changes in your proposals completely unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1782  Respondent: 10776225 / Roger Main  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy P2 – Green Belt

I OBJECT. The (Metropolitan) Green Belt is not for GBC or any others to play with. There is no justification for insetting East or West Horsley. They are currently washed over by the Green Belt and their character adds to the character and ambience of the Green Belt as required under NPPF guidelines. There is no justification for going even further and then taking additional land adjacent to the villages out of the Green Belt, to allow for more housing development.

The argument that adding “Green Belt” in Tongham and Ash (on the other side of Guildford, away from London) makes up for the loss of other villages is specious. The Metropolitan Green Belt is intended to prevent urban sprawl from
London and allow for green space around it – Tongham and Ash are outside the Green Belt because they would make no difference to it. It may just be coincidence that these wards were represented by present and past leaders of the council.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Green belts, like the area at the back of Glaziers Lane, and Wanborough station, were designated to prevent urban sprawl. The DCLG suggest that once established green belt boundaries should be altered only in exceptional cases. The outcome of the proposals in this Local Plan will result in the amalgamation of Flexford with parts of Normandy with no green spaces in between. Is this not an exceptional case? Exceptional circumstances have to be demonstrated and it has to be approved by the inspectorate. There appears to be no legal evidence to back up the statement made that a school built on the green belt provides enough 'exceptional circumstance' to remove that land from the green belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/4044</th>
<th>Respondent: 10781729 / Sylvia Williams</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<tr>
<td>Removing East and West Horsley from the Green Belt will completely change the character of the villages I know and love and I object most strongly to this proposal. I firmly believe the Green Belt needs to be preserved especially for future generations.</td>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<tr>
<td>I do strongly object to removing East and West Horsley from the Green Belt as this will completely change the character of the villages. I believe the Green Belt needs to be preserved especially for future generations so they have a green and pleasant environment to live in.</td>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<table>
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<th>Comment ID: PSLPP16/1409</th>
<th>Respondent: 10782625 / Heather Alexander</th>
<th>Agent:</th>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<tr>
<td>Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings</td>
<td>I object to the draft Local Plan for the following key reasons:</td>
<td></td>
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</table>
1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13688  Respondent: 10782625 / Heather Alexander  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY P2 (GREEN BELT):

- No declaration of support for protecting the Guildford Green Belt, contrary to NPPF and government statements.
- No evaluation of value of local Green Belt as a public and private asset: it’s just treated as potential building land with a few inconvenient restrictions.
- Impact of Green Belt development on local agriculture ignored.
- Impact on rural leisure and tourism ignored.
- Impact on flood control ignored.
- Impact on carbon sink and knock-on effects for air pollution and climate change ignored.
- Impact on biodiversity ignored.
- Impact on natural heritage ignored.
- Impact on water catchment ignored.
- Impact on room for public space amenities (parks, cemeteries, waste facilities etc) ignored.
- Impact on rural business (e.g. mineral mining, film making) ignored.
- Impact on natural landmarks and views ignored.
- Harm to public health and well being (physical, psychological) ignored.
- Allows excessive levels of development in breach of views expressed in last consultation and Conservative Party manifesto commitments at the last local elections.
- Has allowed ruling Councillors to argue that there is an acceptable percentage of Green Belt that should be sacrificed to development, when no such rule exists in the NPPF.
- Ignores alternative approaches, such as fair burden-sharing under which settlements would undertake to accommodate new development in proportion to their size.
- Disproportionate amount of development (most of it, in fact) to be in Green Belt. Too few new homes in urban areas where most people (especially the young and less privileged) want to live. This will act against much needed urban regeneration.
- “Insetting” of most villages disproportionate and unjustified in terms of their contribution under the NPPF to the purposes of the Green Belt. Based on flawed Green Belt and Countryside Study. Idea that most Guildford villages do not contribute to “openness” is subjective.
- Major settlement extensions allow indiscriminate housebuilding, as irregularly shaped villages are squared off to enclose green fields.
- Overall harm to Guildford Green Belt unjustified by any objective development need post-Brexit.
- Ignores most of NPPF 17 stipulations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4335  Respondent: 10782689 / Murray Dudgeon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to building on the Green Belt. The very nature of Green Belt is to protect the openness and permanence of these areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4336  Respondent: 10782689 / Murray Dudgeon  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- Green Belt sites meet the requirements for the Green Belt.

I object to the planned building on Gosden Farm, on Green Belt designated to protect West Clandon from being absorbed into an urban mass.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15281  Respondent: 10782689 / Murray Dudgeon  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should
be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<td>Finally, I'm objecting on the grounds that while there are brownfield sites available, building on greenfield spaces should not be permitted as it merely erodes the countryside that we are so fortunate to have on our doorstep.</td>
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| Comment ID: pslp171/1745 Respondent: 10783425 / Caron Hill Agent: |
| Document: | Proposed Submission Local Plan: strategy and sites 2017 / Policy P2 |
| **Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )** |
| I object to the proposal to take Send Business Park out of the Green Belt because it is located in an area of beauty next to the Wey Navigation. Developing in this area feels like an insidious move to completely remove Send from the Green Belt, while there are industrial spaces in Guildford this should not even be considered. This would further amplify my point re: traffic above in Tannery Lane. |
| **What changes (2016)/further amendments (2017) do you suggest should be made to the document?** |
| Attached documents: |

| Comment ID: PSLPP16/749 Respondent: 10783489 / Rick Klink Agent: |
| Document: | Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 |
| **Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )** |
| GUILDFORD PROPOSED LOCAL PLAN 6/6/2016 |
| FIELDS BEHIND SHALFORD VILLAGE HALL |
| As a resident of Shalford and a member of Shalford LTC I wish to make known my objections to the current version of the local plan which removes the fields behind the Village Hall and Tennis Club from the Green Belt and puts them in the Shalford settlement boundary. |
| Although these fields have been classified as “open spaces” there is no explanation or confirmation to say that this would give them the same degree of protection as the Green Belt from housing development. |
| Any Construction on these fields which are 25ft above the village hall would tower over the tennis courts and bowling green and totally destroy the Green lung of the village. |
| The considerable traffic from a development would have to exit on Chinthurst lane not only adding to the traffic chaos and pollution but increasing the potential for an accident. |
| By implementing a small adjustment back to the 2003 boundary GBC could protect these fields and ensure they remain open spaces. |
| **What changes (2016)/further amendments (2017) do you suggest should be made to the document?** |
| Attached documents: |
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

In GBC's paper About Guildford you have a feature concerning the Local Plan in which you pose the question: is our Green Belt under threat? Your answer includes the sentence:

*Only sites that propose sustainable solutions have been included in the Plan, and the Plan would reject any schemes that would have a detrimental effect on the green belt.*

How can this fit in with your aim to strip 15 villages, including Send and Ripley where I live, of their green belt status? Such an action would allow greedy and unscrupulous developers, (already gathering ready to pounce) carte blanche with our precious countryside.

The duplicity of your supposed reassurance on the matter of the Green Belt and the cynical and underhand manner in which you are treating your citizens concerning other aspects of the Plan is disgraceful. I therefore protest in the strongest terms against the Local Plan for the following reasons:

**I object** to the removal of 15 villages, including Ripley and Send, from the green belt. This will lead to wholesale, and often inappropriate developments.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Green Belt Policy 2 paragraph 4.3.15
Send Business Park to be taken out of Green Belt
I object to the proposal to inset Send Business Park from Green Belt, because:

It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the Wey Navigation. There is highly restricted vehicular access along Tannery lane. Further expansion or development at this location detracts from the Green Belt and is inappropriate.

I suspect that none of the members of the Planning Committee live anywhere near Send or Ripley and that their own wards are not being subjected to this wholly unnecessary Local Plan of destruction of both our village environment and the precious Green Belt.

As already stated, I and the other 10,000 or so inhabitants of this area find the Planning Committee actions totally undemocratic and unsustainable.

We can only hope that MAYBE this time round our objections will be heard and answered sympathetically. Sadly, given Guildford Borough Council's actions so far, I am sceptical of this happening.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

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I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

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GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2328  Respondent: 10785889 / Guildford Diocese Education (D Hallam)  Agent: AMEC E&I UK Ltd (Caroline Searle)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Diocese of Guildford supports draft Local Plan Policy P2 Green Belts in relation to land at Send

Where appropriate, insetting complies with Section 9 of the National Planning Policy Framework (NPPF), particularly para 85 where Green Belt boundaries are defensible and ‘use physical features that are readily recognisable and permanent’.

At Send, the new Green Belt boundary that forms the southern edge of the village consists of a mature, dense belt of trees that gives a strong, defensible natural edge to the village. The Diocese of Guildford supports this new boundary and welcomes the removal of the land and buildings of Send First School and St Bede’s Junior School (and the sports pitches between the 2 schools) from the Green Belt. The land makes little contribution to the five established purposes of the green belt and is not clearly visible to those outwith the school facilities and therefore has limited visual amenity benefit failing to contribute to the ‘openness’ of the Green Belt as required by para 79 of the NPFF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11133  Respondent: 10787073 / Clare Arnold  Agent: 
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

Policy P2 - Green Belt - I object to the plans to remove areas of the Guildford Borough from the Green Belt, maintenance of the Green Belt is essential to maintain the character of the Borough and the proposal does not warrant 'exceptional circumstances'

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/4414  **Respondent:** 10788001 / William Williams  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

I object to the Draft Local Plan.

I object to villages of Ripley, Send, West Clandon, and the Horsleys being taken out of the green belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/8930  **Respondent:** 10789601 / Jennifer Hodgetts  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

I object strongly to Send being removed from the green belt status. The village acts as a buffer between Woking and Guildford and prevents urban sprawl

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp171/1134  **Respondent:** 10789985 / TREG Consulting (Waleed Al Qadoumi)  **Agent:** ECA (Martha Covell)

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( No ), **is Legally Compliant?** ( )

The updated proposals map for Effingham (Page 380 AND 381 of Appendix F) shows how the village boundary will be inset from the Green Belt and the relationship of this boundary to the Effingham Village conservation area.

We object to the amended Green Belt Boundary to Effingham Village on the grounds that it will lead to the merging of Effingham and Bookham and fails to give full consideration to the requirements of the NPPF in terms of the need to make full use of natural and man made features to create defensible green belt boundaries. The green belt boundary should be
amended and the TREG site on Effingham Common Road to the north of the village should be taken out of the Green Belt. The Ancient Woodlands to the North and West should form defensible boundaries to the Green Belt instead of rear gardens to dwellings.

Below is a more detailed analysis of why the proposed village boundary to Effingham is unsound contrary to paragraph 80 and 85 of the NPPF. Attached is our Green Belt Assessment of Effingham Village which examines the character of the Green Belt here in far more detail and should be taken into account in the consideration of amending the Green Belt boundaries here:

Land north east of Effingham Village

- The area to the north-east of Effingham Village currently serves a number of green belt purposes in terms of preventing urban sprawl and keeping land permanently open in accordance with Section 9 of the NPPF. It is unsound to allocate land currently within the Green Belt that serves all of these purposes.
- Land to the North East of Effingham Village currently serves a number of these purposes, more so than other parcels of land adjoining the village, which should be allocated instead. Details are set out below:
  - **Purpose 1**: ‘To check the unrestricted sprawl of large built-up areas’: The parcel of land north–east of Effingham currently restricts the built up area of Effingham and Great Bookham and plays a vital role.
  - **Purpose 2**: ‘To prevent neighbouring towns merging into one another’: This is the prime purpose of this piece of green belt as it prevents the villages of Bookham and Effingham from merging into each other. If this site was built upon then there would be a continuous development from one village to the other and the gateways between the two villages would completely disappear.
  - **Purpose 3**: ‘To assist in safeguarding the countryside from encroachment’. The allocation of this site for development would lead to significant development encroaching into the Countryside. Unlike our client’s site opposite on Effingham Common Road, there are no natural or man made barriers to the north to prevent the Countryside form further encroachment in the future. This allocation is therefore contrary to advice contained within Paragraph 85 of the NPPF which states that local authorities, should define boundaries which are clear and use physical features.
  - **Purpose 4**: ‘To preserve the setting and special character of historic towns’; Effingham is an historic village and conservation area. However this site is not immediately adjacent to the historic core and development is unlikely to have a significant affect on the character of the village. Notwithstanding this, the sites have an open character and forms a gateway into the village which is currently green fields leading into an historic core will be severely eroded as a result of this allocation.
  - **Purpose 5**: ‘To assist in urban regeneration, by encouraging the recycling of derelict and other urban land’; This is not relevant here.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

The green belt boundary should be amended and the TREG site on Effingham Common Road to the north of the village should be taken out of the Green Belt. The Ancient Woodlands to the North and West should form defensible boundaries to the Green Belt instead of rear gardens to dwellings.

**Attached documents:**

- 131122 EFFGreenBelt.pdf (1.0 MB)

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Comment ID: PSLPP16/3557  Respondent: 10793281 / Paul Woodington  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the removal of 15 villages, including Ripley and Send, from the green belt. This will lead to wholesale, and often inappropriate developments.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
Green Belt, Policy 2 at Paragraph 4.3.15

I strongly object to the proposal to inset Send Business Park from the Green Belt because:

- Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate.
- The vehicular access along Tannery Lane (in both directions) is extremely restricted.
- It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation.

I sincerely hope that my objections will be sympathetically considered and that common sense prevails. Once the Green Belt has been lost and our beautiful villages spoilt there is no turning back.

The infrastructure of our villages is not able to support a substantial increase in population and traffic. The houses will not be affordable because in this area nothing is affordable. This can be seen by the 5 bedroom executive homes that are built on any bit of land that does become available. The only people who will benefit from these plans are those who will be involved in the building, thereby increasing their bank balances.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final Plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of “About Guildford” (published by the Council) on page 5 states that “… the Plan rejects any schemes that would have a detrimental impact on the Green Belt.” This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the Plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.
Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/854  Respondent: 10798049 / Steve & Maureen Knight  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Object – I do not agree with insetting of villages or the widespread abuse of the green belt. The villages should stay in the green belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7258  Respondent: 10798369 / Gail Hollis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Send, Ripley and Clandon being removed from the Green Belt. The Green Belt was intended to be permanent, as required by the National Planning Policy Framework and their are no special circumstances to justify abandoning it. The Green Belt around the three villages provides an essential buffer stopping Guildford and Woking becoming one huge suburb. Local councillors and central government gave a clear election promise to protect the Green Belt and this reneges on it. Developers will be quick to take advantage and there will be nothing to stop them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Send, Ripley and Clandon being removed from the Green Belt. The Green Belt was intended to be permanent, as required by the National Planning Policy Framework and there are no special circumstances to justify abandoning it. The Green Belt around the three villages provides an essential buffer stopping Guildford and Woking becoming one huge suburb. Local councillors and central government gave a clear election promise to protect the Green Belt and this reneges on it. Developers will be quick to take advantage and there will be nothing to stop them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1065   Respondent: 10798369 / Gail Hollis   Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the proposal to inset Send Business Park from the Green Belt because:

1. a) There is highly restricted vehicular access along Tannery Lane in both directions. The lane is very busy at peak times and will become worse

1. b) Further expansion or development at this location detracts from the openness of the Green Belt and is totally inappropriate

1. c) It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation canal and the Wey.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/320   Respondent: 10799169 / Neal Basson   Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Therefore, I object to Policy P2 and the other policies as referenced below in the strongest possible terms. I have outlined below why this is the case based on my specific local knowledge of the area where I live. I have also included my general objections to various policies within the plan.

Policy P2: Green Belt Status

There is no justification or believable rationale that the land in question can be removed from the green belt. This view is the opinion of the local residents, which will be evidenced by the number of letters you have already received on this subject, plus a petition and strength of local opinion against the proposed development. The residents are overwhelmingly disappointed with those they have elected to represent them, and are horrified that they have agreed to adopt such policy.

National policy on the Green Belt, as set out in the National Policy Planning Framework, makes clear that most development in the Green Belt is inappropriate and should only be approved in very special circumstances. Planning
guidance also states that unmet housing need is unlikely to outweigh the harm to the Green Belt to constitute the very special circumstances justifying inappropriate development within the Green Belt.

- Amongst other relevant factors, the National Framework states:
  - The core planning principles that underpin plan-making include both protecting the Green Belts and recognising the intrinsic character and beauty of the countryside.
  - Once established, Green Belt boundaries should only be altered in exceptional circumstances.
  - The purposes of the Green Belt include checking the unrestricted sprawl of large built-up areas, preventing neighbouring towns merging into one another, and assisting in safeguarding the countryside from encroachment.

Therefore, the Council’s plan is at completely at odds with the Government’s national policy, and alternative, more suitable and logical action should be taken – e.g. the National Framework does allow for redevelopment of previously developed sites (brownfield land) – although again, under certain guidelines.

- The large number of houses (385 homes on Green Belt land in West Horsley alone) identified for potential development in West Horsley would be totally out of character with the existing make-up and layout of the village.
- The village settlement is comprised of low density housing with a considerable mix of ages and housing styles, including a good number of historic buildings
- The need for so many houses in Guildford borough, never mind West Horsley, has not been proved in the Consultation documents.
- Through a 2014 housing survey, West Horsley Parish Council has confirmed a limited need for 20 affordable homes for local people who want to remain in the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/18369  **Respondent:** 10799169 / Neal Basson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I write with regard to the above. There are proposals to put 70% of the new housing on either Green Belt or on countryside beyond the Green Belt - i.e. most of the new homes are not being put on urban brownfield sites. To do this, will require the insetting of 14 villages from the Green Belt, and the proposal that infilling is acceptable within a further 12 villages within the Green Belt. I am also concerned that “infilling” is also proposed outside the settlement boundaries of 11 further villages. Essentially, all the villages within the Green Belt are now vulnerable to extensive further development.

Green Belt is supposed to be protected as a matter of national and local policy, but this policy seeks to justify development in a supposedly protected area, in breach of local manifesto commitments and contrary to previous responses to public consultation.

Taking my local villages of East and West Horsley as examples, the plan indicates 533 new houses. This will completely change the character of the area forever, which is unjustified and unnecessary – like the vast majority of the overall plan.

Therefore, I object to Policy P2 and the other policies as referenced below in the strongest possible terms.

I have outlined below why this is the case based on my specific local knowledge of the area where I live. I have also included my general objections to various policies within the plan.

There is no justification or believable rationale that the land in question can be removed from the green belt. This view is the opinion of the local residents, which will be evidenced by the number of letters you have already received on this subject, plus a petition and strength of local opinion against the proposed development. The residents are overwhelmingly disappointed with those they have elected to represent them, and are horrified that they have agreed to adopt such policy.
National policy on the Green Belt, as set out in the National Policy Planning Framework, makes clear that most development in the Green Belt is inappropriate and should only be approved in very special circumstances. Planning guidance also states that unmet housing need is unlikely to outweigh the harm to the Green Belt to constitute the very special circumstances justifying inappropriate development within the Green Belt.

Amongst other relevant factors, the National Framework states:

- The core planning principles that underpin plan-making include both protecting the Green Belts and recognising the intrinsic character and beauty of the countryside.
- Once established, Green Belt boundaries should only be altered in exceptional circumstances.
- The purposes of the Green Belt include checking the unrestricted sprawl of large built-up areas, preventing neighbouring towns merging into one another, and assisting in safeguarding the countryside from encroachment.

Therefore, the Council’s plan is at completely at odds with the Government’s national policy, and alternative, more suitable and logical action should be taken – e.g. the National Framework does allow for redevelopment of previously developed sites (brownfield land) – although again, under certain guidelines.

- The large number of houses (385 homes on Green Belt land in West Horsley alone) identified for potential development in West Horsley would be totally out of character with the existing make-up and layout of the village.
- The village settlement is comprised of low density housing with a considerable mix of ages and housing styles, including a good number of historic buildings.
- The need for so many houses in Guildford borough, never mind West Horsley, has not been proved in the Consultation documents.
- Through a 2014 housing survey, West Horsley Parish Council has confirmed a limited need for 20 affordable homes for local people who want to remain in the village.

Village facilities

The infrastructure of the West Horsley, as well as East Horsley cannot support a potential effective doubling of the households and residents.

The villages are extremely rural in character. East Horsley has one public house, a church, a hotel, very few shops, and not one state school. The two boys only private schools already produce significant traffic problems at each end of the school day on Ockham Road North and the A246.

Secondary school places are limited at the Howard of Effingham School and other secondary schools are a greater travelling distance from the village.

West Horsley alone includes no less than 41 listed buildings, some dating back to the 15th century. West Horsley has one shop, no post office and one highly over-subscribed school.

The single medical centre shared between East and West Horsley is similarly over-subscribed and residents have difficulty in getting appointments. Such a massive increase in population as proposed would stretch this service to beyond breaking point. The planned population increase for the Borough would also mean a major extension of the Royal Surrey Hospital to allow it to cope.

Parking facilities are extremely limited in the shopping areas of East and West Horsley, as well as Horsley station. The impact of such a large increase in population as proposed would overstretch these facilities. It would make it difficult if not impossible for many of the older and less mobile inhabitants to reach the shops, and most importantly the medical centre and chemist.

Roads

Traffic generation from the proposed development would be considerable, with most households having two cars, many with three.
The Street, which constitutes the only entry to West Horsley from the A246, is very narrow, and it would not be possible to widen it. This road is already often perilous, particularly when large lorries, buses and tractors pass through. To increase such traffic, which would result if the proposed developments were to proceed would be wholly irresponsible.

Transport

- West Horsley’s bus service through the village is extremely limited and only operates two/three times per day Monday to Friday.
- The bus service running from Guildford to Leatherhead travels along the A246 at the southern end of the village and is really only of use to residents living within a maximum of eight to ten minutes walk from the bus stops at the Bell and Colvill roundabout.
- Parking at Horsley station is limited and sometimes full on a weekday. There is no land to create additional parking for the increased need that the proposed expansion would bring.

Drainage /flooding

The land between Silkmore Lane and Ripley Lane is frequently subjected to such serious flooding that Ripley lane becomes absolutely impassable several times per year. This land slopes significantly towards Ripley Lane, and during periods of sustained rainfall, flooding always occurs. Severe flooding also frequently occurs on The Street, East Lane, and Long Reach, to the extent that these roads, and in particular the hill under the railway line often become impassable.

This is also the case in the road where I live – Green Lane. There is already an under-capacity of existing drainage, sewers and treatment works to cope with heavy rainfall. When heavy rain does occur, the water in the toilets in our house rises alarmingly, and the drains and sewers flood the road and our garden, requiring several visits from the water company to clean and sanitise the ground. The current infrastructure is unable to deal with the requirement.

Impact on Areas of Outstanding Natural Beauty

The impact of the proposed housing estates would be to blight the surrounding areas of outstanding natural beauty. Many of the proposed sites are so close to such areas that it would no longer be appropriate to refer to these as such, as they would become reducing areas of green countryside, surrounded by urban sprawl.

Most of the areas proposed for potential developments are contiguous with AONB and it is my understanding that statutory protection is afforded to areas contiguous with AONB.

Impact on Wildlife

The impact on wildlife in the Horsleys would be devastating. In my own garden, I have had grass snakes, hedgehogs, weasels, toads and deer and have observed red kites and woodpeckers. These species would be under threat form loss of habitat, and in some cases, predatory cats, the population of which would increase with the proposed rise in homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
of 11 further villages. Essentially, all the villages within the Green Belt are now vulnerable to extensive further development.

Green Belt is supposed to be protected as a matter of national and local policy, but this policy seeks to justify development in a supposedly protected area, in breach of local manifesto commitments and contrary to previous responses to public consultation.

Taking my local villages of East and West Horsley as examples, the plan indicates 533 new houses. This will completely change the character of the area forever, which is unjustified and unnecessary – like the vast majority of the overall plan.

Therefore, I object to Policy P2 and the other policies as referenced below in the strongest possible terms.

I have outlined below why this is the case based on my specific local knowledge of the area where I live. I have also included my general objections to various policies within the plan.

There is no justification or believable rationale that the land in question can be removed from the green belt. This view is the opinion of the local residents, which will be evidenced by the number of letters you have already received on this subject, plus a petition and strength of local opinion against the proposed development. The residents are overwhelmingly disappointed with those they have elected to represent them, and are horrified that they have agreed to adopt such policy.

National policy on the Green Belt, as set out in the National Policy Planning Framework, makes clear that most development in the Green Belt is inappropriate and should only be approved in very special circumstances. Planning guidance also states that unmet housing need is unlikely to outweigh the harm to the Green Belt to constitute the very special circumstances justifying inappropriate development within the Green Belt.

Amongst other relevant factors, the National Framework states:
- The core planning principles that underpin plan-making include both protecting the Green Belts and recognising the intrinsic character and beauty of the countryside.
- Once established, Green Belt boundaries should only be altered in exceptional circumstances.
- The purposes of the Green Belt include checking the unrestricted sprawl of large built-up areas, preventing neighbouring towns merging into one another, and assisting in safeguarding the countryside from encroachment.

Therefore, the Council’s plan is at completely at odds with the Government’s national policy, and alternative, more suitable and logical action should be taken – e.g. the National Framework does allow for redevelopment of previously developed sites (brownfield land) – although again, under certain guidelines.
- The large number of houses (385 homes on Green Belt land in West Horsley alone) identified for potential development in West Horsley would be totally out of character with the existing make-up and layout of the village.
- The village settlement is comprised of low density housing with a considerable mix of ages and housing styles, including a good number of historic buildings
- The need for so many houses in Guildford borough, never mind West Horsley, has not been proved in the Consultation documents.
- Through a 2014 housing survey, West Horsley Parish Council has confirmed a limited need for 20 affordable homes for local people who want to remain in the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We request that the objections made below are put to the Inspector appointed by the Secretary of State to review the GBC Regulation 19 draft local plan. A spokesperson (not a councillor) will be pleased to speak in respect of this issues. We request that once all objections are fully taken into consideration the draft plan is amended accordingly and re-issued. Guildford is a constrained borough by the reality of having 89% of its area zoned as permanent Green Belt and an out of date road network that is already at capacity. We are concerned that GBC have adopted an inflated OAN of 13,860 homes as a housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance. The application of constraints to housing need is a sensible and practical approach to development within the borough and is not only what GBC have done in the past in previous plans but is also what its neighbouring local planning authorities have done. The scale of the housing number proposed in this plan, inevitably increases the onus for the plan to be seen to be sound. A substantially lower number of 5,000 homes over the plan period, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole. We are concerned that GBC have failed to grasp the opportunity of following clear government policy to develop in the urban area on previously developed sites. Many of these sites are in their ownership and it would seem a practical and readily achievable alternative which is much more acceptable to local residents. In our opinion much of the proposed local plan appears out of date. Current trends in terms of property development such as the marked decline in town centre shopping centres and the need to create modal shift by developing residential uses close to transport hubs appear to have been overlooked.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/17525  **Respondent:** 10799425 / Guildford Greenbelt Group (Susan Parker)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

We object to Policy P2 green belt

This policy states, “the general extent of the Green Belt has been retained.” We do not accept this statement.

The policy wording is weak in support of the Metropolitan Green Belt even though the latter forms 89% of the borough and should be the cornerstone of all local planning policy. It is precious beyond the short-term demands of the present Government’s policy or a 15-year local plan. As noted under Policy S1 above, it is a solemn legacy to future generations – an asset and amenity that belongs as much to Londoners and the whole nation as to the people who live in it. It is an inalienable public good. Once gone it is gone forever. It is not the Council’s to give away.

Policy P2 completely fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it has been around for a long time and it needs to be permanently protected. It was actually established in a local act of parliament in Guildford under the London Home Counties (Green Belt) Act 1938 and subsequently in the 1944 Greater London Plan to contain the outward sprawl of London. The boundaries of the Green Belt through Guildford Borough were later defined in the 1987 Local Plan, forming part of a 19-24km concentric belt around London. The Green Belt is intended to check the unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and other urban land. The principles of the Green Belt designation were outlined within Planning Policy Guidance 2: Green Belts (PPG2) and are found within the National Planning Policy Framework (NPPF). The Metropolitan Green Belt is an exemplar of good planning and the envy of planners throughout the world. Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. Building on it involves high opportunity costs, including an irreversible loss of:

1. Agricultural production
2. Rural leisure and tourism amenities
3. Water catchment
4. Flood control
5. Biodiversity
6. Natural heritage
7. A carbon sink for air pollution
8. Room for public facilities such as parks and burial grounds
9. Profitable film locations (e.g. Shere)
10. Future economic potential such as mineral extraction (even fracking)
11. Natural beauty, landmarks, open space, rural views and sight lines
12. Benefits to public health and wellbeing, physical and psychological (as well expressed in the NPPF)

As a matter of law and national and local policy, these assets should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultations.

It is quite incorrect to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold. No-one argues that we should sell 1.6% of the Crown jewels in order to build houses.

We object to the “insetting” of 14 villages from the Green Belt, and at “infilling” 12 of the borough’s Green Belt villages. Weam deeply disturbed that settlement boundaries are to be hugely extended in many villages and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are “leggy” in outline, reflecting the effect of ribbon development (often along just one side of existing roads) permitted between the Wars. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines.

The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost hell bent on self-defeat. We believe this policy is based on a flawed Green Belt and Countryside Study that, according to one Conservative Councillor, was irregularly commissioned by Council officers without the authority of Councillors.

To “inset” two thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. WE cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, although they would quickly destroy them if the proposed “insetting” and boundary extensions go ahead. This policy is wildly disproportionate in terms of any foreseeable development need (especially post-Brexit) and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/105  Respondent: 10799489 / Shai Sinai  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to policy 2 at paragraph 4.3.15;

I object to the proposal to inset Send Business Park from the green belt because there is highly restricted vehicle access along Tannery Lane, which is very narrow. This is an area of outstanding countryside adjacent to the beautiful rivery wey navigation and once again this is another attack on the green belt, which is inappropriate and should be protected at all costs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/537  Respondent: 10799809 / Judy Simpson  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I have objections to the local plan and I want the Planning Inspector to be seen by the inspector.

I object to the local plan proposal to remove Send village from the green belt. It is important for the next generation to know what a village is, and what the green belt is.

I object to the local plan proposal to build so many houses in Send & Ripley area on green field sites as there are still quite a few brown field sites that could be built on.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13426  Respondent: 10800065 / David Thompson  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16710  Respondent: 10800673 / Nigel Rowland  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT TO THE IMPACT ON THE GREENBELT STATUS OF THE VILLAGES

- **I OBJECT** to GBC’s plan to remove Send and Ripley from the Greenbelt. The precious Greenbelt is not just a ‘nice to have’, but is an inalienable public good including space for rural leisure and tourism activities, flood control and benefits to public health. Once the greenbelt is built on, it will never be reinstated. The Local Plan seems to be prepared to ‘ride rough shod’ over the Greenbelt, even to the extent of losing ancient woodland at Garlick’s Arch.
- **I OBJECT** to GBC’s plans to allow ‘insetting’ the villages from the Greenbelt and infilling within village boundaries. This will erode the pockets of Greenfield sites around Send and Ripley and will result in an urban sprawl, effectively linking Woking and Guildford. I understand, and support, the appropriate use of brown field sites to build additional housing as required for the local population. However, the Local Plan appears to be taking the easy and cheaper option, of eroding Greenbelt, rather than actively searching for opportunities within urban Guildford where the infrastructure is already in place to support the resultant increase in population.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: pslp171/439</th>
<th>Respondent: 10800673 / Nigel Rowland</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Green Belt, Policy 2 at paragraph 4.3.15**

Send Business Park now taken out of the Green Belt altogether

I object to the proposal to inset Send Business Park from the Green Belt because:

- It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation
- There is highly restricted vehicular access along Tannery Lane in both directions
- Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate

Please stop and consider again, the Plans you are proposing, if followed through, can never be undone and the damage to our environment will be permanent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/2536</th>
<th>Respondent: 10803009 / M Robson</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Policy P2. Send should not be removed from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the Policy 2 at paragraph 4.3.15.

I object to the proposal to inset Send Business Park from the Green Belt because

- It is non-confirming user in an area of outstanding countryside directly next to the beautiful Wey Navigation.
- There is vehicular restriction along Tannery Lane in both directions
- Further development will impact the Green Belt and the openness of the area
- Further development will impact the character / heritage of the village
- Further development will lead to increased traffic in the area, an area that is already severely congested
- Further development will impact flora and fauna in the Green Belt
- Further development will increase noise levels in the local area

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I strongly object to the removal of The Horsley’s from the Green Belt and the extension of the boundaries of the settlement areas. The exceptional circumstances required before taking this action have not been demonstrated. The proposals seem to be aimed at increasing the land available within the settlements for future additional development. Horsley is a village by definition and we want to keep it as such and within the existing green belt. The additional houses planned increase the population of West Horsley by a staggering 35% which is far greater than any other single area in the Guildford Borough. How can this be right ?? And it is for this reason I object strongly to the proposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the removal of Ripley, Send and Clandon from the Greenbelt, and general failure to protect the Green Belt in the Plan.

I strongly object to the removal of several of our rural, historic villages from the Green Belt, including Send, Clandon and my own village of Ripley – as well as the ancient woodlands and green belt meadows at Wisley Airfield and Garlick’s Arch. Once removed from the Green Belt they will be gone forever. The villages, particularly Ripley, are ancient with a rich history, character and significance as recognised, for example, by the Ripley conservation area and Ripley regularly
appearing in the media as an archetypal English village. The Green Belt was one of the major planning triumphs of the last century, safeguarding uncontrolled development and urban sprawl. The government itself has reiterated that Green Belt should not be violated for housing needs, which is exactly the motivation for removing these villages from the Green Belt in the Plan – there is no “exceptional reason” for insetting these villages or sites other than housing targets. The net effect will be a sprawling extension of Guildford north along the A3, destroying woodlands, open spaces and the character of local villages with clear deleterious effects. The villages will be infilled with housing and merge into one destroying their identity forever. I understand that there are brownfield sites even within these villages that can be developed instead e.g. south of Burnt Common. Clearly we should be developing those and other brownfield sites in the borough instead of destroying virgin Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/13279</th>
<th>Respondent: 10803809 / David Jones</th>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<tr>
<td>1. Policy P2 – Green Belt: I object to this significant erosion of the Green Belt with the proposals for large towns being developed on Green Belt land thereby removing the openness of the Green Belt. We note in particular the huge developments proposed for the North East quadrant of the borough which will adversely affect our amenity, but also unfairly targets our tranquil rural villages because we can provide ‘dormitory’ facilities for commuters to London. These developments directly affecting our villages are the proposals for various farms and tracts in the Horsleys and Garlicks Arch at Send.</td>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/812</th>
<th>Respondent: 10804961 / M. Basson</th>
<th>Agent:</th>
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<td>I am writing concerning the local plan, as I object to the large majority of the proposals contained within it. It is unacceptable to build 70% of the new housing on either Green Belt or on countryside beyond the Green Belt, and not to build more on urban brownfield sites. It is also unacceptable to remove 14 villages from the Green Belt, and to propose that infilling is acceptable within a further 12 villages within the Green Belt. This means that huge swathes of the Green Belt are now vulnerable to extensive further development. All completely unacceptable and contrary to national and local policy. The plan shows 533 new houses in East Horsley and West Horsley. Should this go ahead, it will change irrevocably the character of the area, for the worse, which is unjustified and unnecessary. I object strongly to Policy P2 and the other policies as referenced below.</td>
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I have outlined below why this is the case based on my local knowledge of the area where I live. I have also included my general objections to various policies within the plan.

Policy P2: Green Belt Status
There is no justification or believable rationale that the land in question can be removed from the green belt. This view is the opinion of the local residents shown in a petition and demonstrates the strength of local opinion against the proposed development. The residents are overwhelmingly disappointed with those they have elected to represent them, and are horrified that they have agreed to adopt such policy.

National policy on the Green Belt, as set out in the National Policy Planning Framework, makes clear that most development in the Green Belt is inappropriate and should only be approved in very special circumstances. Planning guidance also states that unmet housing need is unlikely to outweigh the harm to the Green Belt to constitute the very special circumstances justifying inappropriate development within the Green Belt.

Amongst other relevant factors, the National Framework states:

- The core planning principles that underpin plan-making include both protecting the Green Belts and recognising the intrinsic character and beauty of the countryside.
- Once established, Green Belt boundaries should only be altered in exceptional circumstances.
- The purposes of the Green Belt include checking the unrestricted sprawl of large built-up areas, preventing neighbouring towns merging into one another, and assisting in safeguarding the countryside from encroachment.

Therefore, the Council’s plan is at completely at odds with the Government’s national policy, and alternative, more suitable and logical action should be taken – e.g. the National Framework does allow for redevelopment of previously developed sites (brownfield land) – although again, under certain guidelines.

- The large number of houses (385 homes on Green Belt land in West Horsley alone) identified for potential development in West Horsley would be totally out of character with the existing make-up and layout of the village.
- The village settlement is comprised of low density housing with a considerable mix of ages and housing styles, including a good number of historic buildings
- The need for so many houses in Guildford borough, never mind West Horsley, has not been proved in the Consultation documents.

Through a 2014 housing survey, West Horsley Parish Council has confirmed a limited need for 20 affordable homes for local people who want to remain in the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/601</th>
<th>Respondent: 10804993 / Alex Laing</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>I would like to object to the Guildford 2016 Draft Local Plan in the following areas:</td>
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<td>- I object to any and all reduction of the green belt</td>
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<td>- I object to any removal of villages from the green belt</td>
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<td>• I object to the fact that this plan, if implemented, would result in the merging of all villages along the A3 from the M25 to The Hog's Back, to become a metropolis</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<th>Comment ID: PSLPP16/941</th>
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<td><strong>Document:</strong></td>
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<td><strong>I Object to the 2016 Local Draft Plan</strong></td>
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<td>I wish to record my strong objections to the Draft Local Plan which is out for public consultation currently.</td>
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<td>I live in West Horsley and worked hard to be able to afford to purchase a house in this gorgeous part of the world. I enjoy my rural lifestyle: walking at Sheepleas with my family and dog and being surrounded by green, open space. Had I wished to live in an urban location I would have bought a property within Guildford itself, Inner London or any other built up part of the world.</td>
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<td>I wish to protect the Green Belt from erosion by possible future disproportionate development, particularly at this development for housing is based on a housing need which has little or no evidence to support it.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td>Please note that I object, very strongly, to the following:</td>
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<td>Lack of evidence of the housing need in the borough;</td>
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<td>Insetting of villages thus allowing increased development into the future;</td>
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<td>The proposed erosion of the Green Belt in any way, shape or form;</td>
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<td>The length, complexity and most specifically the absurdly short time frame for consultation of the Draft Local Plan;</td>
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<td>The council ignoring the existence of the numerous suitable brownfield sites within the borough which could be used for future development;</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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I appreciate the need for housing. However, developers will choose the easiest sites to develop (to maximise their profits) and these are the greenfield rather than the brownfield sites. As housing needs may drop due to Brexit, there is a risk that the greenfield sites will be lost and the unsightly brownfield sites remain undeveloped (e.g., the Portsmouth Rd site). I would like to see a system to ensure that NO greenfield sites are released until the brownfield sites are used.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attended documents:

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**GBC fails to make any allowance for planning constraints, particularly the Green Belt**

The housing need projections of GL Hearn are taken by GBC directly as the housing targets proposed in the Local Plan. They therefore fail to take into account any of the significant constraints which limit the supply of housing across the borough, in particular the large proportion of land which currently falls within the Metropolitan Green Belt. They also fail to allow for the already over-stretched infrastructure.

Other local plans across the country have adjusted their housing targets to reflect such constraints. However, GBC chooses to ignore them. This is despite having a revised Green Belt policy P2 in the Local Plan which states that “The Metropolitan Green Belt will continue to be protected”.

In order to meet its high housing targets, GBC proposes to remove large swathes of land from the Green Belt for use as housing. This is contrary to ministerial guidance and planning inspectorate decisions which continue to support the position that unfulfilled housing need does not constitute the ‘very special circumstances’ needed to justify building on Green Belt land.

The majority of the land being proposed by GBC for development under the revised Local Plan is currently part of the Metropolitan Green Belt.

Throughout the Local Plan consultations many thousands of residents across the borough have written to object to GBC’s approach towards this fundamental issue – there were over 25,000 comments in the 2016 consultation, mostly opposing the plan. Judging by the revised 2017 Local Plan these voices have again been ignored by GBC.

I am strongly opposed to GBC’s position on this issue and accordingly:

**I strongly OBJECT to the borough housing targets set out in Policy S2.**

1. **POLICY P2 Green Belt Policy**
The revised Green Belt Policy P2 continues to make the hollow promise that “The Metropolitan Green Belt will continue to be protected”. However, despite minor changes it has failed to revise Paragraph 4.3.13 which proposes to inset the village of East Horsley from the Green Belt.

There is no justification for this approach. East Horsley is a rural village. Its housing density is low - the average density of housing is just 8 dwellings per hectare. East Horsley makes an important contribution to the Green Belt of this area, providing openness, picturesque green spaces and wildlife corridors which support a rich biodiversity.

If East Horsley is inset from the Green Belt, as proposed in the revised Local Plan under Policy P2, then important Green Belt planning protection will be lost over land currently within the settlement area. This will inevitably lead to increased development within this area and the loss of openness, destruction of trees and hedgerows, diminished biodiversity and the impairment of picturesque views of this rural village.

Accordingly:

*I strongly OBJECT to the insetting of East Horsley proposed as part of Policy P2.*

1. **SETTLEMENT BOUNDARY**

I also note one new change made to the proposed settlement boundaries of East Horsley under the revised 2017 local plan, as detailed in the accompanying Appendix H maps for East Horsley (South). The Amendment 4 on this map addresses land in the southern part of the village designated as being within ‘the identified boundary of the village’ and which is currently Green Belt land outside of the settlement area. However, under Amendment 4 the settlement boundary is to be extended further south to encompass all of this area.

This is land which is close to and in some parts directly adjacent to the Surrey Hills AONB. It is a very low density part of the village located in a highly distinctive rural setting including in Chalk Lane a sunken chalk lane, a single track road that dates back for many hundreds of years.

There is no justification to bring such land within the settlement area of the village. This area of the village has benefitted from Green Belt protection for many years but this proposed change would have a significant adverse impact and lead to the destruction on its character. Accordingly:

*I strongly OBJECT to the movement of the settlement boundary proposed under Amendment 4 in Appendix H map of East Horsley (South), proposed as part of Policy P2.*

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
• There is no explanation as to why West Horsley has been chosen to be removed from the green belt and no justification for doing so.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11760  Respondent: 10805537 / Robert Mote  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). This is a very shortsighted proposal and will do nothing to enhance the areas. I cannot see any exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

The Plan should develop the existing brownfield site at Burnt Common rather than developing Garlick’s Arch (A43).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12421  Respondent: 10805537 / Robert Mote  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). This action does not meet National Planning Policy which requires for an exceptional circumstance to justify Green Belt boundaries to be altered or for development on Green Belt. There are no exceptional circumstances.

Furthermore as council tax payers we rely on Guildford BC to protect our environment and standard of living, not just to surrender large areas of Green Belt land without due thought as to its being done and for appropriate consideration as to whose interests are being served.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

The Plan should develop the existing brownfield site at Burnt Common rather than developing Garlick’s Arch (A43).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12446  Respondent: 10805537 / Robert Mote  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
** I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** pslp171/1357  **Respondent:** 10805697 / Jill Kempster  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

*Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )*

I have lived in my current house for 50 years and wish to make a plea re the fields, trees and hedges surrounding the village, which provide habitat for the abundant flora and fauna remaining and should be protected.

Nightingales migrated here annually to nest in the black [illegible word x2] until the late 1960’s, when activity – lorries etc. for the development of Old Cross Tree Way Estate, disturbed them, never to return.

Hedge-hogs are still resident here, (a declining species national), and many other birds, animals and reptiles, which I could list, but too numerous for this note.

Quality of life for humans, depends on wild life, greenspaces, and less traffic, congestion and pollution.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPP16/15265  **Respondent:** 10806241 / Michael Shattock  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

*Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )*

I strongly object to the removal of the village of Chilworth and surrounding villages from the Green Belt. This will guarantee that there is no protection against development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPP16/4300  **Respondent:** 10806369 / Michael Evans  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

*Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )*
Taking West and East Horsleys out of the Green Belt through insetting, is a monstrous proposal and looks to be a devious piece of methodology, certainly not worthy of Guildford Borough Council and the integrity of its valued Councillors. Our Borough and Parish Council representatives are better than this and would do well to resist the pressures from Central Government and developers to escalate local development through these proposals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/4347</th>
<th>Respondent: 10806465 / Moya Miller</th>
<th>Agent:</th>
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<td>I refer to my e.mail of 12th June which received an acknowledgement but no reply. This e.mail referred specifically to my objection to the local plan at Garlicks Arch and the proposed 400 houses &amp; industrial area, on land which I understand is possible flood risk for the Sendmarsh area.</td>
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<td>I wish to object further:</td>
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<tr>
<td>To the removal of Send from the green belt.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<th>Comment ID: PSLPP16/9733</th>
<th>Respondent: 10806561 / Deborah Stephens</th>
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<tr>
<td>P2 I object to the villages of East Horsley and West Horsley being removed from the Green Belt. I believe that the introduction of the Green Belt, was a policy introduced to protect the countryside, agricultural land, wildlife and its habitat, forestry and to prevent urban sprawl. I feel that the pressure to build houses, particularly in popular and &quot;desirable locations&quot; is making governments consider allowing these valuable measures to be set aside.</td>
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<th>Comment ID: PSLPP16/5767</th>
<th>Respondent: 10806945 / Chris Lee</th>
<th>Agent:</th>
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<tr>
<td>Objections to Guildford Borough Proposed Submission Local Plan (June 2016)</td>
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</tbody>
</table>
I object strongly to the Guildford Borough Proposed Submission Local Plan (June 2016) as

1) I object to not protecting the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1302  Respondent: 10807745 / Belinda Middleton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the draft 2016 draft local plan. [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998]

1) I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) as there are no exceptional reasons for doing so.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/849  Respondent: 10807745 / Belinda Middleton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Plan states: “4.3.16 National planning policy requires that Green Belt boundaries are only amended in exceptional circumstances and that this must be undertaken as part of the Local Plan process. I consider that exceptional circumstances exist to justify the amendment of Green Belt boundaries in order to facilitate the development that is needed and promote sustainable patterns of development.”

1) In the introduction to the Policy statement, numerous sites are taken out of the Green Belt including Gosden Hill, Blackwell Farm, Garlick’s Arch, Burnt Common, HM Prison Ripley Road, Send, and a number of villages. The Plan fails to detail the exceptional circumstances that have been identified for each site that is to be taken from the Green Belt.

2) It appears therefore that the Plan is based on an assumption that because the housing number cannot be accommodated on brownfield or previously developed land in the Green Belt, it is legitimate to move the boundaries. A blanket change to Green Belt boundaries is being made to facilitate development. That is not in accord with the NPPF or ministerial statements.

1) The removal of Green Belt protection from the site of HM Prison, Ripley Road, means that it could come forward for housing development. The nearest feasible access to the A3 is at the A247 junction.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1053  Respondent: 10807841 / Bernard Stutt  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

P2. The removal from the Green Belt of homes in Guildford Road, northern end of Glaziers Lane, Flexford, Walden Cottages and Palm House Nurseries traveller site as this could enable development within these areas at a much higher density than now. This is a wrong decision as it would impinge on the openness of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11043  Respondent: 10809377 / Bernice Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

2. POLICY P2

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council's to give away and once it is gone it is gone forever.

Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the plan would involve the loss of "only" 1.6% of the borough's Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an "acceptable" percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council's growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers' hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "...the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.
I object to the "insetting" of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the "openness" of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF's other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To "inset" two-thirds of the borough's rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough's location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed "insetting" and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17's aim of "empowering local people to shape their surroundings" and other NPPF provisions. Paragraph 4.3.17 states that "the general extent of the Green Belt has been retained." I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called 'strategic sites' of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick's Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a 'special circumstance') to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC's Green Belt & Countryside Report does not address Garlick's Arch, so there is no evidence base to support including this site.

Rather than developing Garlick's Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/11067  **Respondent:** 10809377 / Bernice Williams  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

SITES - POLICIES A1 TO A57

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

- I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that "allocating these sites does not grant planning permission for development." However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received
20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

- The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.
- Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied.
- Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

- Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/13530  Respondent: 10810145 / R Cope  Agent:</th>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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I OBJECT specifically to Ripley and Send Villages being removed from the Green Belt. The green belt was intended to be permanent, as required by the National Planning Policy Framework, and there are no special circumstances to justify abandoning it. Send’s Green Belt provides an essential buffer stopping Woking and Guildford becoming on conurbation. Local councillors and central government gave a clear election promise to protect Green Belt ad this reneges on it, Developers will be quick to take advantage and there will be nothing to stop them

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/3414  Respondent: 10811169 / Mollie Storrar  Agent:</th>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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</table>
I have been resident in East Horsley for about 25 years and I have carefully considered the Plan which you have made available for comment.

**Green Belt**

**-I object** to the proposal to inset East Horsley from the Green Belt. This proposal runs against the Borough's own stated policy P2 in which is quoted "we will continue to protect the Metropolitan Green Belt".

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

*Attached documents:*

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**Comment ID:** PSLPP16/3335  **Respondent:** 10811233 / David Storrar  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I have been resident in East Horsley for about 25 years and I have carefully considered the Plan which you have made available for comment.

- **I object** to the proposal to inset East Horsley from the Green Belt. This proposal runs against the Borough's own stated policy P2 in which is quoted "we will continue to protect the Metropolitan Green Belt".

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

*Attached documents:*

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**Comment ID:** PSLPP16/11889  **Respondent:** 10811361 / Simon Crago  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas.

In addition, I object to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. Exceptional circumstances are required for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.
I believe that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to all strategic sites proposed in the draft Plan to be built in the Green Belt.

I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints.

There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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2. I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT specifically to Ripley and Send Villages being removed from the Green Belt. The green belt was intended to be permanent, as required by the National Planning Policy Framework, and there are no special circumstances to justify abandoning it. Send’s Green Belt provides an essential buffer stopping Woking and Guildford becoming one conurbation. Local councillors and central government gave a clear election promise to protect Green Belt ad this reneges on it, Developers will be quick to take advantage and there will be nothing to stop them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

It seems you GBC have a complete disregard for us local residents of Send & Ripley, we rise thousands of objections to building on the Green Belt surrounding our village and you go ahead and change your local plan, so we all have to object again, but this time you increase your greed for land and housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Green Belt:
The Green Belt is a policy for controlling urban growth. The idea was developed so as to have a ring of countryside where urbanisation would be resisted, maintaining an area where agriculture, forestry and outdoor leisure could be expected to prevail. The fundamental aim of a Green Belt policy is to prevent urban sprawl by keeping land permanently open, and consequently the most important attribute of Green Belts is their openness.

The Metropolitan Green Belt around London was first proposed by the Greater London Regional Planning Committee in 1935. The Town and Country Planning Act 1947 then allowed local authorities to include Green Belt proposals in their development plans. In 1955, the then Minister of Housing Duncan Sandys encouraged local authorities around the country to consider protecting land around their towns and cities by the formal designation of clearly defined Green Belts, to prevent urban sprawl.

The 2012 National Planning Policy Framework (NPPF) issued by the Government clearly sets out the following purposes (amongst others) for including land with the Green Belt:

- To check the unrestricted sprawl of large built-up areas
- To assist in safeguarding the countryside from encroachment
- To preserve the setting and special character of historic towns

How do you reconcile the Wisley Airfield proposal, and the removal of the Horsleys from the Green Belt, with the NPPF’s guidelines above?

It appears that you now want to ignore the very reason for having designated Green Belts around urban areas, and specifically around my village of East Horsley. I strongly OBJECT to your proposals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13484   Respondent: 10816545 / Kent Atkinson   Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Comment ID: PSLPP16/1653   Respondent: 10816705 / Maggie Cole   Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
2. I object to not protecting the Green Belt

I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield and Garlick’s Arch and the subsequent urban sprawl. The whole beauty and character of the area are the individual villages. There are **no exceptional circumstances** for these villages being removed, as required by the National Planning Policy.

There is a suitable brownfield site at Burnt Common that should be developed rather than developing Garlick’s Arch.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Respondent: 10816865 / William Adrian Watson</th>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( )</td>
<td>is Sound? ( )</td>
</tr>
<tr>
<td>Being an East Horsley resident , it is with deep concern that I submit my objection to the proposed local plans for the Horsleys.</td>
<td>The development of 533 would be totally against Guildford Borough Council's definition of a conservation area; the plans to remove the Horsleys' green belt would be both damaging to the character and ecology of the villages.</td>
<td>A printed statement ,in 2014 , by Guildford Borough Council regarding its planning policy states : &quot; We interpret national and regional planning policy and prepare the Guildford Local Development Framework to guide development in the borough. This framework covers a wide range of issues including development in Guildford town centre and elsewhere in the borough, new homes, PROTECTING THE NATURAL AND HISTORIC ENVIRONMENT INCLUDING GREEN BELT &quot;.</td>
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<tr>
<th>Comment ID: PSLPP16/12191</th>
<th>Respondent: 10816993 / Jane Roberts</th>
<th>Agent:</th>
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<td>I OBJECT to not protecting the Green Belt (Policy P2)</td>
<td>This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.</td>
<td>The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt</td>
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| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |

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<th>Respondent: 10816865 / William Adrian Watson</th>
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<td>is Sound? ( )</td>
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<td><strong>I object to not protecting the Green Belt</strong></td>
<td>I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield and Garlick’s Arch and the subsequent urban sprawl. The whole beauty and character of the area are the individual villages. There are <strong>no exceptional circumstances</strong> for these villages being removed, as required by the National Planning Policy.</td>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of “About Guildford” (published by the Council) on page 5 states that “…the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.
GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/6113  **Respondent:** 10817121 / Roger Adams  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**POLICY P2: Green Belt**

I OBJECT to this policy.

Local Plan Policy P2 states that GBC “will continue to protect the Metropolitan Green Belt”.

NPPF rules permit authorities to make allowance for factors which may constrain the delivery of new housing. This would include protecting the Metropolitan Green Belt and the Surrey Hills Area of Outstanding Natural Beauty (‘AONB’). Although these areas make up a large proportion of the land area of Guildford Borough, I cannot find GBC’s attempt to reduce its housing target in order to take account of such constraints stated anywhere.

Thus, GBC appears to ignore its own Policy P2 through the housing policies that it has set out in the Local Plan. The analysis included in the Appendix seems to show that around 65% of the developments proposed in the Proposed Submission Local Plan are to be built on land currently within the Metropolitan Green Belt. This is surely at odds with its stated policy of protection of the Green Belt.

Furthermore, I believe that GBC has incorrectly interpreted para 83 to 87 of NPPF. Para 83 clearly states green belt boundaries should be altered only “in exceptional circumstances”. Ministerial Guidance on the Green Belt (reference Brandon Lewis MP and Nick Bowls MP 17/1/14 and 18/6/14 respectively) show unmet housing need alone is not likely to qualify as exceptional circumstances.

In addition, Sir Eric Pickles when Secretary of State for Communities and Local Government drew attention to the NPPF which states that the Green Belt may be altered “…only in exceptional circumstances…” . Sir Paul Beresford , MP for Mole Valley constituency, also commented that “we see in the NPPF that Green Belt protection is specifically cited as a consideration which would override the need to meet housing targets. This is a clear statement of government policy.”

Thus I OBJECT to this policy as I believe that this policy is inconsistent with itself and runs counter to the NPPF guidelines.

I would also like to add a quote from the Campaign to Protect Rural England (CPRE) which says (my underlining):

“Altogether the new plan proposes to build some 7,000 houses on land that is currently Green Belt. This includes a so-called ‘urban extension’ at Blackwell Farm on the Hogs Back (pictured) and two thousand houses at Wisley – this despite the Council’s own planning officers recommending refusal of permission for development at Wisley. The proposed loss of such a huge area of Green Belt in the borough is completely unjustified, especially when local opinion is so strongly against giving up any Green Belt land for development. It appears that the Council is treating both the countryside and the local community with contempt.”

I think the strength of feeling by local people can be gauged from the thousands of letters sent protesting about the previous draft plan and the various past and ongoing campaigns being waged by locals against these GBC initiatives.
In addition I OBJECT to the following paragraphs within this policy.

a) Paragraph 4.3.13: Proposal to inset East Horsley from the Green Belt

East Horsley is a rural village. Its Green Belt status has been a key factor in preserving its character. Policy P2 proposes that East Horsley should be inset from the Green Belt, instead of being ‘washed over’ as it is today.

Its current status, i.e. ‘washed over’ by the Green Belt, has not been a serious constraint to development within the village. For example, GBC’s planning records indicate that no less than 149 net new homes were added to the village housing stock through in-filling and brownfield developments between 2000 and 2015.

GBC attributes in paragraph 4.3.12 the need to inset East Horsley to NPPF requirements as follows:

“the national planning policy states that only those villages whose open character makes an important contribution to the openness of the Green Belt should be included in the Green Belt. “.

Anyone bothering to walk around East Horsley would recognise that it does so.

If I may quote some figures from our local parish council; “No less than 36% of East Horsley is composed of woodlands, whilst inside the settlement area there is an average housing density of just 8.1 dwellings per hectare (‘dph’). Woodlands and large residential gardens make a vital contribution towards biodiversity, provide wildlife corridors, and furnish those open spaces which are vital to the character of the greenbelt. It is one thing for a planner to study a map and see a settlement area filled with housing, but it is quite another actually to come to a rural village like East Horsley and see how the Green Belt has preserved the rural character and openness of this village.”

I have already commented above on what I believe to be GBC’s misinterpretation of the NPPF. In addition NPPF paragraph 17 specifically states as part of its 12 principles that planning should be about “empowering local people to shape their surroundings”. Comments on local social media sites and discussions with inhabitants of East Horsley lead me to conclude that this policy does not shape the surroundings in the way local people would wish. This argument is augmented by the number of responses received by GBC regarding the former iteration of the draft local plan. I believe this was around 20,000 most of which were opposed to it.

I can see no facts or arguments within P2 to support GBC’s argument to inset East Horsley from the Green Belt. Nor do I believe it meets NPPF para 17.

I OBJECT therefore to this policy.

b) Paragraph 4.3.16 and Proposals Map: Settlement Boundary changes in East Horsley

GBC proposes to make a number of changes to the settlement boundaries of East Horsley and so expand the settlement area.

The NPPF is clear that every movement in settlement boundaries must be justified by ‘exceptional circumstances’.

GBC states in this paragraph that such “exceptional circumstances exist to justify the amendment of Green Belt boundaries in order to facilitate the development that is needed and promote sustainable patterns of development”. GBC justifies the need to make such changes in settlement boundaries in order to meet unfulfilled housing need in the borough in the Green Belt & Countryside Study and its accompanying Topic Paper.

However, Green Belt rules make it clear that unfulfilled housing need is not normally considered to be ‘an exceptional circumstance’. If it were the entire Green Belt would disappear.

Therefore I OBJECT therefore to this policy.

c) Paragraph 4.3.17: Proposal to remove Wisley Airfield from the Green Belt

I OBJECT to the proposal to remove Wisley Airfield from the Green Belt and to the planned development of in excess of 2000 dwelling thereon. The only justification for this proposed change appears to be unfulfilled housing need which is not considered an exceptional circumstance
This proposal runs counter to the wishes of local people and also to the Council’s own planning officers’ recommendation. Indeed GBC’s Planning Officer, in assessing a previous planning application from the developer of this site, rejected their application, arguing that:

*It has not been demonstrated that the benefits of the proposal amount to very special circumstances such as to clearly outweigh the harm to the Green Belt and the other harm identified.*

Furthermore this development would be little short of catastrophic for the local villages, including East and West Horsley, Ripley and Ockham.

I have commented further on this matter under Site A35 below.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/6116  **Respondent:** 10817121 / Roger Adams  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Conclusion**

Policy P2 of the GBC Draft Local Plan states that “We will continue to protect the Metropolitan Green Belt”

It seems to me that in West and East Horsley and surrounding villages the GBC draft Local Plan is doing exactly the opposite. Given the scale of the developments proposed, the effect on the infrastructure (with its current deficiencies and shortcomings) and lack of specified commitment to improve matters the villages will suffer very badly from the increased volumes of inhabitants and traffic to the extent that their existing village character will be lost. And that of course runs contrary to Policy D1: Making Better Places when considered in its widest context, which is my final objection.

I would appreciate confirmation of the receipt of this email.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** pslp171/1647  **Respondent:** 10817601 / Gerald Watson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the proposal to inset Send Business Park from the Green Belt because it is effectively an old non-conforming user in an area of outstanding countryside, adjacent to the beautiful Wey Navigation. There is highly restricted vehicular access along Tannery Lane in both directions and further expansion of development at this location detracts from the openness of the Green Belt and is inappropriate.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
Comment ID: PSLPP16/5993  Respondent: 10817633 / M Mansbridge  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to Send Village and Send Marsh being removed from the Green Belt, which is permanent according to the National Planning Policy Framework. There are no Special Circumstances to justify this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16822  Respondent: 10817633 / M Mansbridge  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Send Village and Send Marsh being removed from the Green Belt, which is permanent according to the National Planning Policy Framework. There are no Special Circumstances to justify this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1482  Respondent: 10817633 / M Mansbridge  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to POLICY 2 paragraph 4.3.15 to inset Send Business Park from the Green Belt: because Tannery Lane is totally unsuitable for a large increase in traffic being a single track road and the area is an outstanding countryside amenity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/469  Respondent: 10818177 / Heather Coussens  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the proposal of Send being removed from the Green Belt. I believed the current council wished to protect such areas. Green belt is a buffer between town and roads, plus a safe haven for wildlife. There are many ancient trees around this area, especially in the A43 proposal. I want to live in a green leafy village not a crowded, concrete mass.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
In objecting to the proposed Plan I would first like to make it clear that I am not opposed in principle to the loss of Green Belt land for housing provided it is only done as the ultimate last resort. However if we are to protect the Green Belt for future generations we need to ensure it is only lost after strict examination against laid down criteria and after all suitable Brown Field are fully utilised.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Objection to Proposed Submission Local Plan : Strategies and Sites June 2016

The green belt in Surrey has supported the quality of life of people throughout Surrey and protected the over development of areas which might otherwise by now become part of London. I fundamentally object to not protecting the Green Belt (Policy P2) and specifically to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Send should not be taken out of the green belt. Send provides a valuable green belt buffer between Woking and Guildford.

Has the council given consideration to the development of brownfield sites in the borough before destroying green belt land?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Policy P2 Green Belt at paragraph 4.3.15
I object to the proposal to inset Send Business Park from the Green Belt because:
Access along Tannary Lane is restricted and would not be suitable for increased usage from an expansion of the Business park.
Send should not be taken out of the Green Belt. Send provides a valuable green belt buffer between Woking and Guildford.
Has the council given consideration to the development of brownfield sites in the borough before destroying green belt land?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the proposal to remove Send and Ripley from the green belt

Removal of Send and Ripley from the Green Belt is almost certain to result in one massive development area on both sides of the A3 road, all the way from the M25, down to the North Downs. The villages will be entirely swallowed up to become like those to our North East at Surbiton, New Maldon, Worcester Park and all the way through to Sutton and beyond.

For Guildford to retain its current charm, it is vital that the village environments should be maintained for future generations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I am writing to strongly object to the latest draft local plan proposed by Guildford Borough Local Council.

Once again the issue of removal of Send from the Green Belt has been proposed and new housing developments planned on areas not previously considered. If all the housing and business building went ahead in and around Send/Ripley the area would be gridlocked. The increasing traffic using the M25 and A3 already has a detrimental effect on the two villages at rush hour times morning and evening.

No thought has been given to this new plan and infrastructure is not in place to deal with all the extra cars and people this will bring to the local area.

Why does Guildford Borough Planners keep trying to add new measures to local planning when residents of Send and Ripley have made their feelings known through meetings at Lancaster Hall and objection letters about previous plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to any removal of any villages from the Green Belt P2

- I object to the blatant ignoring of the well-established policies of the Green Belt (NPPG 79-83) to protect open space, prevent encroachment into the countryside and stop linear development leading to the joining together of developed communities have been ignored in the proposals for Send. This plan will produce a huge overload on local and main roads, overcrowd our schools and put enormous pressure on the local surgery and hospitals. It will effectively join Send and Burpham along the A3 creating exactly the type of urban sprawl the Green Belt was set up to defend against. P2

I OBJECT to the fact that this plan represents a terrible sentence for our village. We are destined to become a suburb of the conurbation of Guildford and Woking. NPPG 83 states that the Green Belt should only be altered in “exceptional circumstances”. P2

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to any removal of any villages from the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to the fact that this plan represents a terrible sentence for our village. We are destined to become a suburb of the conurbation of Guildford and Woking. NPPG 83 states that the Green Belt should only be altered in “exceptional circumstances”.

THERE ARE NO EXCEPTIONAL CIRCUMSTANCES IN SEND.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to the proposal to insert Send Business Park from the Green Belt because:

- It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation
- There is highly restricted vehicular access along Tannery Lane in both directions
- It will make the erosion of the green belt in our village worse
- Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate

I OBJECT to the fact that these changes represents a terrible sentence for our village. We are destined to become a suburb of the conurbation of Guildford and Woking. NPPG 83 states that the Green Belt should only be altered in “exceptional circumstances”.

THERE ARE NO EXCEPTIONAL CIRCUMSTANCES IN SEND.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

POLICY 2 (Para 4.3.15)-SEND BUSINESS PARK

The removal of this existing development from the Green Belt will attract further businesses to the site. As stated in my objections to A42 (above), Tannery Lane is totally unsuitable for any more traffic, especially large commercial vehicles. Additional development will detract from the natural beauty of the location beside the Wey Navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional
For Site A43 Garlicks Arch this is supported by the decision in a recent (June 2016) Outline Planning Application (16/P/00783) for a smaller development on this site was refused by GBC. The report states that “there are no overriding reasons that would constitute very special circumstances to justify the harm that it would cause to the Green Belt”. How can it therefore now be considered appropriate to include this site for Insetting from the Green Belt?

There are no exceptional circumstances that support this.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

I object that the recommendation issued by the Minister of State for Housing & Planning in June 2016 regarding protection of the greenbelt and a commitment toward identifying brownfield sites is being totally disregarded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

We are writing to confirm that we object to the proposed changes to move the green belt boundary to exclude the fields behind the Shalford Village Hall and to extend the village settlement boundary to include these fields.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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I object to Send village being removed from the Green Belt. The Green Belt was intended to be permanent – local councillors and central government gave a clear election promise to protect the Green Belt and this reneges on it. Sends Green Belt provides and essential buffer between Woking and Guildford becoming one large urban area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I strongly object to removing Send from the Green Belt. Green Belt exists for very good reasons to help protect the countryside from inappropriate development. Once areas are removed from the Green Belt and developed, there is no going back. If the GBC Plan is not reconsidered the scale of development in the Green Belt along the A3 corridor would completely change the character of the area and cause considerable congestion as the A3 and local roads would not be able to cope. The A3 is already congested without this scale of development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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GUILDFORD BOROUGH DRAFT LOCAL PLAN

I object to the proposed local plan on the following grounds:

Green Belt – I am totally opposed to any loss of green belt land. Any loss to this important land, would create a dangerous precedence.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Thank you for the opportunity to comment on the current borough policy proposals.

Once again I wish to register my objections in the strongest possible terms. I do not support any development at all on the Green Belt and believe it is totally unnecessary.

I do not support removing any villages from Green belt status nor altering the current village boundaries. I do not wish to see the merging of Woking and Guildford or Send and Ripley or the spoiling of character of the environment I have lived in all my life and enjoyed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1459  Respondent: 10828737 / Claire Dawson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the removal of Send Business Park from the Green Belt (4.3.15). Send Business Park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification whatsoever for it’s insetting (removal) from the Green Belt, interesting that GBC have not attempted to offer a justification? Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12014  Respondent: 10828801 / Kathryn Fox  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the removal of Send Village from the Green Belt because the village and its countryside provide a necessary buffer between Woking and Guildford. The green belt was intended to be permanent.

2. I object to the building on the Green Belt at Send at Garlick’s Arch, Clockbarn Nurseries and Send Hill because it is not justified, the Green Belt is meant to be permanent and not continually eroded

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16778  Respondent: 10828897 / Christopher Merrick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Guildford Borough Council’s Proposed Submission Local Plan.
1. Taking any land in the borough out of the green belt
2. Building a new town on Wisley Airfield

Building on green field sites throughout the borough

All greenbelt designated areas must be retained to preserve agricultural land for the production of food and the countryside for leisure/tourism.

*Leave the greenbelt around Guildford alone, otherwise subtle erosion will mean the borough will resemble Greater London by 2031!*

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/6669</th>
<th>Respondent: 10828961 / Carey Lodge</th>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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1. Policy P2. I object in the strongest terms to any suggestion that Send and Ripley are to be removed from the Green Belt. This essential protection stops uncontrolled development filling in the green spaces between settlements. The whole nature of Guildford and its surroundings is a country town surrounded by villages and green spaces for residents and visitors to enjoy. The actions of the GBC have already shown how important it is for Send to remain under the protection afforded by Green Belt legislation. The Wey Navigation is used by thousands of people in boats, on cycles and walking the countryside in this area, which would be detrimentally affected by further building on the land along the canal. There would be significant pressure to do so if protection was removed and, as shown by the approval of plans for a new marina in Tannery lane, the GBC cannot be trusted to follow the will of Send residents. Land in surrounding boroughs are also facing threats of removal from Green Belt protection. There must be a whole landscape approach to development. Current proposals are threatening to cover this part of Surrey with concrete. GBC have made repeated promises to protect the Green Belt but have failed to deliver on them. Taking Send out of the Green Belt would put huge pressure on the green spaces within the village for unwanted and unnecessary development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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1. I object to the proposal Policy2 at paragraph 4.3.15, to inset Send Business Park from the Green Belt because:

- It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation
- There is highly restricted vehicular access along Tannery Lane in both directions
- Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate
I object to the insetting of other land within Send. Already developers are looking at building on the School playing fields which, it is proposed, will be removed from green belt protection. They have even asked me my thoughts on selling them part of my garden! This is in addition to all the other proposed building and extra houses recently, currently under review and proposed on residential plots. This is all too much for the small village of Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9624  Respondent: 10828993 / Naomi Rider  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I strongly object to removing Send from the Green Belt. Green Belt exists for very good reasons to help protect the countryside from inappropriate development. Once areas are removed from the Green Belt and developed, there is no going back. If the GBC Plan is not reconsidered the scale of development in the Green Belt along the A3 corridor would completely change the character of the area and cause considerable congestion as the A3 and local roads would not be able to cope. The A3 is already congested without this scale of development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6630  Respondent: 10829121 / Julie Brown  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to POLICY P2 – Green Belt

- No declaration of support for protecting the Guildford Green Belt, contrary to NPPF and government statements.
- No evaluation of value of local Green Belt as a public and private asset: it’s just treated as potential building land with a few inconvenient restrictions.
- Impact of Green Belt development on local agriculture ignored.
- Impact on rural leisure and tourism ignored.
- Impact on flood control ignored.
- Impact on carbon sink and knock-on effects for air pollution and climate change ignored.
- Impact on biodiversity ignored.
- Impact on natural heritage ignored.
- Impact on water catchment ignored.
- Impact on room for public space amenities (parks, cemeteries, waste facilities etc) ignored.
- Impact on rural business (e.g. mineral mining, film making) ignored.
- Impact on natural landmarks and views ignored.
- Harm to public health and wellbeing (physical, psychological) ignored.
- Allows excessive levels of development in breach of views expressed in last consultation and Conservative Party manifesto commitments at the last local elections.
- Has allowed ruling Councillors to argue that there is an acceptable percentage of Green Belt that should be sacrificed to development, when no such rule exists in the NPPF.
- Ignores alternative approaches, such as fair burden-sharing under which settlements would undertake to accommodate new development in proportion to their size.
- Disproportionate amount of development (most of it, in fact) to be in Green Belt. Too few new homes in urban areas where most people (especially the young and less privileged) want to live. This will act against much needed urban regeneration.
- “Insetting” of most villages disproportionate and unjustified in terms of their contribution under the NPPF to the purposes of the Green Belt. Based on flawed Green Belt and Countryside Study. Idea that most Guildford villages do not contribute to “openness” is subjective.
- Major settlement extensions allow indiscriminate housebuilding, as irregularly shaped villages are squared off to enclose green fields.
- Overall harm to Guildford Green Belt unjustified by any objective development need post-Brexit.
- Ignores most of NPPF 17 stipulations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/462  Respondent: 10829121 / Julie Brown  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Green Belt, Policy 2 paragraph 4.3.15 - Send Business Park taken out of the Green Belt
Taking Send Business park out of the Green Belt and further development detracts from the openness of the Green Belt
It is inappropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3795  Respondent: 10829281 / Kevin Nicholls  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am a Send Village resident of 25 years and am extremely concerned about the planned developments, not only in Send but also in the surrounding areas. These plans will only serve to destroy the way of life we have enjoyed for so many years. I am also appalled at the underhandedness of the council in the way it has tried to shoehorn the plans in at the last minute.

I therefore object to the local plan but in particular:
I object to Send Village being removed from the Green Belt. Local councillors and central government gave a clear election promise to protect the Green Belt and this reneges on it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<td>Please give extra time and thought to the concerns raised by myself and others regarding any infringement on the Green Belt and local infrastructures - once it goes there will be no turning back and a decision taken today could impact detrimentally on the future generations.</td>
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Comments/Objections on draft Local Plan

(Ripley, Burnt Common, Send Marsh and Send)

Would you please register my comments/objections on the above as follows:

1 Green Belt Issues

I am most concerned at the proposals for insetting of the above four villages, which as I understand it means removing these areas from the Green Belt.

I wish to register my formal objection to this proposal.

The insetting/removal of these four villages suggests that those areas do not make an important contribution to the openness of the Green Belt. Having referred to paragraphs 89-90 of the National Planning Policy Framework it appears that any new development construction in Green Belt areas will be considered inappropriate unless very special circumstances can be demonstrated. The Planning Authority will have applied this test and I am sure local residents will be interested to hear how this criteria was met.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I have read your proposed local plan and particularly the suggestions with regard to East and West Horsley – including Wisley airfield.

I fully understand the need for a steady increase in new housing to meet the demands of a growing population. But your plan seems far too aggressive in its proposal to increase the size of settlement areas such as East Horsley and to effectively take the village out of the green belt. Based on previously declined proposals for Wisley airfield I fail to see how you could find a workable proposal to put a new town on this site without the essential amenities – it would become a strange ghetto.

The Horsleys should contribute to meeting the need for increased housing in the borough. But this should be done in a way that is sensitive to the current environment and without any need to remove green belt ‘status’.

I Object to your local plan as currently proposed for the Horsleys.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the way the Green Belt is to be used for building when these homes seem to be far beyond the need, and the way in which figures have been put forward is dubious and unsupported. To suggest that over 60% of proposed homes should be built on Green Belt land is totally unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5858  Respondent: 10830785 / PE Whatley  Agent:

I object to the potential retraction of the promises repeatedly made at elections to protect the Green Belt. This should go down as one of the greatest crimes of the 21st Century, as it will set a precedent for all other local authorities to build over swathes of the country with no thought or regard for what is being lost forever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1258  Respondent: 10830785 / PE Whatley  Agent:

I object to the removal of the industrial area in Tannery Lane for similar reasons (policy 2 paragraph 4.3.15). Access to the site is wholly unsuitable for heavy traffic or large vehicles. The open areas around this site are of immense environmental importance and we owe it to future generations to preserve the Green Belt wherever we possibly can. There are absolutely no exceptional circumstances that could warrant such action, and it is in direct opposition to the views expressed by local residents in the past.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/177  Respondent: 10831201 / Norma Plank  Agent:

I wish to raise my objections to the draft local plan. I itemise the many areas below that I strongly object to:-

1) I object to all erosion of the Green Belt (especially when brown field sites are not exhausted)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to the proposal to remove the Horsleys from the Green Belt. The Metropolitan Green Belt has endured for over seventy years and has been the backdrop to the successful evolution of our village throughout this time. To remove it is to reverse over seventy years of wise conservation. I support the need for a proportionate and sensible increase in housing, but this could happen within the constraints of the Green Belt as it has in the past. Such building needs to reflect the existing character of the village and the houses and amenities within it. The practicality is that our village's removal from the Green Belt would mean that building standards will be lowered, and developers will be allowed to squeeze additional housing into completely unsuitable places. The ‘exceptional circumstances’ required before taking this action have not been demonstrated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

It seems to me that you have not listened to the thousands of objections to your proposal to remove the villages of Ripley, Send, Clandon and Wisley from the Green Belt and turn them into towns by overdevelopment. There is no justification for this and no planning for the aftermath of chaos that will occur. The village roads cannot be widened, no traffic study has been carried out, no new doctor's surgeries are planned and no new schools are planned. But you propose to solve 70% of a so called housing need of 13,860 new houses by concentrating only on four villages in the Green Belt without first investigating all brown field sites in and around Guildford. What you have done is to increase the size of developments in Send and restricted objections to these amendments. Given your practice of ignoring objections anyway it seems we live in a dictatorship where the people's wishes are not even considered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Last but not least, I object to Green Belt Policy 2 at paragraph 4.3.15 where it is proposed to inset Send Business Park from the Green Belt because: It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation. There is highly restricted vehicular access along Tannery Lane in both directions. Further expansion or development at this location is totally inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I have carefully considered the Proposed Submission Local Plan which Guildford Borough Council (“GBC”) has now published for public consultation. My comments are set out in this letter.

I have strong concerns about the Proposed Submission Local Plan and the evidence and assumptions which support it. In particular, I do not accept the scale of the house building programme which is being proposed by GBC. The target outlined represents a 25% increase in the housing stock of the borough, whilst I note that the Office of National Statistics (“ONS”) projects a population increase of some 15% for Guildford Borough over this same period. I also note that the Proposed Submission Local Plan includes the statement “We will continue to protect the Metropolitan Green Belt”. I fully and unequivocally support this policy. The Green Belt is a national asset which should be treasured; the whole character of Surrey will change over time if GBC allow the degradation of the Green Belt. If everytime there is pressure to build housing, GBC uses the Green Belt as an area for negotiation, the unique character of Surrey will be lost forever and the generations that follow will look at this moment as a trigger point in the decline of Surrey.

Unfortunately GBC appears to be in breach of this same policy through the housing policies it has set out in the Proposed Submission Local Plan, whereby some 65% of developments will be made on land that is currently Green Belt.

I am also concerned that the infrastructure proposals are inadequate even to meet the needs of what is here currently, let alone the proposed developments in the Local Plan.

POLICY P2: Green Belt
Paragraph 4.3.13: Proposal to inset East Horsley from the Green Belt Policy P2 proposes that East Horsley should be inset from the Green Belt, instead of being ‘washed over’ as it is today. Currently development is permitted within the settlement boundary, although this area is still considered to be Green Belt with a particular planning regime being applicable.

East Horsley is set in a rural location and the village has the look and feel of a rural village. Its Green Belt status has been a key factor in preserving that character. Moreover, being ‘washed over’ by the Green Belt has not been a serious constraint on development within the village. For example, GBC’s planning records indicate that no less than 149 net new homes were added to the village housing stock through in-filling and brownfield developments between 2000 and 2015. GBC attributes the need to inset East Horsley to NPPF requirements, arguing that the test for remaining ‘washed over’ is that the village should make an important contribution to the openness of the Green Belt. This East Horsley clearly does. No less than 36% of East Horsley is composed of woodlands, whilst inside the settlement area there is an average housing density of just 8.1 dwellings per hectare (‘dph’). Woodlands and large residential gardens make a vital contribution towards biodiversity, provide wildlife corridors, and furnish those open spaces which are vital to the character of the greenbelt. It is one thing for a planner to study a map and see a settlement area filled with housing, but it is quite another actually to come to a rural village like East Horsley and see how the Green Belt has preserved the rural character and openness of this village.

Today East Horsley is a picturesque and flourishing rural community, which has and continues to experience steady incremental growth as a result of being ‘washed over’ by the Green Belt. Therefore there is no need to change its status. I therefore OBJECT to the proposal to inset East Horsley from the Green Belt and requests that this proposal be dropped from the Local Plan.

Paragraph 4.3.16 and Proposals Map: Settlement Boundary changes in East Horsley
GBC are proposing to make a number of changes to the settlement boundaries of East Horsley and so expand the settlement area, as set out in the Proposals Map, with the justifications seemingly provided in the Green Belt & Countryside Study prepared by the consultants, Pegasus.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3868  Respondent: 10833537 / AC Vause  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick's Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a 'special circumstance' and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC's Green Belt & Countryside Report does not address Garlick's Arch, so there is no evidence base to support including this site.

Rather than developing Garlick's Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5796  Respondent: 10835169 / James Brennan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

GBC LOCAL PLAN

I wish to make the following comments;

I object to Effingham being taken out of the Green Belt.

However, if this has to be the case, the boundary proposed in the centre of the village is very weak and a better boundary would be Church Lane and thus keeping Lower Road and the Howard of Effingham School in the Green Belt.

I attach a map showing my proposed changes.

I trust that you will take my comments into consideration.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [LP2016 - James Brennan.pdf](#) (169 KB)

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I object to Send being removed from the Green Belt (Policy P2). The Green Belt land around Send and Send Marsh act as a buffer between Woking and Guildford. This is one of the tenets of The National Planning Policy Framework, namely point 80, which states that one of the purposes of Green Belt land is ‘to prevent neighbouring towns merging into one another’. It is vital to keep this buffer in place, not only for the local community, but because of the great natural beauty of the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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4. I object that Green Belt is being removed from its Protection.

I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). This will result in urban sprawl which is exactly why it was designated Green Belt in the first place. The cavalier approach of this Local Plan to summarily remove the Green Belt because it does not suit is, at best, convenient, and, at worst, criminal. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy. Why cannot the plan develop the existing brownfield site at Burnt Common, originally in the Draft, rather than developing Garlick’s Arch (A43)?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object that Green Belt is being removed from its Protection (Policy P2)

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required by the National Planning Policy. Why cannot the plan develop the existing brownfield site at Burnt Common, originally in the Draft, rather than developing Garlick’s Arch (A43)?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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</table>

I OBJECT TO THE 2016 DRAFT LOCAL PLAN
I OBJECT TO ALL EROSION OF THE GREEN BELT
I OBJECT TO THE REMOVAL OF ANY VILLAGES FROM THE GREEN BELT
I OBJECT TO THE DISPROPORTIONATE DEVELOPMENT IN ONE AREA
I OBJECT TO THE LIMITED CONSULTATION PERIOD
I OBJECT TO INCLUSION OF NEW SITES WITH UNDER 2 WEEKS NOTICE

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/2549</th>
<th>Respondent: 10836513 / Neil Graham</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
</tr>
</tbody>
</table>

Brown field sites: A part of any local plan should be to use up all brownfield sites first, before any other land for housing is considered. There are areas in the Guildford area where there are unoccupied pieces of land, derelict offices and industrial areas. In Guildford itself the areas around Walnut tree close and Slyfield come to mind but all other areas which need re-generation must be identified and used for housing needs before any other land is considered, particularly green belt land. Developer must be made to use brownfield land and not just proceed with what that see as the cheaper or easier options. I do not feel the changes to the plan have properly addressed this point.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/7053</th>
<th>Respondent: 10837089 / R. Robertson</th>
<th>Agent:</th>
</tr>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
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</tr>
</tbody>
</table>
Site A46 at Normandy has been designated as RED ZONE sensitive area by GBC, where development should **not** take place and should remain in the Green Belt.

The proposed development of site A46 would completely urbanise the semi-rural village of Normandy, destroying the open space. It would more than double the number of houses plus all the additions of commercial and other buildings and also the enormity of a very large secondary school - replacing grass with concrete. The whole purpose of Green Belt land is to provide a buffer from increased urbanisation, to provide a living, breathing 'green space'.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/7482  
**Respondent:** 10837313 / Mary Jane Gray  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

In general I object to the apparent failure of the GBC to firstly identify all available brownfield sites within the urban area for development and the continued support of the GBC for proposals that destroy Green Belt and open countryside particularly along the A3 corridor.

In general I object to the apparent failure of the GBC to firstly identify all available brownfield sites within the urban area for development and the continued support of the GBC for proposals that destroy Green Belt and open countryside particularly along the A3 corridor.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** pslp171/102  
**Respondent:** 10837313 / Mary Jane Gray  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

I object to the proposed removal of Send Business Park from the Green Belt under Policy 2.

{paragraph 4.3.25} of the Plan.I believe that this policy is will result in yet further commercial development at this site and takes no account of the poor vehicular access in both directions along Tannery Lane or the position of the site in open countryside adjacent to the Wey Navigation.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/8636  
**Respondent:** 10837665 / J.H. Lakeman  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )
I am writing to object to the proposed local plan and to express my concerns at the never ending assault on the countryside and Send's local environment. Policy P2 removal of villages from the Green Belt is particularly disturbing and I object most strenuously as it it sends the opposite message to your statement in the recent "about Guildford" publication- "One of the boroughs biggest assets is our significant green belt and major consideration is given to protecting this".

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/838</th>
<th>Respondent: 10837665 / J.H. Lakeman</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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</table>

I further object to the proposal to inset Send business park from the Green Belt- Policy 2 para's 4.3.15 as Tannery Lane is highly restricted in either direction for large commercial/industrail vehicles, being in an area of open countryside adjacent to the attractive Wey navigation in the Green Belt.

I have lived in Send since 1970 and increasingly in recent years have felt the need to add my voice to defend the peace and quiet I moved here for. GBC seems to have a predilection to ignore the ideals of the Green Belt and the laws constraints to take due account of inadequate infrastructure of roads, school and medical facilities and ignore the traffic and pollution implications in a disproportionate manner for our area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/173</th>
<th>Respondent: 10839009 / Jacky Fenton</th>
<th>Agent:</th>
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</thead>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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</tbody>
</table>

I strongly OBJECT to removing Send from the Green Belt, you are just using this to your advantage to allow for more development. The Green Belt around this area is permanently protected by the NPPF which prevents merging settlements! This area contains ancient woodland with trees from the 16th Century. 50% of new homes needed could be built on brownfield sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/5547</th>
<th>Respondent: 10839073 / Annie Hutchison</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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</tbody>
</table>
While I recognise that some level of new house building is necessary, I am concerned that the proposed Local Plan vastly overstates the need for both new housing and industrial expansion and does not take account of the limitations of the infrastructure in the Send area. Accordingly:

I object to the removal of Send village from the Green Belt. The inevitable result of this would be extensive development effectively removing the buffer between Guildford and Woking. Amongst the areas lost would be school playing fields and woodland: a great loss of amenity for all residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7612  Respondent: 10839233 / Sheila Harris  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

With reference to the latest GBC Local Plan, I strongly object to all the proposals noted in the Local Plan now submitted for further development and changes to the Green Belt Boundaries in Send, considering that these are not only significantly different from the previous proposals submitted in 2014 but are both flawed and ill conceived.

I wish to question why the Council consider it necessary to make incursions into current Green Belt areas without first exhausting all available 'Brownfield' sites in the Borough. It is my understanding that Government directives require these sites to be developed as a priority in order that the required housing demand can be satisfied before the need to spoil our beautiful countryside forever.

There are many detailed objections to the particular sites identified (i.e. Garlick's Arch Clockbarn Nursery and Winds Ridge) but my main point is that the development of 'Brownfield' sites is most likely to negate the requirement for these sites to even be considered.

I also object to the lack of clarity given with respect to the derivation of the housing requirement figures. It would appear that the figures have been based on an exaggerated housing need which has resulted in increased numbers from the previously submitted plan, an increase that can only be satisfied by building on Green Belt land.

I therefore reiterate my strongest objection to the Local Plan for Send in its current form and insist that Guildford Borough Council must reconsider the proposals in their entirety.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/95  Respondent: 10839233 / Sheila Harris  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the removal of Send Business Park from the Green Belt as proposed under Policy P2 (paragraph 4.3.15) of the Plan. I believe that this is the 'thin end of the wedge' that will result in yet further expansion of commercial building at this location which is totally inappropriate given its position within open countryside adjacent to the Wey Navigation and the poor vehicular access in both directions along Tannery Lane.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1317  Respondent: 10839265 / S.G. Saxby  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I support the removal from the Local Plan of site A.46 (land to the South of Normandy and North of Flexford) – 1,100 homes and school. The removal of site A47-50 homes (land to the East of the Paddocks Flexford.)

I object to the proposed change that Normandy settlement, Flexford settlement and Walden Cottages should be inset from the Green Belt. There is evidence in past planning appeals APP/Y3615/W/15/3002308, APP/Y3615/A/10/2140630 and APP/Y3615/A/10/2131590 that the land here contributes to the “openness” of the Green Belt.

There is evidence in the sustainability Appraisal para 10.4.7 that the agricultural land between the settlements is of BMV quality, exhibits ‘openness’ and contributes to the rural economy.

The land in and around the settlements of Normandy and Flexford Contributes to views into and from the Surrey Hills AONB (HOGS BACK.)

Policy P2 omits any assessment of the Green Belts value. The Green Belt is not just empty space but is an inhabited working environment that safeguards a certain [illegible word] of natural capital. There is no “acceptable” percentage (in the NPPF or anywhere else) of land that may be removed from the Green Belt.

I object to the changed “insetting” of 15 villages from the Green Belt and at “infilling” 12 of the borough’s Green Belt villages. I am concerned that settlement boundaries are to be hugely extended in many villages and that infilling is also proposed outside the settlement boundaries of 11 further villages. This is completely unplanned and unmeasured development outside the OAN.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/71  Respondent: 10839393 / F.A. Howell  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Policy 2 at paragraph 4.3.15

I OBJECT TO POLICY 2 AT PARAGRAPH 4.3.15 because

1) we are not an industrial area
2) Tannery lane (in both directions) is far too small to accommodate large lorries
3) Council has failed to provide a need for self build plots, additional employment floor space or space for travelling show people in this area.

Council has already received over 3000 objections to the Garlick's Arch site proposal from just one small area of Send (namely Send marsh), which on account of the population density is unanimous! When Council rejected the Wisley Airfield proposal unanimously, that had some effect, and likewise so should this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7518  Respondent: 10839649 / Lawrence Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

In general I object to the apparent failure of the GBC to firstly identify sufficient brown field sites within the urban area for development and the continued support of the GBC for proposals that destroy Green Belt and open countryside particularly along the A3 corridor.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7525  Respondent: 10839649 / Lawrence Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

With reference to Policy P2 of the GBC local Plan I strongly object to the removal of Send from the Green Belt. I believe that this is the 'thin end of the wedge' and will result in yet further erosion of this vital asset to the well being of the people of Surrey in the future.

The latest GBC Local Plan for Send includes a number of changes from the previous version put forward in 2014. I object to the manner with which these additional sites have been included and consider that these significant changes require the full consultation process to be effected not the shortcut procedure under Regulation 19 that the GBC are currently trying to implement.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/94  Respondent: 10839649 / Lawrence Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the removal of Send Business Park from the Green Belt as proposed under Policy P2 (paragraph 4.3.15) of the Plan. I believe that this is the 'thin end of the wedge' that will result in yet further expansion of commercial building at
this location which is totally inappropriate given its position within open countryside adjacent to the Wey Navigation and the poor vehicular access in both directions along Tannery Lane.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/6122</th>
<th>Respondent: 10839937 / Mark Pycraft</th>
<th>Agent:</th>
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</thead>
<tbody>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td>I wish to object to the proposed Local Plan for the village of Send, Send Marsh and the surrounding Green Belt area.</td>
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<tr>
<td>I object to the proposal to remove Send from the Green Belt (Policy P2). The National Planning Policy Framework (point 80) states that Green Belt land is vital 'to prevent neighbouring towns merging into one another'. Send and its surrounding Green Belt land plays precisely that role, between Guildford and Woking.</td>
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<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<tr>
<th>Comment ID: PSLPP16/11954</th>
<th>Respondent: 10840129 / Roy Smith</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<tr>
<td>I would like to object most strongly to the GLP especially;</td>
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<tr>
<td>1. The removal of the Horsleys from the Green Belt.</td>
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<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<tr>
<th>Comment ID: PSLPP16/11956</th>
<th>Respondent: 10840129 / Roy Smith</th>
<th>Agent:</th>
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<td>2. The extention of the settlement boundaries.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<tr>
<th>Comment ID: pslp171/931</th>
<th>Respondent: 10840161 / Janet Attfield</th>
<th>Agent:</th>
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<td>Comment ID: PSLPP16/10760</td>
<td>Respondent: 10840513 / Lee Webb</td>
<td>Agent:</td>
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<tr>
<td>I am very annoyed to see the proposed changes to the Greenbelt designation stated in this proposed plan. The Greenbelt designation was put in place to protect the green spaces, thus preventing pollution and protecting wildlife. They maintain local residents mental and physical health as they enjoy these spaces. The parent Greenbelt maintains the character of the villages and attract people with good incomes to the area.</td>
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<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Attached documents:</td>
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| Comment ID: PSLPP16/3506  | Respondent: 10840769 / Rosemarie Haxton  | Agent:  |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  |
| I object to the large proposed development of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.  |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document?  |
| Attached documents:  |

| Comment ID: pslp171/1504  | Respondent: 10840769 / Rosemarie Haxton  | Agent:  |
| Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2  |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  |
| As a local resident, I am very concerned about the proposals for the removal of our villages from the green belt and the extensive building projects that will mean we no longer live in villages with a village community and surrounding green areas and ancient woodland. The infrastructure will not sustain these proposed changes on such a large scale. My main objections are;  |
| 1) I OBJECT to the removal of 15 villages, including Ripley and Send, from the green belt. This will lead to wholesale, and often inappropriate developments.  |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document?  |
| Attached documents:  |

| Comment ID:  | Respondent: 10840769 / Rosemarie Haxton  | Agent:  |
| Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2  |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  |
| I object to the proposal to inset Send Business Park from the Green Belt because:  |
This is an old non-conforming user in an area of outstanding countryside next to the beautiful Wey Navigation.

There is highly restricted vehicle access along Tannery Lane in both directions that would not accommodate any increase in volume or type of traffic.

Any increased expansion or development at this site detracts from the Green Belt and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13847  Respondent: 10843233 / David Hardiman  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the proposal to remove the Horsleys from the Green Belt. The "exceptional circumstances" required before taking such action have not been demonstrated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13850  Respondent: 10843233 / David Hardiman  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

No sound reasons have been given for the proposed changes, which seem to be aimed solely at increasing the land available within the settlement for future additional development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3469  Respondent: 10843361 / Natalie Brown  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to POLICY P2 – Green Belt

- No declaration of support for protecting the Guildford Green Belt, contrary to NPPF and government statements.
- No evaluation of value of local Green Belt as a public and private asset: it’s just treated as potential building land with a few inconvenient restrictions.
- Impact of Green Belt development on local agriculture ignored.
- Impact on rural leisure and tourism ignored.
- Impact on flood control ignored.
- Impact on carbon sink and knock-on effects for air pollution and climate change ignored.
• Impact on biodiversity ignored.
• Impact on natural heritage ignored.
• Impact on water catchment ignored.
• Impact on room for public space amenities (parks, cemeteries, waste facilities etc) ignored.
• Impact on rural business (e.g. mineral mining, film making) ignored.
• Impact on natural landmarks and views ignored.
• Harm to public health and wellbeing (physical, psychological) ignored.
• Allows excessive levels of development in breach of views expressed in last consultation and Conservative Party manifesto commitments at the last local elections.
• Has allowed ruling Councillors to argue that there is an acceptable percentage of Green Belt that should be sacrificed to development, when no such rule exists in the NPPF.
• Ignores alternative approaches, such as fair burden-sharing under which settlements would undertake to accommodate new development in proportion to their size.
• Disproportionate amount of development (most of it, in fact) to be in Green Belt. Too few new homes in urban areas where most people (especially the young and less privileged) want to live. This will act against much needed urban regeneration.
• “Insetting” of most villages disproportionate and unjustified in terms of their contribution under the NPPF to the purposes of the Green Belt. Based on flawed Green Belt and Countryside Study. Idea that most Guildford villages do not contribute to “openness” is subjective.
• Major settlement extensions allow indiscriminate housebuilding, as irregularly shaped villages are squared off to enclose green fields.
• Overall harm to Guildford Green Belt unjustified by any objective development need post-Brexit.
• Ignores most of NPPF 17 stipulations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/199  Respondent: 10843489 / Philip Fleming  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I do not agree that the village areas should be removed from the Green Belt. This is effectively a way of lowering the hurdle to build on the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1450  Respondent: 10843553 / Maria Erskine  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I would like to express my total objection to all proposals to build on green-field sites in Surrey and elsewhere. There is clearly now great importance in exerting pressure to preserve all wild-life sites and green fields for future generations and building on such sites (even when they are relatively out-of-sight from general passers-by; in essence covert building) must be prevented with utmost attention to detail and fastidiousness.

The principle of protecting these crucial sites, even to the extent of economically disadvantaging the area, is clearly of such extreme importance, that failure to do so amounts to nothing but total dereliction of duty. This view is very typical
of the vast majority of people who live in all parts of the county and elsewhere. It is of utmost importance to everyone that you protect wild-life and farming sites for living creatures and ourselves.

When changes of the scale proposed are so vast it is difficult to comment on specific sites. Please regard this e-mail as an objection to all building proposals affecting wild-life and green field sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5979  Respondent: 10843585 / Jackie Payne  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to Send village being removed from the Green Belt. The Green Belt was meant to be permanent and there are no special circumstances to justify abandoning it. Send's Green belt is a buffer to keep Woking and Guildford merging. Local councillors and central government gave a clear election promise to protect the Green Belt and they have now gone against this which is totally unjustified.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16816  Respondent: 10843585 / Jackie Payne  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Send village being removed from the Green Belt. The Green Belt was meant to be permanent and there are no special circumstances to justify abandoning it. Send's Green belt is a buffer to keep Woking and Guildford merging. Local councillors and central government gave a clear election promise to protect the Green Belt and they have now gone against this which is totally unjustified.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14899  Respondent: 10843905 / G King  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Green Belt – I strongly object to the removal of the Horsleys and other villages in Guildford Borough from the Green Belt.

The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.
This fundamental foundation of the purpose of Green Belt has been ignored by this plan. If the proposals in this plan are carried out then Green Belt will be **irreversibly** removed and a conurbation created from Bookham and Cobham through to Guildford. This is diametric opposite of the Green Belt’s purpose. This plan is predicated on the assumption that it is acceptable to convert Green Belt to housing. This must be the option of last resort, not the starting point.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: PSLPP16/6933  **Respondent:** 10844353 / Julia Wood  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

2) I object to Ripley, Send and Clandon being removed from the Green Belt. This is a lovely area where people from urban areas come for walks and relaxation. Development should be done on brownfield sites like at Burnt Common rather than at Garlick Arch.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: PSLPP16/11944  **Respondent:** 10844545 / Paul Cretney  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

I object to the removal of East and West Horsley from the Green Belt. This would completely change the nature of both villages.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: PSLPP16/10174  **Respondent:** 10844609 / Sam Critchlow  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

I OBJECT to all insetting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/12372</th>
<th>Respondent: 10844993 / Simon Wright</th>
<th>Agent:</th>
</tr>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td>I object to the removal of Send from the Green Belt because the village and its countryside provides a necessary buffer between Woking and Guildford. Any more development in this area would surely constitute urban sprawl.</td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td>Attached documents:</td>
</tr>
</tbody>
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<table>
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<th>Comment ID: pslp171/1821</th>
<th>Respondent: 10844993 / Simon Wright</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td>I object to the proposal to inset Send Business Park from the Green Belt due to the following points:</td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td>Attached documents:</td>
</tr>
<tr>
<td>The roads to this area are rural roads, single track for the most part, certainly not suitable for any more traffic, especially larger commercial vehicles. At one end it joins another rural road with a weak bridge in one direction and a very narrow junction in Ripley in the other.</td>
<td></td>
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<tr>
<td>Any more development in this area ruins the surrounding Green Belt land, which comprises open fields and the River Wey.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The original development is effectively an old non conforming user in an area of outstanding countryside, so shouldn't even be there.</td>
<td></td>
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</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/6381</th>
<th>Respondent: 10845377 / Natasha Lock</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td>So far, no exceptional circumstances have been shown to build on Green belt land.</td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td>Attached documents:</td>
</tr>
<tr>
<td>The Green Belt is there to stop neighbouring towns from merging. To stop the unrestricted growth of built up areas. It enables people/Families from the cities to have easy access to the countryside.</td>
<td></td>
<td></td>
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<tr>
<td>I believe this should be protected for generations to come.</td>
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</table>

<table>
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<tr>
<th>Comment ID: PSLPP16/6388</th>
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<th>Agent:</th>
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<tbody>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td></td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td>Attached documents:</td>
</tr>
</tbody>
</table>
Loss of Green Belt land:

Sadiq Khan, new Mayor of London, has instructed London planners not to approve development on Green Belt Land within the M25. If we continue to build on our countryside it won’t be many decades before we have none left. Creeping development has led to almost continuous housing from Central London to Effingham. Is this to carry on to Guildford and beyond? (1,700 houses are planned for the Guildford end of the Hogs Back and 1,000 new houses on greenfield sites in Normandy.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16299  Respondent: 10845537 / Chloe Moore  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1) all erosion of green belt
2) removal of villages from the green belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/390  Respondent: 10845569 / Stu Edwards  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I live at [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] in Ripley I am Stewart Hornblow My youngest son is [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] and he objects to -

1) all erosion of green belt
2) removal of villages from the green belt
3) disproportionate amount of development in one area of the borough
4) limited consultation period
5) last minute inclusion of new sites with less than 2 weeks to go
6) lack of evidence for housing numbers needed
7) lack of immediate provision needed for new schools
8) lack of any immediate provision for doctors surgery S
9) and development at garlic arch
10) increased traffic that would be cause in which a village such as Ripley already cannot sustain its current demand without long tailback and
11) dangerous size vehicals manoeuvring in roads that has little or no pedestrian path way due to increased traffic
12) lack of parking in the village for the present day users let alone if more were to be housed
13) the use of countryside areas for which the area is so well know to build more properties

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/526</th>
<th>Respondent: 10845569 / Stu Edwards</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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I object to -
1) all erosion of green belt
2) removal of villages from the green belt
3) disproportionate amount of development in one area of the borough
4) limited consultation period
5) last minute inclusion of new sites with less than 2 weeks to go
6) lack of evidence for housing numbers needed
7) lack of immediate provision needed for new schools
8) lack of any immediate provision for doctors surgery S
9) and development at garlic arch
10) increased traffic that would be cause in which a village such as Ripley already cannot sustain its current demand without long tailback and
11) dangerous size vehicals manoeuvring in roads that has little or no pedestrian path way due to increased traffic
12) lack of parking in the village for the present day users let alone if more were to be housed
13) the use of countryside areas for which the area is so well know to build more properties

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1) all erosion of green belt
2) removal of villages from the green belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1005  Respondent: 10846145 / Phillipa Bottomley  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the proposal to inset Send Business Park from the Green Belt because it is in an area of outstanding countryside adjacent to the beautiful Wey Navigation and is an inappropriate development in the Green Belt. The narrow country road system connecting Send Business Park to Send, Ripley and Woking is inadequate and will only be made worse by more development of this site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14508  Respondent: 10846625 / Frank Drennan  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1.1 I object to Policy P2 “green belt” on the grounds that;

1.2 This policy states, “the general extent of the Green Belt has been retained.” This is completely false.

1.3 The policy wording is weak in support of the Metropolitan Green Belt even though the latter forms 89% of the borough and should be the cornerstone of all local planning policy. It is precious beyond the short-term demands of the present Government’s policy or a 15-year local plan. As noted under Policy S1 above, it is a solemn legacy to future generations – an asset and amenity that belongs as much to Londoners and the whole nation as to the people who live in it. It is an inalienable public good. Once gone it is gone forever. It is not the Council’s to give away.

1.4 Policy P2 completely fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it has been around for a long time and it needs to be permanently protected. It was actually established in a local act of parliament in Guildford under the London Home Counties (Green Belt) Act 1938 and subsequently in the 1944 Greater London Plan to contain the outward sprawl of London. The boundaries of the Green Belt through Guildford Borough were later defined in the 1987 Local Plan, forming part of a 19-24km concentric belt around London. The Green Belt is intended to check the unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and other urban land. The principles of the Green Belt designation were outlined within Planning Policy Guidance 2: Green Belts (PPG2) and are found within the National Planning Policy Framework (NPPF). The Metropolitan Green Belt is an exemplar of good planning and the envy of planners throughout the world.
Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. Building on it involves high opportunity costs, including an irreversible loss of: 

- Agricultural production
- Rural leisure and tourism amenities
- Water catchment
- Flood control
- Biodiversity
- Natural heritage
- A carbon sink for air pollution
- Room for public facilities such as parks and burial grounds
- Profitable film locations (e.g. Shere)
- Future economic potential such as mineral extraction (even fracking)
- Natural beauty, landmarks, open space, rural views and sight lines

Benefits to public health and wellbeing, physical and psychological (as well expressed in the NPPF)

As a matter of law and national and local policy, these assets should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultations.

It is quite incorrect to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold.

I object to the “insetting” of 14 villages from the Green Belt, and at “infilling” 12 of the borough’s Green Belt villages. I am deeply disturbed that settlement boundaries are to be hugely extended in many villages and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are “leggy” in outline, reflecting the effect of ribbon development (often along just one side of existing roads) permitted between the Wars. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost hell bent on self-defeat.

This policy is based on a flawed Green Belt and Countryside Study that, according to one Conservative Councillor, was irregularly commissioned by Council officers without the authority of Councillors.

To “inset” two thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, although they would quickly destroy them if the proposed “insetting” and boundary extensions go ahead. This policy is wildly disproportionate in terms of any foreseeable development need (especially post-Brexit) and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.
Send is a good example of villages that should not be removed from the Green Belt. Send provides an important Green Belt buffer between Woking and Guildford. Yes, it is true that Send comprises old ribbon development but this should not mean it can be removed from the Green Belt so that Woking joins up to Guildford. The village and the countryside behind the A247 should all be protected.

- I object to three particularly vulnerable areas of high quality amenity land being taken out of the Green Belt around Send which include:
  - The land behind the schools including playing fields and woodland.
  - The land to the right of Cartbridge by the River Wey Navigation up to the new boundary fence with Vision Engineering.
  - Land to the left of Cartbridge going up to the old depot on the Wey Navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1106  Respondent: 10846625 / Frank Drennan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

I object to the changes to Policy P2 because they have not addressed many of the 32,000 objections made to the 2016 plan.

I object to the new para (1) “The Metropolitan Green Belt will continue to be protected as shown designated on the Policies Map, against inappropriate development. In accordance with national planning policy, the construction of new development will be considered inappropriate and will not be permitted unless very special circumstances can be demonstrated.” The words “as shown designated on the Policies Map” should be deleted. The Policies Map has effectively ignored huge areas of Green Belt protection and the new para (1) is therefore a sham.

I object to the proposed change that Send Business Park should be inset from the Green Belt due to the fact that:
- It is effectively a non-conforming user in an area of beautiful countryside adjacent to the beautiful Wey Navigation
- It has restricted access along Tannery Lane
- It should not be given the opportunity for further expansion or development

Policy P2 still completely fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it has been around for a long time and it needs to be permanently protected. It was actually established in a local act of parliament under the London Home Counties (Green Belt) Act 1938 and subsequently in the 1944 Greater London Plan to contain the outward sprawl of London. The boundaries of the Green Belt through Guildford Borough were later defined in the 1987 Local Plan, forming part of a 19-24 km concentric belt around London. The Green Belt is intended to check the unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and other urban land. The principles of the Green Belt designation were outlined within Planning Policy Guidance 2: Green Belts (PPG2) and are found within the National Planning Policy Framework (NPPF). The Metropolitan Green Belt is an exemplar of good planning and the envy of planners throughout the world.

Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital.
It is quite incorrect to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s
Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included.
More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold.
No-one argues that we should sell 1.6% of the Crown jewels in order to build houses.

I object to the statement in the Draft Local Plan under Green Belt Policy P2 (4.3.13) which claims that Send and a further
list of 13 villages are “now inset from the Green Belt”. This statement is false. GBC is proposing to “inset” these village.
No decision has been made by an Inspector, therefore the villages remain in the Green Belt.

I object to the changed “insetting” of 15 villages (including Ripley) from the Green Belt, and at “infilling” 12 of the
borough’s Green Belt villages. Send is a good example of villages that should not be removed from the Green Belt. Send
provides an important Green Belt buffer between Woking and Guildford. Yes, it is true that Send comprises old ribbon
development but this should not mean it can be removed from the Green Belt so that Woking joins up to Guildford. The
village and the countryside behind the A247 should all be protected.

I object to three particularly vulnerable areas of high quality amenity land being taken out of the Green Belt at Send
which include:

- The land behind the schools including playing fields and woodland.
- The land to the right of Cartbridge by the River Wey Navigation up to the new boundary fence with Vision
  Engineering.
- Land to the left of Cartbridge going up to the old depot on the Wey Navigation.

I object to the inclusion of Send Business Centre/Tannery Studios Tannery Lane, Send in relation to proposed inset from
the Green Belt because:

• It is effectively an old non-conforming user in an area of outstanding countryside
• It is adjacent to the beautiful Wey Navigation
• There is highly restricted vehicular access along Tannery Lane in both directions
• Further expansion or development at this location detracts from the openness of the Green Belt and is
  inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2135  Respondent: 10847521 / Andrew Procter  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

1.1 I object to the changes to Policy P2 because they have not addressed many of the 32,000 objections made to the
2016 plan.

1.2 I object to the new para (1) “The Metropolitan Green Belt will continue to be protected as shown designated on
the Policies Map, against inappropriate development. In accordance with national planning policy, the construction of
new development will be considered inappropriate and will not be permitted unless very special circumstances can be
demonstrated.” The words “as shown designated on the Policies Map” should be deleted. The Policies Map has
effectively ignored huge areas of Green Belt protection and the new para (1) is therefore a sham.

1.3 I object to the proposed change that Send Business Park should be inset from the Green Belt due to the fact that:
1.4 It is effectively a non-conforming user in an area of beautiful countryside adjacent to the beautiful Wey Navigation.

1.5 It has restricted access along Tannery Lane.

1.6 It should not be given the opportunity for further expansion or development.

1.7 Policy P2 **still completely fails** to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it has been around for a long time and it needs to be permanently protected. It was actually established in a local act of parliament in Guildford under the London Home Counties (Green Belt) Act 1938 and subsequently in the 1944 Greater London Plan to contain the outward sprawl of London. The boundaries of the Green Belt through Guildford Borough were later defined in the 1987 Local Plan, forming part of a 19-24km concentric belt around London. The Green Belt is intended to check the unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and other urban land. The principles of the Green Belt designation were outlined within Planning Policy Guidance 2: Green Belts (PPG2) and are found within the National Planning Policy Framework (NPPF). The Metropolitan Green Belt is an exemplar of good planning and the envy of planners throughout the world.

1.8 Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital.

1.9 It is quite incorrect to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold. No-one argues that we should sell 1.6% of the Crown jewels in order to build houses.

1.10 I object to the statement in the Draft Local Plan under Green Belt Policy P2 (4.3.13) which claims that Send and a further list of 13 villages are “**now inset from the Green Belt**”.

1.11 This statement is untrue as GBC is proposing to “inset” these village. No decision has been made by an Inspector, therefore the villages remain in the Green Belt!

1.12 I object to the changed “insetting” of 15 villages (including Ripley) from the Green Belt, and at “infilling” 12 of the borough’s Green Belt villages.

1.13 I am deeply disturbed that settlement boundaries are to be hugely extended in many villages (particularly at Send) and that infilling is also proposed outside the settlement boundaries of 11 further villages. This is completely unplanned and unmeasured development outside of the OAN.

1.14 Many Guildford villages are “leggy” in outline, reflecting the effect of ribbon development (often along just one side of existing roads) permitted between the Wars. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost hell bent on self-defeat.

1.15 Send is a good example of villages that **should not be removed** from the Green Belt. Send provides an important Green Belt buffer between Woking and Guildford. Yes, it is true that Send comprises old ribbon development but this should not mean it can be removed from the Green Belt so that Woking joins up to Guildford. The village and the countryside behind the A247 should all be protected.

1.16 I object to three particularly vulnerable areas of high quality amenity land being taken out of the Green Belt at Send which include:

1.17 The land behind the schools including playing fields and woodland.

1.18 The land to the right of Cartbridge by the River Wey Navigation up to the new boundary fence with Vision Engineering.
1.19  Land to the left of Cartbridge going up to the old depot on the Wey Navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1771  Respondent: 10848513 / Martin Cole  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

2. I object to not protecting the Green Belt

I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield and Garlick’s Arch and the subsequent urban sprawl. The whole beauty and character of the area are the individual villages. There are no exceptional circumstances for these villages being removed, as required by the National Planning Policy.

There is a suitable brownfield site at Burnt Common that should be developed rather than developing Garlick’s Arch.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/806  Respondent: 10848705 / John Woodcock  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to all erosion of the Green Belt. It is essential that we contain urban sprawl and there is plenty of evidence that we have considerable ‘brownfield’ land on which to build.

2. I object to any “in-setting” of any villages from the Green Belt, mostly for the same reasons as above, but also because any proposed development should be tested very vigorously against the character of the area and the absolute necessity to keep green spaces between our towns and villages; they preserve quality of life and provide an essential eco-system which promotes peoples’ health and welfare

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9427  Respondent: 10848929 / Mark Grainger  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to policy P2 (green belt)

This is an extremely important asset to the public and goes against protecting it. The impact on flooding, natural resources, wildlife, leisure and health has been ignored.
There appears to be an unreasonable amount of development proposed for the green belt in areas of west and east horsley, which in my opinion will do more harm than good.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/408</th>
<th>Respondent: 10849377 / Vickie Leonard</th>
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<td>( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>I would like to strongly object to the 2016 draft local plan. I live in Ripley High street and over the last 4 years have already seen allot of change to what was a lovely village and this has already gone downhill with all the permitted development and the local plan will only make matters worse in my eyes.</td>
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<td>I would like to object to many points as follows:</td>
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<td>I object to all erosion of the greenbelt</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<th>Comment ID: PSLPP16/409</th>
<th>Respondent: 10849377 / Vickie Leonard</th>
<th>Agent:</th>
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<td>I object to any in-setting, removal of any villages from the Green Belt, that’s what we have brought into and should remain in</td>
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<th>Comment ID: PSLPP16/1570</th>
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<td>( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>I am writing to object to the proposed use of Green Belt for future development. It is essential that the green belt is protected as it provides the separation of towns and maintains the beauty and rural nature of our county.</td>
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<td>It has long been the policy to use any &quot;brown-field&quot; sites as the basis for any development, of which there are plenty. These sites must be exhausted before green belt land could even be mentioned, thus opening the flood gates for massive development of any green belt land, causing towns like Guildford and Woking to be joined.</td>
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I do not understand why the council is considering this green-belt development, this will ruin the individual nature of the villages and cause them to become urbanised.

I therefore strongly object to the 2016 Draft Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7836  Respondent: 10849665 / Vivien Tully  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I wrote to you on 30-6-2016 outlining my objections to any green belt development within the Guildford borough council area.

I object to any “in setting” (removal) of any villages from the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2284  Respondent: 10850433 / Gwyn Griffiths  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( No )

National planning policy requires exceptional circumstances to persist for green belt boundaries to be amended. these have not been shown, save for a generic belief that green belt needs to be changed to enable further development in the borough. In most cases there is no justification for boundary changes or insetting, and the Council has erred in its evaluation.

In particular, I refer to Effingham. The planning document states that the village does not contribute to the openness of the green belt and should therefore be inset. This is not supported by evidence, and there are no exceptional circumstances to justify the insetting of the village. In a recent planning inquiry (public inquiry in 2013 relating to land in Church Street, Effingham) Guildford Borough Council argued, and the Inspector held, that the proposed development damaged the openness of the green belt. The same was held in respect of a planning appeal in Effingham Place. Accordingly, on the basis of this evidence, it is clear that the council's assessment is flawed, and Effingham should not be inset.

I have not examined all the circumstances of the villages proposed to be inset, but I contend that the council has failed to demonstrate that in each case exceptional circumstances exist, and/or that they do not contribute to the openness of the Green Belt, and/or that insetting is justified under that National framework.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2285  Respondent: 10850433 / Gwyn Griffiths  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
The plan proposes a significant development of Green Belt land at the disused Wisley Airfield. I object to the proposed development on the basis that it is inappropriate development in the green belt and is unsustainable.

The council has failed to show that it is necessary to develop the Wisley Airfield, contributing to urbanisation sprawl along the A3 in Surrey, destroying the openness of the green belt.

The proposals will destroy the rural nature of local villages, Ockham in particular, but extending to Ripley, East and West Horsley, Cobham and Effingham. It will increase loads on local infrastructure which is already at breaking point: local roads and rail transportation will be overloaded, local schools will have to be enlarged thereby further damaging other sensitive villages and sites in the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I strongly object to the Horsleys being removed from the Green Belt. This is a beautiful area which is peaceful and friendly, although in recent years the traffic through the village has become a problem and localised flooding is becoming worse. The more housing that is built, water has nowhere to go. It seems that GBC has taken little notice of the concerns of residents who are totally aware of the problems we will face if all these houses are built. As mentioned before, for every house built, we can expect two extra cars on our roads. What are you thinking?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Extension of the boundaries of the East and West Horsley settlement area: There is no reasoning provided for these proposed changes and the East and West Horsley village areas inside these boundaries must not be removed from Green Belt protection.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
As a resident of West Horsley I wish to register objections to the new Local Plan as follows:

The purpose of green belt is to protect against urban sprawl and retain the character of rural communities like ours. The removal of green belt status and addition of large numbers of houses in the Horsleys would completely change the look and feel of our villages.

The National Planning Policy Framework (NPPF) requires any change of Green Belt boundaries to demonstrate exceptional circumstances. Exceptional circumstances for removing the Horsleys from the Green Belt have NOT been demonstrated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4264  Respondent: 10851585 / Mike Coope-Mitchell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The proposal to remove East and West Horsley villages from the green belt is hard to understand. It goes in the face of the successful protection which the green belt has given over decades. On principle it should be retained for the benefit of future generations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/45  Respondent: 10852161 / Andrea McGeachin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I find myself having to object again to things the council are trying to put through when precious objections were made.

I object to the following areas of the draft plan.

1. The erosion of the local Green Belt and what is called "in-setting" of any villages from the Green Belt. I live in Ripley, and am objecting to the plan to take Ripley, Send and Clandon out of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7835  Respondent: 10852289 / Barry Scott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the removal of Send from the Green belt because the village and countryside provide a necessary buffer between Guildford and Woking and there are no special circumstances that can be justified for building on the Greenbelt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Green Belt, Policy 2 at paragraph 4.3.15</td>
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<td>I object to the proposal to inset Send Business Park from the Green Belt because:</td>
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<td>• There is highly restricted vehicular access along Tannery Lane in both directions</td>
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<td>• Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate</td>
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<td>Re: Local Plan, Guildford</td>
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<td>I object to Send Village being removed from the Green Belt. I understand that the Green Belt was intended to be permanent and I don’t see special circumstances to justify abandoning it.</td>
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<th>Comment ID: PSLPP16/9801  Respondent: 10853249 / Evan Parry-Morris  Agent:</th>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Green belt is not being protected</td>
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<td>There are no special circumstances for the removal of green belt. I object to the proposals for the removal of Send, Ripley and Clandon from green belt. Once taken, the green belt is forever lost</td>
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1. POLICY P2. SEND SHOULD NOT BE REMOVED FROM THE GREEN BELT. I strongly object to the removal of the buffer that Send provides between Woking and Guildford. The particularly vulnerable areas of land being taken out of the Green Belt include 1. The land behind the school including playing fields and woodland. 2. The land to the right of Cartbridge by the River Wey Navigation up to the new boundary fence with Vision Engineering. 3. Land to the left of Cartbridge going up to the old depot on the Wey Navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8494  Respondent: 10853857 / Norman Kidd  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY P2. SEND SHOULD NOT BE REMOVED FROM THE GREEN BELT. I strongly object to the removal of the buffer that Send provides between Woking and Guildford. The particularly vulnerable areas of land being taken out of the Green Belt include 1. The land behind the school including playing fields and woodland. 2. The land to the right of Cartbridge by the River Wey Navigation up to the new boundary fence with Vision Engineering. 3. Land to the left of Cartbridge going up to the old depot on the Wey Navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7171  Respondent: 10854113 / Sarah Pickering  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

WE OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage.
The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition WE OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.
There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/655  Respondent: 10854241 / Sian Holwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Firstly please confirm receipt of this objection to the proposed Local Plan. As a long standing resident of Send under no circumstances should the Green Belt be encroached by any proposed development. The Green Belt provides local residents with a certain quality of life...that is what I have paid for in the cost of my house and I am not prepared for Guildford Borough Council to take that away from me.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2605  Respondent: 10855393 / Adrian Juste  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

RE: SEND VILLAGE. GREEN BELT INCURSION

It must be wonderful to be a property developer - sitting there with nothing to do except vandalise the Surrey countryside, eagerly perusing your commissioned aerial photographs, greedily peering at open spaces and green bits - totally oblivious to the wonderful fecundity, streams, woodlands and healthy abundance of wildlife there.

The developer sees none of this - just 'business opportunities' where a couple more houses and yet another Tesco Express could be squeezed in ... no conscience, no altruism ... just greed.

In the odd moment of benevolence they salve their consciences by proclaiming they create jobs and provide much-needed housing - which translates to jobs for 3 months and houses that no ordinary person could afford.

A property developer's standing on the social pariah scale is now alongside that of the average MP.

I know quite a few developers .. most of whom are boring, soulless individuals you'd pray you're never stuck in a lift with.
And so here we go again: the annual battle with Guildford Council and their mates - the whittling away of the Green Belt - which was created for a purpose, by people gifted with more wisdom and foresight than the elected guardians we're blessed with now.

I do appreciate your problems on the Council: It can't be easy with the government pouring people into the South East year on year. They care little - after all, many of its members will have their fat pensions and a couple of 'consultancies' to fall back on, leaving some other poor sap to try to sort out the mess they've made.

Viewing your list of proposals on this new Local Plan is very depressing:

Light industry? Travellers Sites? Housing Estates? ..

Are you mad??! You hope to push these proposals through with little or no added infrastructure? Oh, please!

The proposed Garlick's Arch and Tannery Lane developments are of particular concern to me.

What your plans should involve is building roads and services for the villages & communities we have now, not piling yet more straws onto the enervated camel's back.

Thanks to much-vaunted 'Austerity' our infrastructure is grinding to a halt: roads can't be maintained, paths and road signs are completely overgrown, making getting about more of an ordeal with every week that passes.

And I wonder if any of you actually ever venture onto the M25's J 10 via the A3? If you value your life, probably not - it is now increasingly dangerous. Or maybe try to head down the A3 past Guildford? Um, excuse me: WE CAN'T COPE NOW!

It's no use you hoping against hope that the traffic fairy will come along, wave her wand and for your problems to disappear ..

They won't.

Mid Surrey is not some gigantic Monopoly board with bits to be cherry-picked and flogged off to make a fortune - No, it's an example of England at its finest. But won't be if you get your way.

Speaking as one who's rapidly grown to love the place and its inhabitants, it's all too apparent that the good residents of Send and its environs are up in arms and ready to do battle with this intended vandalism ... and frankly, who can blame them?

The developers, who obviously consider themselves 'Oh so clever’ have the resources to pay people to keep their applications coming, then revised application compounding revised application, confident that sooner or later we Plebs will get bored of protesting, thus clearing the way for their ugly, cash-rich developments.

Think again .. We won't
Please add my name to the growing list of objectors..

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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As recently as last month it was all going so well for the Tories set fair for a thumping Parliamentary majority around the seventy mark, to provide a rock-solid mandate to do whatever they liked for the next five years. But of course fate decreed otherwise; the PM, along with her equally out-of-touch advisers, crushed that dream in 10 minutes flat by alienating millions of core voters.

However, it seems this same detached thinking continues outside Central government - the regions, especially the moneyed ones, still think they can carry on as though the promised landslide had actually happened. It must be wonderful to be a property developer - sitting there with nothing to do except vandalise the Surrey countryside, eagerly perusing your commissioned aerial photographs, greedily peering at open spaces and green bits - totally oblivious to the wonderful fecundity, streams, woodlands and healthy abundance of wildlife there.

The developer sees none of this - just 'business opportunities' where dozens more houses and yet another Tesco Express can be squeezed in ... no conscience, no altruism ... just flat out greed. In the odd moment of munificence they salve their conscience by proclaiming they create jobs and provide much-needed housing - which translates to jobs for 3 months and houses no ordinary person could ever afford. A property developer's standing on the social pariah scale is now alongside that of your average MP. I know quite a few developers, most of whom are boring, soulless individuals you'd pray you're never stuck in a lift with.

And so, here we go again: the annual battle with you on Guildford Council and your select band of friends, and the whittling away of the Green Belt - which was created for a purpose, by people gifted with more wisdom and foresight than the elected guardians we're blessed with now. I do appreciate your problems on the Council: It can't be easy with government pouring people into the South East year on year They care little - after all, many of its MPs will have their fat pensions and a couple of 'consultancies' to fall back on, leaving some other poor sap to try to sort out the mess they've made.

Viewing your list of proposals on this new Local Plan is very depressing:

The proposed Garlick's Arch and Tannery Lane developments are of particular concern to me. You'd proceed with little or no added infrastructure?! Oh, please! What your plans should include is building roads and services for the villages & communities we have now, not piling yet more straws onto the weary camel's back. Thanks to much-vaunted 'Austerity' (that went well, didn't it?) our infrastructure is grinding to a halt: roads can't be maintained, and paths and road signs completely overgrown, Don't you realise? - WE CAN'T COPE NOW! Or perhaps you just don't care ... even more unforgivable. It's no use you hoping against hope that the traffic fairy will come along, wave her wand - and all your problems will disappear .. They won't.

Mid Surrey is not some gigantic Monopoly board with bits to be cherry-picked and flogged off to your mates to make a fortune - No, it's an example of England at its finest. But won't be if you get your way. Some of your speculator friends, ready to swoop like the greedy vultures they are, don't even know where Guildford is some of them probably aren't too sure where England is - so why should they care what happens to this lovely corner of it? Speaking as one who's rapidly grown to love the area and its denizens, it's all too apparent that the good residents of Send and its environs are up in arms and ready to do battle with this wilful and studied vandalism and frankly, who can blame them? The developers, who obviously consider themselves oh-so-clever, have the resources to pay people to keep their applications coming, then revised application compounding revised application, confident that sooner or later we Plebs will get bored of protesting, thus clearing the way to sneak through their ugly, cash-rich developments.
Think again We won't
Please add my name to the long list of objectors..

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2166  Respondent: 10855553 / Emma Tallick  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

2. I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

The Plan should develop the existing brownfield site at Burnt Common rather than developing Garlick’s Arch (A43).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/622  Respondent: 10855777 / Ian Gray  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- I object to the building on green belt land altogether (this is against Government stated commitments for Green Belt protection)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/11222  Respondent: 10856353 / David Howells  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- P2 Impact on the Green Belt; this is a protected area which affects the quality of life for everyone in the borough. It should not be subject to the vagaries of planning and cast aside after decades of preserving our green and open spaces. Better town centre and brownfield site development opportunities exist and should be built out before any impact on the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/3034  Respondent: 10856385 / Alex Ayscough  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I would like to object to the removal of Chilworth and Shalford from the green belt for the following reasons:

1. It goes against the Fundamental aim of green belt policy i.e. that is to prevent urban sprawl
2. The transport links are inadequate to cater for the proposed developments.
3. The proposed developments around Old Manor Lane would increase the rate of run-off and the likelyhood of further flooding downstream.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/249  Respondent: 10856513 / Janet Kidd  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY P2. SEND SHOULD NOT BE REMOVED FROM THE GREEN BELT. Send provides a buffer between Woking and Guildford and I object to the particularly vulnerable areas of land being taken out of the Green Belt which include 1. The land behind the school including playing fields and woodland. 2. The land to the right of Cartbridge by the River Wey Navigation up to the new boundary fence with Vision Engineering. 3. Land to the left of Cartbridge going up to the old depot on the Wey Navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8347  Respondent: 10856513 / Janet Kidd  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

SEND SHOULD NOT BE REMOVED FROM THE GREEN BELT.

Send provides buffer between Woking and Guildford and I object to the particularly vulnerable areas of land being taken out of the Green Belt which include 1. The land behind the school including playing fields and woodland. 2. The land to the right of Cartbridge by the River Wey Navigation up to the new boundary fence with Vision Engineering. 3. Land to the left of Cartbridge going up to the old depot on the Wey Navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
| Comment ID: PSLPP16/17415 | Respondent: 10856801 / Jennifer Tigwell | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| I OBJECT to Send Village being removed from the Green belt. |
| By so doing would have a detrimental effect on the surrounding area(s) allowing developers a "free for all " approach to extend/develop beyond what is required/needed for the area. |
| We need to maintain a Green Belt buffer zone between Send & Woking. |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |

| Comment ID: PSLPP16/14642 | Respondent: 10857249 / Alice Pashley | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| I OBJECT to not protecting the Green Belt (Policy P2) |
| This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development. |
| The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt. |
| Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done. |
| The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites |
than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of “About Guildford” (published by the Council) on page 5 states that “... the Plan rejects any schemes that would have a detrimental impact on the Green Belt.” This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy P2: Green Belt

I OBJECT to this policy.

This ignores the Green Belt as a constraint as set out in the NPPF and has weakened the interpretation of exceptional circumstances.

Villages should continue to be washed over by the Green Belt in order to preserve their integrity and character.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1722  Respondent: 10857889 / William Kyte OBE  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The new paragraph (1) effectively destroys the concept of Green Belt permanence.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3812  Respondent: 10858273 / S.M Southall  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Stated Government policy is that areas should only be taken out of the Green Belt in exceptional circumstances and you have not demonstrated that those circumstances apply in the case of the Horsleys. It is accepted that on your planning watch you have permitted some infill development in the main East Horsley village, but south of the A246 there have been no extra dwellings in decades. Indeed, you have previously advised me that the Warren and Rowbarns Way are in an Area of Outstanding Natural Beauty - i.e. the Surrey Hills. In the circumstances, how can you possibly permit a re-designation from AONB status to a planning free-for-all; that would be an act of quite inexcusable planning vandalism?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12840  Respondent: 10858401 / Philip Kite  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Ripley IS in the green belt and should stay there….. Cannot see me voting Tory at next local elections…

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/660  Respondent: 10858657 / Fiona Gray  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I wish to lodge my objection to the 2016 local plan for Guildford,

The Green Belt was put in place to

• To check the unrestricted sprawl of large built-up areas;
• To prevent neighbouring towns merging into one another;
• To assist in safeguarding the countryside from encroachment;
• To preserve the setting and special character of historic towns; and
• To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
• I cannot understand how the draft local plan abides by what the Green belt is meant to be and so I strongly object to what is being proposed
• I object to the building on green belt land altogether (this is against Government stated commitments for Green Belt protection)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11654  Respondent: 10858753 / Carole Warren  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the local plan as it does not protect the green belt.

Multiple villages and their surrounding areas will be removed from the green belt, resulting in urban sprawl.

Villages will lose their identities as a result of their sprawl. Ancient Woodland will be destroyed, wildlife will be impacted due to the loss of their natural habitat.

For instance at the site of Waterloo Farm there are regular sightings of Deer, Peacocks and Rabbits along with a variety of birds.

The plan should concentrate solely on brownfield sites, leaving the current green belt intact.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18592  Respondent: 10858977 / Angela Otterson  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**I object to Policy P2 green belt**

This policy states, “the general extent of the Green Belt has been retained.” This is completely false.

The policy wording is weak in support of the Metropolitan Green Belt even though the latter forms 89% of the borough and should be the cornerstone of all local planning policy. It is precious beyond the short-term demands of the present Government’s policy or a 15-year local plan. As noted under Policy S1 above, it is a solemn legacy to future generations – an asset and amenity that belongs as much to Londoners and the whole nation as to the people who live in it. It is an inalienable public good. Once gone it is gone forever. It is not the Council’s to give away.

Policy P2 completely fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it has been around for a long time and it needs to be permanently protected. It was actually established in a local act of parliament in Guildford under the London Home Counties (Green Belt) Act 1938 and subsequently in the 1944 Greater London Plan to contain the outward sprawl of London. The boundaries of the Green Belt through Guildford Borough were later defined in the 1987 Local Plan, forming part of a 19-24km concentric belt around London. The Green Belt is intended to check the unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and other urban land. The principles of the Green Belt designation were outlined within Planning Policy Guidance 2: Green Belts (PPG2) and are found within the National Planning Policy Framework (NPPF). The Metropolitan Green Belt is an exemplar of good planning and the envy of planners throughout the world.

Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. Building on it involves high opportunity costs, including an irreversible loss of:

- Agricultural production
- Rural leisure and tourism amenities
- Water catchment
- Flood control
- Biodiversity
- Natural heritage
- A carbon sink for air pollution
- Room for public facilities such as parks and burial grounds
- Profitable film locations (e.g. Shere)
- Future economic potential such as mineral extraction (even fracking)
- Natural beauty, landmarks, open space, rural views and sight lines
- Benefits to public health and well being, physical and psychological (as well expressed in the NPPF)

As a matter of law and national and local policy, these assets should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultations.

It is quite incorrect to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included.
More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold. No-one argues that we should sell 1.6% of the Crown jewels in order to build houses.

I object to the “insetting” of 14 villages from the Green Belt, and at “infilling” 12 of the borough’s Green Belt villages. I am deeply disturbed that settlement boundaries are to be hugely extended in many villages and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are “leggy” in outline, reflecting the effect of ribbon development (often along just one side of existing roads) permitted between the Wars. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost hell bent on self-defeat.

I believe this policy is based on a flawed Green Belt and Countryside Study that, according to one Conservative Councillor, was irregularly commissioned by Council officers without the authority of Councillors.

To “inset” two thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, although they would quickly destroy them if the proposed “insetting” and boundary extensions go ahead. This policy is wildly disproportionate in terms of any foreseeable development need (especially post-Brexit) and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Send is a good example of villages that should not be removed from the Green Belt. Send provides an important Green Belt buffer between Woking and Guildford. Yes, it is true that Send comprises old ribbon development but this should not mean it can be removed from the Green Belt so that Woking joins up to Guildford. The village and the countryside behind the A247 should all be protected.

I object to three particularly vulnerable areas of high quality amenity land being taken out of the Green Belt around Send which include:

1. The land behind the schools including playing fields and woodland.
2. The land to the right of Cartbridge by the River Wey Navigation up to the new boundary fence with Vision Engineering.
3. Land to the left of Cartbridge going up to the old depot on the Wey Navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/1513</th>
<th>Respondent: 10859265 / Neil Haxton</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
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I object to the proposal to inset Send Business Park from the Green Belt because:

- This is an old non-conforming user in an area of outstanding countryside next to the beautiful Wey Navigation
- There is highly restricted vehicle access along Tannery Lane in both directions that would not accommodate any increase in volume or type of traffic
- Any increased expansion or development at this site detracts from the Green Belt and is completely inappropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/5732</th>
<th>Respondent: 10859489 / Jennifer Procter</th>
<th>Agent:</th>
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<tr>
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GREENBELT AND BROWNFIELD

I object to the the fact that 70% of the building proposed in this Local Plan is in the Greenbelt and strung along the A3 where it will not only remove valuable countryside forever but will destroy the openness of the Greenbelt and effectively join up town and villages as well as creating impossible traffic congestion on the A3 and local roads.

I object the relatively small amount of development for Guildford Town center and the complete failure of GBC to identify and promote sufficient brownfield sites within the urban area, where much more is possible. It almost completely ignores the proviso of 'brownfield first'. Walnut Tree Close, which represents a very real opportunity for housing provision has mysteriously become 'high flood risk' in this plan despite the fact that it is already built upon and new buildings continue to be constructed there. There are many ways to mitigate flood risk. It is interesting that this risk does not seem to be a bar to proposed rural sites, which flood regularly.

I object to GBC using taxpayer's money to buy consultancy, which continually fails to meet their objectives. The station development, another big opportunity for housing is constrained by very precise size and height requirements, which make it difficult for imaginative planning to apply. More imaginative approaches to the issues could achieve better results.

The concentration on retail in the town centre is a further restriction on housing provision. Guildford has adequate retail provision and there is no big demand for more. Retail is less and less needed as so much shopping is now done on line and this trend will continue. If Guildford wants more retail it would be wise to provide housing first and the demand for retail would follow. As it is, pushing development into the countryside will hugely increase external traffic coming to the centre and exacerbate the already congested access problems. Under this circumstance alone retail is likely to fail.

I object to the fact that this plan will fail to deliver anywhere near enough 'affordable housing' despite the promotional exercise on the GBC website where key workers talk of the benefits of the plan. This sort of PR, again at tax payers
expense, is highly misleading. The lack of building in the town centre where key workers are most needed and access to work and public transport is available is an indictment of the intent. Guildford Borough is a commuting area and over building in the countryside will only create more commuters. Moreover this housing will not be 'affordable'. These will be executive homes and will be expensive.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9765  Respondent: 10859489 / Jennifer Procter  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

SEND

I object to all the proposals for development in Send on the grounds that none were included in the 2014 draft Local Plan and that these fundamental changes and last minute inclusions have not undergone proper consultation.

I object to the removal of Send and other villages from the Greenbelt. Send specifically and in conjunction with development at Gosden Hill is in the front line as a link village between Guildford and Woking. This plan to infill Greenbelt land will effectively join up the towns thus creating exactly the type of urban sprawl the Greenbelt was created to avoid.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9771  Respondent: 10859489 / Jennifer Procter  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

DEVELOPMENTS AT WISLEY, GOSDEN HILL AND BLACKWELL FARM

I object to the proposed developments for 2,000 homes at Wisley,

I object to the proposed development of 2,000 homes at Gosden Hill

I object to the development of 1,850 homes at Blackwell Farm.

These numbers are excessive. If allowed to proceed these developments will destroy Greenbelt and farmland and encroach on AONB's and SSCI's and make a mockery of Greenbelt legislation and pledges from Conservative ministers and councillors that they will 'protect the Greenbelt'.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1947  Respondent: 10859489 / Jennifer Procter  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
<table>
<thead>
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<tbody>
<tr>
<td><strong>1 POLICY P2 GREEN BELT</strong></td>
</tr>
<tr>
<td><strong>1.1 I object</strong> to the changes to <strong>Policy P2</strong> because they have not addressed many of the 32,000 objections made to the 2016 plan.</td>
</tr>
<tr>
<td><strong>1.2 I object</strong> to the new para (1) “The Metropolitan Green Belt will continue to be protected as shown designated on the Policies Map, against inappropriate development. In accordance with national planning policy, the construction of new development will be considered inappropriate and will not be permitted unless very special circumstances can be demonstrated.” The words “as shown designated on the Policies Map” should be deleted. The Policies Map has effectively ignored huge areas of Green Belt protection and the new para (1) is therefore a sham.</td>
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<tr>
<td><strong>1.3 I object</strong> to the proposed change that <strong>Send Business Park</strong> should be inset from the Green Belt due to the fact that:</td>
</tr>
<tr>
<td><strong>1.4</strong> It is effectively a non-conforming user in an area of beautiful countryside adjacent to the beautiful Wey Navigation</td>
</tr>
<tr>
<td><strong>1.5</strong> It has restricted access along Tannery Lane</td>
</tr>
<tr>
<td><strong>1.6</strong> It should not be given the opportunity for further expansion or development</td>
</tr>
<tr>
<td><strong>1.7</strong> Policy P2 still completely fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it has been around for a long time and it needs to be permanently protected. It was actually established in a local act of parliament in Guildford under the London Home Counties (Green Belt) Act 1938 and subsequently in the 1944 Greater London Plan to contain the outward sprawl of London. The boundaries of the Green Belt through Guildford Borough were later defined in the 1987 Local Plan, forming part of a 19-24km concentric belt around London. The Green Belt is intended to check the unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and other urban land. The principles of the Green Belt designation were outlined within Planning Policy Guidance 2: Green Belts (PPG2) and are found within the National Planning Policy Framework (NPPF). The Metropolitan Green Belt is an exemplar of good planning and the envy of planners throughout the world.</td>
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<td><strong>1.8</strong> Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital.</td>
</tr>
<tr>
<td><strong>1.9</strong> It is quite incorrect to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold. No-one argues that we should sell 1.6% of the Crown jewels in order to build houses.</td>
</tr>
<tr>
<td><strong>1.10 I object</strong> to the statement in the Draft Local Plan under Green Belt Policy P2 (4.3.13) which claims that Send and a further list of 13 villages are “now inset from the Green Belt”.</td>
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<tr>
<td><strong>1.11</strong> This statement is untrue as GBC is proposing to “inset” these village. No decision has been made by an Inspector, therefore the villages remain in the Green Belt!</td>
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<tr>
<td><strong>1.12 I object</strong> to the changed “insetting” of 15 villages (including Ripley) from the Green Belt, and at “infilling” 12 of the borough’s Green Belt villages.</td>
</tr>
<tr>
<td><strong>1.13</strong> I am deeply disturbed that settlement boundaries are to be hugely extended in many villages (particularly at Send) and that infilling is also proposed outside the settlement boundaries of 11 further villages. This is completely unplanned and unmeasured development outside of the OAN.</td>
</tr>
<tr>
<td><strong>1.14</strong> Many Guildford villages are “leggy” in outline, reflecting the effect of ribbon development (often along just one side of existing roads) permitted between the Wars. It is all too easy to square off boundaries by including countryside</td>
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Section page number 679 of 1782  
Document page number 680
bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the
Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including
the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable
to large blocks of new development and seems almost hell bent on self-defeat.

1.15 Send is a good example of villages that should not be removed from the Green Belt. Send provides an important
Green Belt buffer between Woking and Guildford. Yes, it is true that Send comprises old ribbon development but this
should not mean it can be removed from the Green Belt so that Woking joins up to Guildford. The village and the
countryside behind the A247 should all be protected.

1.16 I object to three particularly vulnerable areas of high quality amenity land being taken out of the Green Belt at Send
which include:

1.17 The land behind the schools including playing fields and woodland.

1.18 The land to the right of Cartbridge by the River Wey Navigation up to the new boundary fence with Vision
Engineering.

1.19 Land to the left of Cartbridge going up to the old depot on the Wey Navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16008  Respondent: 10859553 / MARK Curtis  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

THE NEED TO APPLY CONSTRAINTS

Ministerial guidance in relation to building on the Green Belt is clear:

1. “the single issue of unmet need - is unlikely to outweigh the harm to the Green Belt and other harm to constitute the
“very special circumstances” justifying inappropriate development in the Green Belt” - Nick Boles to Sir Paul Beresford
MP 7th February 2014.

2. “we were always very clear that we would maintain key protections for the countryside, and, in particular, for the
Green Belt. The Framework makes it clear that a Green Belt boundary may be altered only in exceptional circumstances
and reiterates the importance and permanence of the Green Belt” – Nick Boles to Sir Michael Pitt, Planning Inspectorate
3rd March 2014.

3. “Planning Guidance, updated in March 2014, also states that unmet housing need is unlikely to outweigh the harm to
the Green Belt to constitute the very special circumstances justifying inappropriate development within the Green Belt” –
Nick Boles to Sir Paul Beresford MP 18th June 2014

70% of the sites put forward in the Local Plan are in the Green Belt which flies in the face of current government
planning policy. The National Planning Policy Framework (NPPF), National Planning Policy Guidance and case law
make it clear that Green Belt is an absolute constraint on housing supply. Exceptional circumstances need to be shown to
adjust boundaries.

Other constraints under the NPPF include assessments of sustainability, strategic flood risk assessment, physical
constraints on land use and infrastructure constraints (this can include road congestion, schools, drains, power supply and
medical requirements).
Constraints should be applied to the Objectively Assessed Housing Need (OAN). However this itself is overstated and should be reduced from 693 per annum to 500.

In view of the comments above it would appear logical to apply CONSTRAINTS in line with government policy to a corrected OAN of approximately 50% to account for the fact that 89% of the borough is in the permanent Green Belt and development is not supported by adequate major infrastructure. This reduction is in line with the constraints percentage of 50% applied by Woking Borough Council.

This would result in a more acceptable and practically achievable HOUSING TARGET of 250 homes per annum which over a 20-year period would be 5,000 homes. All of these homes could be built in the existing urban brownfield areas of the borough and would in part satisfy the 20,000 objections made by residents to the 2014 draft plan and also relieve the additional problems of inadequate infrastructure.

It would also mean that there is currently 8.5 years supply of housing (2131/250) which is made up of existing permissions granted (1,518) and completions made (613) during 2013/2015. (Monitoring Report by GBC 2015)

The Brexit vote may have strengthened government policy further. Theresa May, the new prime minister, announced on 11 July that she is personally committed to protecting the Green Belt once she takes office.

Whilst I have many significant objections to the GBC Local Plan I applaud the policy statement by GBC in their Monitoring Report, “We will continue to monitor the use of previously developed land, and continue to identify as many opportunities as possible for redevelopment of previously developed land.” I believe it will be to the benefit of all residents if GBC can apply themselves vigorously to this endeavour in order to protect the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16013  
Respondent: 10859553 / MARK Curtis  
Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY P2 GREEN BELT

I object to Policy P2 green belt

This policy states, “the general extent of the Green Belt has been retained.” This is a misleading statement.

The policy wording is weak in support of the Metropolitan Green Belt even though the latter forms 89% of the borough and should be the cornerstone of all local planning policy. It is precious beyond the short-term demands of the present Government’s policy or a 15-year local plan. As noted under Policy S1 above, it is a solemn legacy to future generations – an asset and amenity that belongs as much to Londoners and the whole nation as to the people who live in it. Once gone it is gone forever. It is not the Council’s to give away.

Policy P2 completely fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it has been around for a long time and it needs to be permanently protected. It was actually established in a local act of parliament in Guildford under the London Home Counties (Green Belt) Act 1938 and subsequently in the 1944 Greater London Plan to contain the outward sprawl of London. The boundaries of the Green Belt through Guildford Borough were later defined in the 1987 Local Plan, forming part of a 19-24km concentric belt around London. The Green Belt is intended to check the unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and other urban land. The principles of the Green Belt designation were outlined within Planning Policy Guidance 2: Green Belts (PPG2) and are found within the National Planning Policy Framework (NPPF). The Metropolitan Green Belt is an exemplar of good planning and the envy of planners throughout the world.
Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. Building on it involves high opportunity costs, including an irreversible loss of:

1. Agricultural production
2. Rural leisure and tourism amenities
3. Water catchment
4. Flood control
5. Biodiversity
6. Natural heritage
7. A carbon sink for air pollution
8. Room for public facilities such as parks and burial grounds
9. Profitable film locations (e.g. Shere)
10. Future economic potential such as mineral extraction (even fracking)
11. Natural beauty, landmarks, open space, rural views and sight lines
12. Benefits to public health and wellbeing, physical and psychological (as well expressed in the NPPF)

As a matter of law and national and local policy, these assets should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultations.

It is quite incorrect to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold.

I object to the “insetting” of 14 villages from the Green Belt. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost hell bent on self-defeat.

I believe this policy is based on a flawed Green Belt and Countryside Study that, according to one Conservative Councillor, was irregularly commissioned by Council officers without the authority of Councillors.

To “inset” two thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, although they would quickly destroy them if the proposed “insetting” and boundary extensions go ahead.

I object to the removal of over 400 hectares of Green Belt land in and around Blackwell Farm to facilitate further development of Surrey Research Park and for 1800 homes. Over 60 hectares were removed from Green Belt 12 years ago for the same developer (Surrey University) who has yet to fulfill their planning obligations. This valuable land has been squandered with over 17 acres of surface car parking and as one of the key features of Green belt is its 'permanence' this second request for yet more Green Belt land to be released in such a short space of time, with all the outstanding issues that remain makes this all the more objectionable.

Furthermore I object on grounds of the impact this development will have in terms of congestion on our highways, these issues have been highlighted under ‘infrastructure’.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<tr>
<th>Comment ID: PSLPP16/3581</th>
<th>Respondent: 10859585 / Irene Grainger</th>
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<tr>
<td>I object to the proposal in the local plan on the grounds that Send is in green belt.</td>
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<td>Green Belt, Policy 2 at paragraph 4.3.15.</td>
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<tr>
<td>I object to the proposal to inset Send Business Park from the Green Belt because:</td>
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<td>It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation</td>
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<td>There is highly restricted vehicular access along Tannery Lane in both directions</td>
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<td>Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate and definitely unacceptable</td>
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<th>Comment ID: PSLPP171/966</th>
<th>Respondent: 10859809 / Mary Branson</th>
<th>Agent:</th>
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The Surrey Hills are an Area of Outstanding Natural Beauty and you state clearly that you will continue to protect the Metropolitan Green Belt and yet the majority of this excessive development proposed is on green belt. How can you possibly reconcile these two conflicting issues? There is a certain lack of honesty here. I object to the plan on these grounds as well.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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I object to the plan to build houses in the green belt. How can you state that you will protect the green belt when you are proposing to build so many houses in the green belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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I strongly object to the GBC local plan on the following points. There is no good reason to remove the Horsley,s from the Green Belt.

No Green Belt land should be released for development around the Horsley,s or Ockham Wisley Airfield as to do this would lead to a breakdown of this rural area of Surrey in the future.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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The document contains three separate comments, each discussing concerns about the proposed changes to the Green Belt and specific policies within it. The comments are as follows:

**Comment ID: pslp171/856  Respondent: 10861217 / Lesley Mantell  Agent:**

- **Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
- **Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object to Policy 2 at paragraph 4.3.17 because Tannery lane is narrow and completely unsuitable for lorry access with many near missed collisions with cars, lorries and cyclists for gods sake this is a small village, what is it going to take...someone to die!!

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

**Comment ID: pslp171/1623  Respondent: 10861441 / Peter Read  Agent:**

- **Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
- **Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I OBJECT to the removal from the Green Belt of homes in Guildford Road, northern end of Glaziers Lane, Flexford, Walden Cottages & Palm House Nurseries traveller site.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

**Comment ID: pslp171/1618  Respondent: 10861569 / Christine Read  Agent:**

- **Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
- **Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

Removal from the Green Belt of homes in Guildford Road, northern end of Glaziers Lane, Flexford, Walden Cottage & Palm House Nurseries traveller site.

I OBJECT to this proposal as removing the Green Belt protection as these sites contribute to the openness of the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<th>Comment ID: PSLPP16/15656</th>
<th>Respondent: 10862977 / Neil Langridge</th>
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<td>The building of thousands of homes on Green Belt is further destruction of the claim that the plan &quot;protects our most important countryside, landscapes and heritage&quot;. The NPPF requires that any development on Green Belt has support of local residents, but GBC are utterly incapable of proving that.</td>
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<th>Comment ID: PSLPP16/436</th>
<th>Respondent: 10863937 / Monica Pashley</th>
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<td>I OBJECT TO all erosion of the Green Belt</td>
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<td>I OBJECT TO the removal of any village from the Green Belt thus leaving them open to unlimited future development</td>
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<th>Comment ID: PSLPP16/11820</th>
<th>Respondent: 10863969 / Joanne Rooke</th>
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<td>I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)</td>
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<td>There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.</td>
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<th>Comment ID: PSLPP16/13859</th>
<th>Respondent: 10864065 / Alec Mcindoe</th>
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<td>I object to all removal of land from the Green Belt, particularly the removal of Send, Ripley, Wisley and Clandon.</td>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/5019  **Respondent:** 10864353 / Eildert Jan Panman  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I believe that the available brownfield land in Guildford town should be used to provide high density homes for the many people who already work in Guildford and support it while being unable to live in it. This land should not be used for further commercial development which would employ yet more people who could not live in Guildford and would have to commute there. GBC has chosen this path with the consequence that 65% of its new homes would be built on land currently on the Green Belt, despite the majority Conservatives promising before the election that the Green Belt would be safe with them. Therefore I object to Policy P2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/5020  **Respondent:** 10864353 / Eildert Jan Panman  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy P2 Para 4.3.13 proposes that East Horsley be inset from the Green Belt. I object to this. East Horsley is a rural village with narrow, winding, tree-lined lanes. Houses are mostly detached with large gardens. Its character has been preserved in the Green Belt without preventing new housing being built (149 new homes in the village between 2000 and 2015).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/5022  **Respondent:** 10864353 / Eildert Jan Panman  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the proposals in Policy P2 para 4.3.16 to change the settlement boundaries of East and West Horsley. I object to Policy A39 which proposes to remove five hectares of land from the Green Belt by moving the settlement boundary from its natural course along the deep ditch behind the houses on the west side of Ockham Road North to the eastern boundary of Lollesworth Wood.

I object to the settlement boundary being moved to take Kingston Meadows out of the Green Belt. This open space is the chief recreation space for the Horsleys, used daily for sports, walking, training and socialising and regularly for big community events like the recent Queen's Birthday Party. It is integral to the physical and social wellbeing of the area and must stay available to the community.
I object to Infrastructure Policy I2 and 13 because they are inadequate to the needs of housing expansion in the Horsleys. The local lanes are narrow and winding, poorly drained and lit with narrow or no pavements. Ockham Road North and South is too narrow for the ever increasing number of enormous trucks using it and has the constraint of the narrow, arched railway bridge that regularly suffers vehicle strikes. The Medical Centre runs to capacity and so do local schools. The station car parks are full every day.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1599  Respondent: 10865537 / Edwina Fassom  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4701  Respondent: 10865889 / Dreda M Todd DBO  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to Send and Ripley villages being removed from the Green Belt.

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1233  Respondent: 10866305 / Christine Reeves  Agent:
I object to the latest plan to remove our greenbelt for development. I was going to highlight all my concerns but after seeing the Ripley action groups website their specific points say it all.

I do not understand why councils/government do not look to build more towns well away from existing villages/towns as they did years ago with Milton Keynes. Building within existing villages totally over runs them and there are never amenities put in place to cope with schooling, doctors surgeries and traffic management. If there is an incident on either the A3 or the M25 it becomes totally gridlocked in Send Marsh/Send/Ripley as all the A3 traffic comes off and through Ripley.

I OBJECT STRONGLY

1. Not protecting the Green Belt
   I object to the proposals to remove Ripley, Send and Clandon from the Greenbelt. There are no special circumstances to do this. Once taken the green belt is lost forever.

2. Disproportionate size of sites in relation to rural locations
   I object to the allocation of land to the strategic sites of Wisley Airfield, Garlicks Arch (Ripley/Send border) and Gosden Hill (Clandon). The proposed development of these sites will have a disproportionate impact on the surrounding local villages. They will have a permanent impact on each of these communities.

3. Unbalanced allocation of development in one area of the Borough
   Between the M25 and Burpham, a distance of only about 5 miles it is proposed that over 6,500 houses are built. This represents over 40% of the housing proposed in the Local Plan. I object to this area being hit so hard by the allocation of development, which is disproportionate to the rest of the Borough.

   I object to the development of the strategic sites due to A3 and M25 already being at capacity during peak hours. Highways England has no plans to look at improving the A3 before 2020. It is therefore not sustainable to identify sites for further development which will worsen the congestion on these motorways and trunk roads.

5. Congestion on the local village roads and lanes
   Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. I object to further development which will cause greater congestion in and around our villages.

6. Unsuitability of our local roads for heavy vehicles and more traffic
   Many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

7. Poor air quality concerns
   Further congestion, particularly in built up residential areas will only lead to greater levels of air pollution. I object to further development, which will result a fall in the air quality.
8. Lack of proper infrastructure planning for sites
   I object to the lack of planning and implementation of infrastructure. For example at Garlick’s Arch. Without
   improvements to the infrastructure prior to development, the existing residents’ quality of life will significantly
deteriorate in many ways. How will the local services such as doctors and schools cope?

9. Lack of Utilities Capacity
   Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network
   and sewers. I object to the development of Garlick’s Arch on the ground that there is little capacity in these
   networks.

10. Sites being planned in unsustainable locations
   Many of the strategic sites e.g. Wisley Airfield and Garlick’s Arch, are in unsustainable locations. They do not
   benefit from railway stations within easy walking distance and bus services across rural villages are forever
   reducing. Residents will have few options, but to be reliant on motor vehicles. I object on the grounds that these
   sites are not sustainable.

11. Parking issues in local villages caused by larger population
   Many of the affected villages, such as Ripley, already suffer from parking problems. Further development
   around these villages will only result in more traffic and more parking problems. To which I object.

12. Local healthcare facilities will be overwhelmed
   Without proper planning and a commitment to fund new healthcare facilities, existing services such as the
   Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are
   already at capacity and suffering from funding cuts or freezes. I object due to the further stress it will put upon
   existing health services.

13. Local policing facilities will be overwhelmed
   Police services are seeing funding reduced. The development of the likes of Garlick’s Arch and Wisley Airfield
   will stretch the police services further and I object.

14. Local social welfare facilities will be overwhelmed

15. Local shops/restaurant facilities will be overwhelmed

16. No protection of heritage assets

17. No protection of the environment

18. 1 Overdevelopment of sites

19. Not meeting the needs of local communities

20. Insufficient affordable housing

21. Poor quality of layout and housing design

22. Insufficient consideration of SPA, SSI and Conservation Area issues

23. Lack of proper cycle lanes on local roads

24. Lack of proper pedestrian footpaths on local roads

25. Current SHMA figure of 693 p.a. too high

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPP16/10906  **Respondent:** 10866721 / Andy Court  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )**

**Not protecting the Green Belt**
I object to the proposals to remove Ripley, Send and Clandon from the Greenbelt. There are no special circumstances to
do this. Once taken the green belt is lost forever.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
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<tr>
<th>Comment ID: PSLPP16/4096</th>
<th>Respondent: 10866945 / Kristine Good</th>
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<td>I request that my objections to the Guildford Borough Local Plan are shown to the Planning Inspector.</td>
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<tr>
<td>I object to Send Village being removed from the GREEN BELT. Send's green belt provides an essential buffer preventing Woking and Guildford becoming one large sprawling conurbation, and the green belt is essential to retaining its village character. More cars, more heavy lorries, more congestion, more industrial building, more houses will put unprecedented strain on our village and change its character and residential village living experience for ever which can never be regained. This disregard of existing green belt is in breach of previous manifesto promises by local and central government and contrary to previous public consultations.</td>
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<td>I object to the large proposed development at of 2,000 houses at WisleyAirfield, 2,000 houses at GosdenHill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce further congestion on the A3 and surrounding roads including Send.</td>
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<td>I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity.</td>
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<th>Comment ID: PSLPP16/13452</th>
<th>Respondent: 10867009 / Paul Good</th>
<th>Agent:</th>
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<th>Comment ID: PSLPP16/13095</th>
<th>Respondent: 10867105 / Steve Loosley</th>
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I object to the removal of Send from the Green Belt because the village and its countryside provides a necessary buffer between Woking and Guildford.

2. I object to the building on the Green Belt at Send at Garlick’s Arch, Clockbarn Nurseries and Send Hill because it is not justified by any special circumstances and the fact that Green Belt is meant to be permanent and not continually eroded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/14964  Respondent: 10868513 / Tom Stevenson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

As a resident of East Horsley I write to object to your proposal to remove the villages of East and West Horsley from the Green Belt.

If the Borough Council had set out with the intention to destroy the character of East and West Horsley, it could not have chosen a better route than to remove the villages from the Metropolitan Green Belt.

Paragraph 86 of the National Planning Policy Framework states: “If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt.”

The open character of East and West Horsley self-evidently does make an important contribution to the openness of the Green Belt. And therefore these villages must remain in the Green Belt.

Furthermore, paragraph 83 of the NPPF states that “once established, Green Belt boundaries should only be altered in exceptional circumstances”. I do not accept that your forecasts of future housing needs in the Borough, which are themselves suspect, constitute “exceptional circumstances”. Indeed, it is apparent that ministerial guidance (for example the written ministerial statement by Brandon Lewis, Parliamentary Under Secretary of State for Communities and Local Government, on 17 February 2014) supports this view.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/992  Respondent: 10868609 / Robert Lockie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to further erosion of the green belt.
2. I object to any any villages being removed from the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11676  Respondent: 10868609 / Robert Lockie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

• I object to Send and the surrounding area being taken out of the Green Belt. It was meant to be a permanent requirement and no justifiable reason has been identified as to why this should not be continued. The Green Belt in Send stop stops Woking and Guildford becoming a conurbation
• I object to Send and the surrounding area being taken out of the Green Belt because local councillors and central government were elected in 2015 on the clear promise of protecting the Green Belt and local councillors, most
of them from the Conservative Party, are in clear breach of their election promise and going against what their own party in central government want.

- I object to Send and the surrounding area being taken out of the Green Belt because, regardless of the proposed development in the local plan, taking the area out of Green Belt will give carte blanche for development in future

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/6351  **Respondent:** 10868737 / P Molesworth  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

Finally I object to the large scale removal of green belt area which appears to be a back door approach to further development without considering the impacts specifically for the proposed development at the time.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/77  **Respondent:** 10869025 / E.J. Bartlett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I OBJECT TO THE 2016 DRAFT LOCAL PLAN

- I object to any erosion of the Green Belt. The Green Belt exists for a reason - to protect the countryside. Once the Green Belt has been lost, it is gone forever
- I object to any 'in-setting' (i.e. removal) of any villages from the Green Belt

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/17185  **Respondent:** 10869441 / Chris & Louise Dorman  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I also object to the erosion of the green belt and the proposal to remove the Horsleys from it. The exceptional circumstances required to do so have not been adequately shown. The primary school is full and there is no specific plan to deal with the effect on that. The roads are already in need of constant maintenance from usage, pot holes, problems with flooding causing erosion of the road surface and more housing and increasing the population will not only put excessive pressure on our roads, schools, sewage and water systems but also increase pollution. It will erode the special...
characteristics of the Lovelace villages and we must protect and respect their proximity to National Trust Properties and land, to West Horsley Place (of historic interest) and to Horsley Towers and maintain the beautiful countryside and biodiversity of the nature living in it.

I also support the views of the Horsley Countryside Preservation Society and I object to the local plan for the reasons stated above. The proposals for 593 houses in the Horsleys, the creation of Wisley Village, development around Ripley, Ockham etc would seriously impact the current residents lives and is an area which should remain protected by the green belt for future generations because of its openness and historical value.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Comment ID: PSLPP16/4146</th>
<th>Respondent: 10869921 / Kate Haskins</th>
<th>Agent:</th>
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I am writing to you to make my strong objections known to the latest planning proposals that will destroy the quality of life for my family and others living in Send and Ripley. Over the last months and even years, I am stunned at the level of development that is being proposed by the very people who are meant to represent the lives and families in their boroughs. I will make my latest objections clear one by one.

Firstly, I object to Send and Ripley being removed from the Green Belt. Whilst I am sure that our villages being in the greenbelt is very tiresome for local planners who otherwise have to stand up to central government, not to mention developers offering money to build extraordinary levels of housing in our local communities, the green belt’s purpose was intended to be permanent and there is absolutely no justification for abandoning it. Quality of life for those already living in the greenbelt will be destroyed and the levels and density of housing will create the kind of unrest that has been seen time and time again when excessive development is victorious over sensible levels of planning with adequate investment in supporting facilities. I am sure that local councillors don’t need reminding that they are elected to represent their local constituents, of which they are doing a very poor job. Clear election promises have been broken. Have those running the borough lost all sight of their role and purpose?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: pslp171/1757</th>
<th>Respondent: 10870593 / Maureen Blackburn</th>
<th>Agent:</th>
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I object to Policy 2 at paragraph 4.3.15 Again the views will be spoilt. Traffic will be impossible. Send is about to completely ruined with the efforts o the GBC!!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/9780</th>
<th>Respondent: 10871329 / Lyn Gargan</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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1. **I object to Policy P2.** It is wrong in principle to remove Send from the Green Belt. The Send area provides a rural buffer separating the major urban areas of Guildford and Woking. Removal of Send from the Green Belt risks effectively linking Guildford to Woking through a virtually complete developed strip through Send and thus effectively turning them into a single huge conurbation of the type we already see further west in the Farnborough/Aldershot/Ash area. **I object to Policy A25 (Gosden Hill Farm) for this reason:** stretching along the A3 from Burpham/Merrow to a point well beyond the end of Potters Lane in Send, it is the first step in this process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am writing to object in the strongest terms to the building on green belt land in the area of Send, Ripley, Send Marsh, Burnt Common and the Clandons.

I object strongly to the changes in the Green Belt boundaries, This is not justified.

All the Green Belt sites locally meet the five purposes of Green Belt inclusion.

The Green Belt serves five purposes:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp171/62  **Respondent:** 10871329 / Lyn Gargan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

Taking Send Business Park out of the green belt completely.

- The Send Business Park on Tannery Lane has been to all intents and purposes a non-conforming user in an area of natural beauty adjacent to the river Wey navigation. To extend this use will change the very nature and fabric of the area.
- The narrow road which allows access to the existing industrial site is already an issue for the community and to extend the site will cause traffic and snarl ups on an already heavily used main road through Send. A road that is used by school children to access their education, both by walking and by buses to schools outside the village. Making an even earlier start for the buses to get the children to school on time through the rush hour traffic.
- Another very important consideration to take in to account is the destruction of the openness of this area, due to the Green Belt protection. In my view a wanton dismantling of an important environment that we, as residents and members of this community, treasure.

Please consider very carefully before you irreparably destroy this area for reasons that don't adhere to the values and lives that we live.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/5377  **Respondent:** 10872001 / Allanah Morris  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**
Removal of the green belt would mean easy use of cheap farming land for housing rather than using appropriate more expensive brown field sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5379  Respondent: 10872001 / Allanah Morris  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Provision of housing with all amenities such as suggested in the brown field site at Wisley Airfield would appear more appropriate cause less disruption.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11692  Respondent: 10872545 / David and Rachel Price  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

This would be a very detrimental leaving both the Horsleys exposed to the spread of urbanization from all sides. The two distinct areas of West and East Horsley would lose their separate identities and merge with each other, and the creeping tide of development would engulf from Effingham, and Bookham, and, if it were to go ahead, the new proposed development of over 2000 houses in Ockham. The green belt must not be removed from the Horsleys and the ‘exceptional circumstances’ that are required to be shown before taking this drastic action have not been demonstrated. The Horsleys lie adjacent to the area of the Sheepleas, a designated Area of Natural Beauty, Site of Special Scientific Interest, and Local Nature Reserve. To allow unchecked development to the south of this beautiful and special place should removal of the green belt be proposed, would be truly sad. The area is well loved by visitors from far and wide, not just from the local area, who come to enjoy the natural beauty of these ancient woodlands, and undisturbed meadows. But the other areas of more ordinary green space, the fields, the hedges, the patches of woodland, the wildlife corridors, are all very special, and deserve our protection. The protection of our fragile environment must be the number one consideration here. Once it’s gone it’s lost forever. Surrey is a under ambush from the creeping tide of urbanisation probably more than any other county in the country and we need to make firm decisions regarding it’s safeguarding NOW.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11695  Respondent: 10872545 / David and Rachel Price  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

To extend the boundaries into the village settlement, is just another sneaky way to allow more land to become available for development, and again will increase the size of our two villages to ridiculous proportions, bearing in mind the lack of
infrastructure. No sound reasons have been given as to the actual reason for doing this, apart from making it much easier for future development to get through. This needs to be addressed further.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6546  Respondent: 10872577 / Carol Finlayson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

My concerns regarding the plan are as follows:

• Why are you planning to build on the green belt when not all brownfield areas have been utilised and other less contentious areas are available for development? Losing the green belt means this land is lost for ever and opens the door to never ending expansion. How long will it be before a retail park is built on the outskirts of the village?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5956  Respondent: 10872801 / Graham Philip  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to Ripley and Send being removed from the Green Belt. This area of Green Belt prevents the joining up of Guildford and Woking and is against the principles agreed by local councillors and central government to protect the Green Belt. The rash of new development being now discussed would just be the beginning.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6928  Respondent: 10872961 / Liz Cass  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy P2: Green Belt

Policy P2 states that: “We will continue to protect the Metropolitan Green Belt.” However, through the housing policies set out in the Document, GBC appears to be in breach of this policy through the housing policies. **Approx. 65% of the developments** proposed by GBC are to be built on land currently within the Metropolitan Green Belt and there appears to be little attempt to reduce housing delivery in order to take account of this.

**Paragraph 4.3.13: Proposal to inset East Horsley from the Green Belt**
Policy P2 proposes that East Horsley should be inset from the Green Belt. East Horsley is set in a rural location and the village has the look and feel of a rural village. Its Green Belt status has been a key factor in preserving the rural character and openness of this village, and this is a key factor in attracting people to relocate to the village, often from the built up areas of South West London. By train, it remains a commutable distance to London, and its rural setting is a key factor in attracting people looking to relocate. Development on the Green Belt would undoubtedly erode the attractiveness and appeal of East Horsley.

The Green Belt has existed for many decades, with good purpose and great success, and I do not believe there is evidence that this situation should be reversed at this time.

I object to the proposal to inset East Horsley from the Green Belt and request that this proposal is removed from the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1985  
Respondent: 10873313 / Rob Stevens  
Agent: Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I Object to the proposal to inset Send Business Park from the Green Belt. Its in the greenbelt, clear and simple. Coming up with sneaky ways to circumnavigate protection for the Green belt seems to be GBC's plan to force through development which will cause long lasting devastation to the local villages and all ton meet some quota someone has made up. GBC should be defending us from this short sighted approach, protecting the green belt for us and for future generations and standing up for us. There are so many reasons this should not proceed. I am not sure how many times we can mention that Tannery Lane is a small rural lane with poor access and it simply cannot accommodate more traffic. Send and surrounding villages deal with a lot of traffic and to suggest adding more by finding a way to get this out of the greenbelt (despite the fact its clearly within and surrounded by greenbelt) is unacceptable. Its the thin edge of the wedge and you know it... you start with this and then it simply opens up the option for further development. GBC needs to step up and stop ANY intrusion or impact to the greenbelt.

Please share with the planning inspector.

I truly hope you do listen to the objections, to the locals and the overwhelming concern for the impact to our villages and the green belt. The area cannot take the level of development you are proposing and there is simply not a need either. Stop this and put these plans to death. Do your jobs and protect the local area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7673  
Respondent: 10873377 / Rebecca Howard  
Agent: Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

It is simply astonishing that the Council is considering building new housing in the Green Belt when there is so much unused brown field land in the Borough that could be used for housing. There are no “exceptional circumstances” to justify changes to the Green Belt and I can only assume that recommendations to do so are being determined by developers’ preferences in terms of where they can make the most profit.
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<th>Comment ID: PSLPP16/11921</th>
<th>Respondent: 10874241 / James Grzinic</th>
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<td>I object to the proposal to remove the Horsleys from the Green Belt on the grounds that the ‘exceptional circumstances’ required before taking this action have not been demonstrated.</td>
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<td>I object to the proposed extension of the boundaries of the settlement areas of the Horsleys because I do not believe that any sound reason for this to take place has been given.</td>
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<td>I object to policy P2 (green belt) they seemed to have ignored what the impact of building on Greenbelt land will have on water catchment, air pollution and bio diversity. What will the effect of the cars from 2000 new houses on the proposed Wisley development do to the already high air pollution levels along the A3/M25, Ockham, Horsley area. The loss of so much Metropolitan Greenbelt will not help the air pollution of London. Providing some bit of greenbelt on the other side of Guildford even further away from London will not help, neither will people want to travel there. The only people who it helps are the Ex., and Present leaders of the council who come from Ash ,the new proposed Greenbelt.</td>
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<td>Policy P2 I object strongly to the insetting of both Horsleys from the Green Belt. A large percentage of new housing is proposed to be built in the greenbelt and this land is mainly in the North-East of the borough which is closest to London. This greenbelt land was meant to help keep the air clean and fresh and prevent encroachment of the metropolitan area. I object to the proposed new change to the settlement boundaries to the South (part Policy P2).</td>
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<td>Respondent: 10875969 / Valerie Austin</td>
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<td>I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land that could be regenerated. What changes (2016)/further amendments (2017) do you suggest should be made to the document? Attached documents:</td>
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<th>Comment ID: PSLPP16/14536</th>
<th>Respondent: 10876033 / Lucie Paulson</th>
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<td>I object to the part under sites which include any building on the greenbelt. - Residents' views not being taken into account, there is huge strength of feeling here. Where are these exceptional circumstances for greenbelt building? I object to the proposals for the Wisley airfield site (site A35) - totally disproportionate in size to the surrounding settlements and too dense relative to surrounding areas. There is a real risk of &quot;them and us&quot; emerging given the strength of local feeling against this development. I think it could cause real unrest in the area and potential discord between new and old residents. What changes (2016)/further amendments (2017) do you suggest should be made to the document? Attached documents:</td>
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<th>Comment ID: pslp171/1454</th>
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<td>I OBJECT to the proposal to inset Send Business Park from the Green Belt because: - It is effectively an old non-confirming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation. - There is highly restricted vehicular access along Tannery Lane in both directions. - Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate. What changes (2016)/further amendments (2017) do you suggest should be made to the document? Attached documents:</td>
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<th>Comment ID: pslp171/564</th>
<th>Respondent: 10876833 / J. C. ROBSON</th>
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I object in the strongest possible way to the Policy 2 at paragraph 4.3.15 change

I object to the proposal to inset Send Business Park from the Green Belt because

- It is non-confirming user in an area of outstanding countryside directly next to the beautiful Wey Navigation.
- There is vehicular restriction along Tannery Lane in both directions
- Further development will impact the Green Belt and the openness of the area
- Further development will impact the character / heritage of the village
- Further development will lead to increased traffic in the area, an area that is already severely congested
- Further development will impact flora and fauna in the Green Belt
- Further development will increase noise levels in the local area

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17257    Respondent: 10876897 / Norman and Morag Evans    Agent:

Document:    Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Destruction of the Green Belt - I OBJECT

The ruling party on GBC has acted dishonestly and dishonourably over the Green Belt. Having promoted its protection at every election for decades and made the same pledge last year, it now claims it has ‘listened’ to the people of Guildford, yet produces a plan barely different from the

2014 version but which includes widespread development - TWO-THIRDS of which is on Green Belt land. This is contrary to their own policies, those of central Government and those of the NPPF. The Council even has the gall to include in its Plan the sentence: ‘We will continue to protect the Green Belt’!

The new Plan also includes removing about 15 villages in the borough from the Green Belt and changing the Green Belt boundaries. There is no justification for this except to facilitate future development. Removing Green Belt status from villages will leave them vulnerable to excessive development and result in the merging of villages causing an ‘urban’ sprawl, exactly the outcome the Green Belt was designed to protect.

At the last General Election, the Tories’ manifesto promised to protect the Green Belt and to retain the rules governing it. These state that development can only be allowed on Green Belt land in exceptional circumstances and that housing need does not count as sufficient reason. They also say that Green Belt boundaries cannot be changed or moved, again except in exceptional circumstances. GBC have not given a single reason why there are special circumstances for sacrificing so much Green Belt land. Why do they think that the rules do not apply to GBC, especially when only a few years ago they made a legal challenge to protect the borough’s Green Belt?

The Plan’s totally unacceptable assault on the Green Belt will, in effect, destroy the concept of protection throughout the borough and beyond. It must be resisted if we are to retain the sort of countryside that the British know and love - and want retained.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
2. One of the most glaring errors in the Plan is the total disregard for planning constraints, in particular the Green Belt. This is a matter of major concern to Guildford residents, as shown in the responses to the earlier versions of the Plan.

a) Guildford Conservatives have acted shamefully and undemocratically, deliberately lying to the Guildford electorate in order to retain power and proceed with their development-led Plan. In the 2015 local elections, they produced campaign material making vows and pledges to ‘save the Green Belt’, yet as soon as they were returned, they produced the then new version of the Local Plan which envisaged nearly two-thirds of all proposed development on Green Belt land. It is utterly disgraceful. Even now, after a consultation which saw the Council again lambasted for its proposed destruction of the Green Belt, this latest version proposes development of nearly 60% of new housing on Green Belt land.

b) Earlier this year, the Communities Secretary described Green Belt land as ‘sacrosanct’. The then housing minister also used the phrase and added in a television interview: ‘There is no need to build on large tracts of Green Belt land’. Why is it, then, that Guildford Conservatives have turned a deaf ear? And why is it that trust in the Conservatives is at an all-time low?

c) There is no justification for removing the Horsleys and other villages from the Green Belt. The Horsleys, in particular, represent a Green Belt line of defence against further outward development outside the M25. If these and the other development proposals are allowed, there will be almost continuous development from outer London all the way to Guildford, Woking and even beyond. The removal of the Horsleys from the Green Belt will increase development, destroy openness and result in the loss of character and diversity. Moreover, the proposed Green Belt boundary changes in East Horsley will result in similar losses, while increasing the settlement area by an unacceptable 37%.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Policy P2 - Green Belt

I object – to the proposed insetting of villages from the Green Belt, and the green light given to infilling. This means to villages are open to development as well as the allocated sites. Green Belt protection is national policy – its protection was strongly promoted by national political leaders in the 2015 General Election and by most candidates, including those of the majority party in Guildford, in the 2015 Local Elections.

Appeal case law has shown that even if housing need does exist, that does not automatically over-ride the protection accorded by the Green Belt legislation.

Guildford B.C. claims that less than 2% of Green Belt will be lost, but factoring in the insetting of villages, the figure appears to be nearer 6%.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Policy P2, Green Belt

I OBJECT to the statement 4.3.15 which states that 14 villages are ‘now inset from the Green Belt’ – factually untrue, as no decision has been made. These villages are at present actually in the Green Belt.

I OBJECT to the proposal to remove Send Business Park from the green belt. Tannery Lane is narrow – single track in places – in both directions. The lane lacks pavements. There is already planning permission for a marina and it will be dangerous to stress the road further.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Rectify the inaccuracy of the text.

Withdraw the proposal to remove Send Business Park from the Green Belt.

I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

1) The exceptional circumstances required to take the Horsleys out of the Green Belt do not appear to have been proved. The Green Belt is the most valuable protection we all have to prevent uncontrolled urban sprawl and MUST not be given up lightly.
2) Whilst there is clearly unfulfilled Housing Need in the area which must be addressed it is not in itself a Special Circumstance needed to upset the Green Belt and the Housing needs requirement shown seems to be arbitrary and unproven.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13670  Respondent: 10877153 / Carol Ann Cullen  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the proposal to remove the Horsleys from the Green Belt. I do not agree that the exceptional circumstances required before taking this action have been demonstrated. I am alarmed that 65% of new houses are to be built on land that is currently in the Green Belt. It is imperative that Green Belt Land is preserved.

I OBJECT to the extension of the boundaries of the settlement areas of the Horsleys.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7843  Respondent: 10877217 / D E Cooper  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We object to the removal of Effingham Village from the Green Belt.
We object to the removal of the surrounding villages of East Horsley, West Horsley, Ripley and Send from the Green Belt.

We firmly believe that the Green Belt needs to be protected. There may be parts of the Green Belt where it may be appropriate for the Parish Councils to consider developing, but this should be the exception rather than the general rule. Removing in toto all these villages from the Green Belt means a loss of habitat for wildlife, loss of wildlife corridors, and the loss of trees whose leaves absorb pollution. We already contend with major roads such as the A3, the M25 and an increasing amount of heavy and light vehicular traffic on our roads, so it is vital that our ‘green lungs’ are protected.

The Parish Councils are best placed to decide where small housing developments are appropriate and any total loss of Green Belt status could open the doors to wholesale, unwanted and unsustainable development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3693  Respondent: 10877313 / Millie Lipscombe  Agent:
I previously emailed you on 21 Sept 2014 with my objections to the draft Local Plan covering East & West Horsley and Ockham. As I understand that my previous objections will not be taken into account, I am therefore repeating my objections in this email below. In addition, to my previous objections, I wish to make **Additional Points** and these follow on after my **Original Points**.

**Original Points**

- The removal of East & West Horsley and Ockham from the green belt is just not tenable. You have not demonstrated the exceptional circumstances why this action is necessary.

You have not given good reasons for the proposed extension of the boundaries of the settlement areas of both East & West Horsley.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/3919  **Respondent:** 10877409 / Peter Lipscombe  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

On 21 September 2014, I previously emailed you with my objections to a draft Local Plan covering Ockham, East & West Horsley. I understand that my previous objections will not be taken into account in the current consultation. I am therefore repeating my objections in this email below.

I strongly object to the proposed plans on the following basis:-

You have not demonstrated a proper case for the removal of the Green Belt boundaries from West Horsley.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/3928  **Respondent:** 10877409 / Peter Lipscombe  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

- Why is there not more development made of brownfield sites instead of developing greenbelt sites?

In addition, now that we have had a referendum and Brexit is to happen, we should not be destroying the countryside when there is no longer the same unproven anticipated housing requirements and at such a frenetic pace at that.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<td>I object to the loss of Green Belt land.</td>
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<td>I OBJECT to the removal of the Horsleys from the green belt. I have no objection to sustainable development PROVIDING the character of any new development does not clash with surrounding properties or increase the density of existing property.</td>
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<td>I OBJECT to the extension of the boundaries of the settlement areas. This appears to be proposed solely to increase the amount of land designated for development.</td>
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<td>The proposal to remove the Horsleys is outrageous. No “exceptional circumstances” have been demonstrated. The Council has a duty to protect the Green Belt for future generations. No sound reasons have been given for the proposed extension of the settlement areas of the Horsleys.</td>
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I object to all erosion of the green belt.

I object to any removal of villages from the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the removal of Send from the Green Belt because the village and its countryside provides a necessary buffer between Woking and Guildford.

I object to the building on the Green Belt at Send at Garlick’s Arch, Clockbarn Nurseries and Send Hill because it is not justified by any special circumstances and the fact that Green Belt is meant to be permanent and not continually eroded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

1. I OBJECT to the failure of the proposed plan to adequately protect the Green Belt. The Green Belt is not being protected. Some 65% of planned development is on Green Belt, and this is in breach of the statement in the Local Plan that “We will continue to protect the Metropolitan Green Belt”.

2. I OBJECT to the proposal to inset East Horsley from the Green Belt. East Horsley is in a rural location and has the look and feel of a rural village. The proposal to inset East Horsley from the Green Belt will be detrimental to the rural character of the village and should be dropped.

3. I OBJECT to the proposal to remove Fangate Manor in East Horsley from the Green Belt and include it within the Settlement Boundary. There are no exceptional Planning circumstances to justify removing Fangate Manor from the Green Belt, and changing the Settlement Boundary does not in any way enhance the defensible nature of the Settlement Boundary. It merely involves moving the boundary from one hedgerow to another, but leads to the loss of Green Belt, agricultural land and wildlife habitat.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
### Comment ID: PSLPP16/11000  Respondent: 10878977 / Lisbet Hjort Jensen  Agent:

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

1. **I OBJECT** to the proposal to move the East Horsley settlement boundary westwards to the eastern boundary of Lolliesworth Wood and to the proposal to take all of Kingston Meadows out of the Green Belt as a result of another proposed change to the settlement bound These and other changes that I have highlighted earlier are not justified under National Planning Policy Framework rules.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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### Comment ID: PSLPP16/6528  Respondent: 10879457 / Louisa Scott  Agent:

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

- I object to the removal of Send from the Green belt because the village and countryside provide a necessary buffer between Guildford and Woking- there are no special circumstances that can be justified for building on the Greenbelt land. P2

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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**Objections to Guildford Borough Proposed Submission Local Plan June 2016**

I object most strongly to the Guildford Borough Proposed Submission Local Plan (June 2016)

I list below the main reasons for my objection

1. **I object to the not protecting the Green Belt (Policy P2)**

I strongly object to removing the villages of Ripley, Clandon and Send from the Green Belt.

In addition the sites of Wisley Airfield and Garlicks Arch must not be removed as their development would wreck the local area creating an urban rather than a green environment. As required by the National Planning Policy there are no exceptional circumstances for the above sites being removed from the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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Government gave a clear election promise to protect the Green Belt. The current proposals renege on those promises.

There are no special circumstances to justify Send losing its Green Belt status; it acts as a buffer to separate Guildford from Woking and therefore it is essential that its Green Belt status be retained.

1. The Green Belt is not something that can be taken away by unrealistic Government targets; greedy property developers or a spineless Borough Council who prefers to develop in the areas that they believe will give them the least resistance.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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</tbody>
</table>

I object to Send being removed from the Green Belt. The Green Belt was intended to be permanent, as required by the National Planning Policy Framework, and I am not aware of any special or extenuating circumstances which justify abandoning it. There was a clear election promise by local councilors & central government to protect the Green Belt and the he current proposals renege on those promises.
1. Send’s Green Belt acts as a buffer to separate Guildford from Woking it is essential that its Green Belt status be retained. If this is lost Developers will be quick to take advantage and there will be nothing to stop them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/16529</th>
<th>Respondent:</th>
<th>10880609 / S. Groves</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
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<td>is Legally Compliant?</td>
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</tbody>
</table>

I OBJECT to Send Village being removed from the Green Belt. The Green Belt was intended to be permanent, as required by the National Planning Policy Framework, and there are no special circumstances to justify abandoning it. Send’s Green Belt provides an essential buffer stopping Woking and Guildford becoming one large conurbation. Local councillors and central government gave a clear election promise to protect the Green Belt and this plan reneges upon that election promise. Developers will be quick to take advantage of the removal of Send from the Green Belt and then there will be nothing to stop further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/9768</th>
<th>Respondent:</th>
<th>10880993 / Roger Knee</th>
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</table>

I object to all erosion of the Green Belt.

I object to the removal of all villages from the Green Belt. GBC has NO MANDATE to take this action.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID:</th>
<th>pslp171/1404</th>
<th>Respondent:</th>
<th>10881217 / Ben Stevens</th>
<th>Agent:</th>
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<td>is Legally Compliant?</td>
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</table>

I object to Policy 2 at paragraph 4.3.15. I do not think Send Business Park should be inset from greenbelt land. It is in a beautiful quiet rural lane in an area of outstanding natural beauty which is why we all have chosen to live and work here. There is highly restricted vehicular access along Tannery Lane in both directions and as it is. This is, and should remain an area of outstanding beautiful countryside adjacent to the Wey Navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The sites proposed in West Horsley are currently within established Green Belt. The policy on protection for the Green Belt is contained in section 9 of the National Planning Policy Framework, which sets out the fundamental aim of Green Belt policy. Policy on development in Metropolitan Green Belt is set out in paragraphs 79 - 92 of the NPPF. Inappropriate development is, by definition, harmful to Green Belt and the NPPF states that it "should not be approved except in very special circumstances". Local planning authorities are advised to "regard the construction of new buildings as inappropriate in Green Belt".

The Framework also states that a Green Belt review should only happen in "exceptional circumstances". This concept is further elaborated as being "for example when planning for larger scale development such as new settlements or major urban extensions". The Green Belt in Surrey is established with detailed boundaries, therefore "exceptional circumstances" must be demonstrated to necessitate the change to its boundaries. No exceptional circumstances or other justification have been made for the proposed new Green Belt boundaries. There are identified brownfield sites in the borough which have not been seriously considered in the borough plan.

Policy P2 of the Guildford Plan states that Guildford Borough Council "will continue to protect Metropolitan Green Belt against inappropriate development." I am totally opposed to the removal of West Horsley from the Green Belt by insetting and the extension of boundaries and believe that the proposed development is wholly inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am writing to object to the proposed plan for massively increasing the number of houses & industrial spaces on GREEN BELT LAND.

I object to changing designated Green Belt into designated Future Development land.

I would also like to state my disgust at the total contempt shown towards the people living in the area, by the council, who have clearly and demonstrably ignored all the concerns raised over past plans by proposing plans that will be far more damaging to the area

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object in the strongest terms to the removal of Send, Ripley and Clandon from the Green Belt.

It was my understanding that the Government stated, in a letter by Housing and Planning Minister Brandon Lewis, that “demand for housing alone will not change Green Belt boundaries”. Indeed National Planning Practice Guidance states that “unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the ‘very special circumstances justifying inappropriate development on a site within the Green Belt’.

Therefore, I was absolutely horrified to learn of your intention to “inset” or rather REMOVE Ripley, Send and Clandon from Green Belt status in order to circumnavigate this difficulty and I strongly object. It is apparent that you have no respect for the National Planning Practice Guidance and you appear to have little respect for the general members public who live, work and pay their council tax in this area. I reach this conclusion because it seems you are prepared to ride roughshod over any commitments by Government to preserve the Green Belt for future generations.

As an ordinary member of the public, I had absolutely NO idea that you had classified different areas of Green Belt into areas of sensitivity i.e. those you would be prepared to lose from the Green Belt and those areas you wouldn’t. I feel absolutely furious as well as utterly betrayed because I do not feel this has EVER been made clear to the general public. Many of us have chosen specifically to live in and invest in houses here because we adore living in this area surrounded by beautiful countryside and I am one hundred percent certain we have paid a premium for doing so.

I can see that the reason that you wish to remove the land around these villages from green belt status is for expediency. I can see how it would be an easy solution for you but once removed, you will have changed the character of our villages forever thereby having a dramatic affect on their desirability as places to live and work. It is a decision that will never be able to be reversed.

I object to the 400 house development that has been planned at Garlick’s Arch and I object to the 7,000 sq meter industrial site. I feel that the impact of such an enormous development in Send is completely disproportionate and will cause absolute chaos at the Burnt Common/Shell roundabout which is already often congested in the mornings and evenings as people vie for access to and from the A3. In addition to this of course it will only add to the current congestion on the A3 which for anyone who lives here is a daily battle.

I also object to the high number of 45 houses being built at Clockbarn because I understand that planning permission has already been granted for 65 houses at the Tannery which means there will be a further 110 houses in Send with all the
extra traffic that will bring down Tannery Lane which is narrow and winding - not to mention all the additional traffic congestion along Send Road.

I object to the 40 houses being built at Send Hill. I understand that the subsoil of the existing site contains asbestos which could give rise to all sorts of health problems for those living there and nearby if this is disturbed.

I strongly object to the way that student housing is included in the calculation of housing needs for permanent residents. To use this fluctuating population which drops for up to six months of every year (4 months over the Summer and 2 more at Christmas and Easter) as a reason would have a dramatic effect on our Green Belt and yet we all know NO students will want to live out in the surrounding villages.

I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3. This will ENSURE gridlock on the A3 for everyone at ALL times of the day rather than between the hours of 7.30 am to 9.30 am and again in the afternoon from 2.30 (yes, it often starts that early!) to 6.30pm - often later. This will mean that because the A3 will be at a standstill - so too will all the surrounding roads as people seek to find alternative routes.

I also object to the failure of GBC to identify sufficient brownfield sites within the urban area which should first be targeted for development which would enable residents to use the railway networks to and from work.

Please confirm receipt of my objections.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1298  Respondent: 10882113 / Amanda Stevens  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Policy 2 at paragraph 4.3.15. I do not think Send Business Park should be inset from greenbelt land. It is in a beautiful quiet rural lane in an area of outstanding natural beauty which is why we all have chosen to live and work here. There is highly restricted vehicular access along Tannery Lane in both directions and as it is, we have articulated lorries travelling up and down this lovely country lane.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/862  Respondent: 10882465 / Colin Bowes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

All,

I am writing to object to the inclusion of Green Belt land in the local plan.

I believe there are enough suitable alternatives.

I note several councillors campaigned for election with a manifesto that included preservation of the green belt. I expect my elected representatives to fight against any use of the green belt.
In particular I object to the inclusion of Three Farms Meadow in the Local Plan. Only a few weeks prior to the local plan being published the proposed development was unanimously rejected on numerous counts. These difficulties will not be overcome in the short or medium term, and I believe the council should not invest further time or money trying to fix this inappropriate development.

**Para 80 NPPF purposes of Green Belt**

Para 80 of the NPPF states that Green Belt serves (inter alia) “to check the unrestricted sprawl of large built-up areas”; and ‘to prevent neighbouring towns merging into one another’. However in the subjective opinion of the GBCS TFM does not to check the unrestricted sprawl of large built-up areas – when taken out of the Metropolitan and strategic context. The Probity in Planning Code of Conduct enjoins Councillors to be ‘objective’ and to ‘uphold the law’. It is objectively the case that TFM **does** check unrestricted sprawl of large built-up areas and **does** prevent neighbouring towns merging into one another. The fact that those large built-up areas and neighbouring towns are in the adjacent boroughs of Elmbridge, Woking and Mole Valley should not exclude them from consideration by Guildford Borough Council.

The plan below illustrates how TFM **does** serve to separate neighbouring towns and check the sprawl of large built-up areas: (see pdf attachment)

(For the avoidance of doubt the distances cited are taken from Google maps and are ‘as the crow flies’ not the actual distances by road.)

TFM fulfils ALL of the purposes of the Green Belt. It did when it was first put into the Green Belt and circumstances have not changed since:

1. **to check the unrestricted sprawl of large built-up areas;**

   *TFM prevents north-south sprawl from London suburbs down to Guildford and east-west sprawl from Woking to Leatherhead. Specifically it stands between the suburbs of Leatherhead (Fetcham and Bookham) and the suburbs of Woking.*

2. **to prevent neighbouring towns merging into one another;**

   *TFM prevents 12 neighbouring towns and villages across 4 boroughs merging.*

3. **to assist in safeguarding the countryside from encroachment;**

   *The site is at the centre of a connected natural landscape.*

4. **to preserve the setting and special character of historic towns; and**

   *Three Farms Meadows sits at the heart of Ockham Village in the parish of Ockham. Ockham has 3 conservation areas and 31 listed buildings and is arranged in 9 historic settlements.*

5. **to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.**

   *70ha out of 114ha is good quality agricultural land in active cultivation – as it has been for centuries. It includes at least 45.4ha of Best and Most Versatile agricultural land. Building on this does not assist urban regeneration.*

The GBCS appears to run the argument that if a plot of land is not the very last plot to stand between two towns then that particular plot does not serve the purpose of separating the towns. That is a bogus and illogical argument. Taken to an absurdity it would imply that only the last blade of grass between two towns served to separate them.

One of the justifications for removing the site from the Metropolitan Green Belt that has been cited is the analysis carried out in the Green Belt and Countryside Study. This compares different sites on the basis of the ‘purposes’ of the Green Belt set out in the NPPF. Those particular criteria are neither the only relevant criteria nor necessarily the best. The purposes set out in the NPPF are necessarily abstract – because it is necessary that they can be applied to every Green
Belt in the country. The NPPF description of the purposes of the Green Belt was not intended to be an exclusive list. It was not intended to imply that purposes not on that particular list were wholly irrelevant and could be safely wholly disregarded.

**Overriding purpose of the Metropolitan Green Belt in serving London**

Every Green Belt is unique and has an overriding purpose over and above these five abstract criteria – namely to protect the particular city or metropolis for which the particular Green Belt was set up. Since TFM was put into the Green Belt to protect Metropolitan London it is also highly relevant how it fulfils that particular overriding purpose.

The GBCS does not ask the question, how does TFM serve London – the metropolis for which the Metropolitan Green Belt exists and the reason why TFM was originally put into the Green Belt. It should. It is in fact the primary and the concrete purpose of this Green Belt. TFM in fact performs an essential purpose within the Metropolitan Green Belt – standing in a strategic position between London and Guildford and between Woking and Leatherhead as this plan shows:- (see pdf attachment)

The economic geography of London and its satellite towns has depended on commuting for some two hundred years and especially since the invention of the train and the car. The system works because London is separated from its satellite towns by green space. This allows fast transit times between the two. If the green space is filled in then the efficiency of the entire system will rapidly deteriorate as congestion clogs the free and efficient movement of people and goods. The signs of such congestion are already much in evidence on the A3 and on the M25 which carry many thousands of vehicles every hour.

Apart from the purposes set out in the NPPF, TFM also fulfils many other important, material and relevant purposes which the GBCS has not considered. Among these are its Environmental and its Heritage purposes. As it is immediately adjacent to a Special Protection Area and a Site of Special Scientific Interest and as it is itself an SNCI, it serves to protect those nature reserves and forms an essential and integral part of a connected living landscape- connecting the nature reserves to other ancient woodland and serving as an important wildlife corridor. And TFM is also at the very centre of the parish of Ockham. Ockham has never been a nuclear village with one defined centre. It is a collection of nine hamlets and the centre of those hamlets is TFM – which is why Ockham Parish Council has submitted an application for TFM to be made an Asset of Community Value. This youtube video describes a little of Ockham’s history: [https://youtu.be/VVnUUDSxKJk](https://youtu.be/VVnUUDSxKJk)

Before removing TFM from the Green Belt the law requires that ‘exceptional circumstances’ are shown. Residents of Ockham have yet to be shown any rational exceptional circumstances.

Is the proposed new Green Belt in Ash qualitatively equivalent in terms of checking sprawl and preventing towns merging? How is it strategic to the Metropolis of London? What are the exceptional circumstances required by law to justify creating new Green Belt in Ash? New Green Belt in Ash is not a substitute for the unique qualities of the Green Belt in Ockham, which should be preserved and protected.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:** [Picture attachments Colin Bowes.docx](281 KB)
This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of ‘About Guildford’ (published by the Council) on page 5 states that ‘... the Plan rejects any schemes that would have a detrimental impact on the Green Belt.’ This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.
In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt and Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/2507  **Respondent:** 10883553 / Steven Davis  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate?** (No), is Sound? (No), is Legally Compliant? (No)

Ripley should not be removed from the green belt. It provides a necessary buffer from the urban sprawl of London. It is important villages separate boundaries are maintained to preserve the village’ way of life’ in this area of Surrey. The attraction of this area of Surrey is its green areas around small villages with individual identities. Please don't sacrifice this for a few extra homes.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/1095  **Respondent:** 10883841 / Gillian Millership  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

be made to protect the green belt and AONB. Why has GBC not sort to do so? I object to paragraphy 4.3.13 Policy P2 proposes that East Horsley be inset from the green belt. East Horsley is set in a rural location and its green belt status has preserved that rural character. Between 2000 and 2015 incremental development of brownfield and infilling sites has seen 149 new homes built in the village, so sensible development is welcomed within the “washed over” status of East Horsley. 36% of East Horsley is woodland which, together with its low density housing and large gardens, give those open spaces that are vital to the character of the greenbelt. Why would GBC wish to destroy this character?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
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<th>Respondent: 10883905 / Anita Marshall</th>
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<td>Guildford Borough Council Proposed Local Plan (June, 2016)</td>
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<td>I wish to lodge my objections to the Draft Local Plan:</td>
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<tr>
<td>1. I object to new housing being built on the Green Belt.</td>
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<td>2. I object to former Wisley Airfield being removed from the Green Belt (Now referred to as “Three Farms Meadows”)</td>
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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<td>4. I object to a plan proposing that 70% of your housing “need” should be built on Green belt sites; there being absolutely no “exceptional circumstances” to justify such a stand, whilst the regeneration of existing brownfield sites is the obvious path to follow.</td>
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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<td>If you are planning to take the local villages out of the green belt due to the lack of green space around them, then this, and the other planned developments around this area, will help with this plan.</td>
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<td>if you keep planning on building on the green areas and not considering the environmental factors then of course how can we consider them to be part of a 'green belt'.</td>
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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<th>Respondent: 10884897 / Eric Voller</th>
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</table>
I object to the fact that 14 villages are proposed to be removed from the Green Belt and also that village boundaries are proposed to be increased, to allow for more development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4278  Respondent: 10884929 / Kim Mackenzie  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The totally unnecessary proposal to remove the Horsleys from the Green Belt. The Green Belt has been the mainstay in controlling urban sprawl in the past. Why might this happen? Please do not destroy it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4280  Respondent: 10884929 / Kim Mackenzie  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The extension of the settlement areas of the Horsleys. To meet what need? Or is it simply to facilitate planning approvals for future plans?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1098  Respondent: 10884993 / Dave Fassom  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not adress Garlick’s Arch, so there is no evidence base to support including this site.
Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/6842  Respondent: 10889985 / Ruth Macdonald  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with the sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires that there be an exceptional circumstance for the Green Belt boundaries to be altered, as for any development on the Green Belt. There are no exceptional circumstances for these villages as mere housing need does not constitute a ‘special circumstance’ for encroachment on the Green Belt. Once taken, the Green Belt is lost forever.

There is a real danger that the loss of this Green Belt would result in urban sprawl and the neighbouring villages merging together. The significant development proposed for these villages will result in the character of these villages being completely lost and the surrounding countryside encroached upon. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13489  Respondent: 10890177 / Cheryl Burnside  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( }, is Sound? ( ), is Legally Compliant? ( )

POLICY P2

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.
Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.
GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/395  Respondent: 10890177 / Cheryl Burnside  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the extended development in the Green Belt (Policy P2, Site A43)

I object to Garlick’s Arch (A43) being extended and the resulting urban sprawl. There are no exceptional circumstances for this site being removed from the Green Belt, as required by the National Planning Policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6453  Respondent: 10891265 / Jillian Berton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I strongly believe that the Horsley’s should remain in the green belt as it has thus been designated for many years past.

Surely there should not be any plan for such a complete and radical wrecking of the whole village environment which will leave a catastrophic effect in many ways on people’s lives and affect children’s appreciation of their surroundings and also have its effect on the whole Surrey landscape and on natural habitats of wild creatures and would involve the destruction of valuable and massive trees so necessary for health and wellbeing of all live beings .

It appears that this plan will have a big effect on the whole area overloading the already stretched in all aspects – transport, good roads, medical facilities, drainage etc. as mentioned. Reduction of housing numbers, A 2000 house village at Ockham’s Wisley Airfield seems just wrong on a site from where so many men gave up their lives for the battle of Britain for a green and pleasant land to remain, it would be better if just a very few houses could be built there, with a small but significant public memorial to those who made a supreme sacrifice in WW2.

This is what people need to have.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/864  Respondent: 10892097 / Steve Whatley  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
1. I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, together with the site at Garlick’s Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

The Plan should develop the existing brownfield site at Burnt Common rather than developing Garlick’s Arch (A43).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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This would be very detrimental leaving both the Horsleys exposed to the spread of urbanization from all sides. The two distinct areas of West and East Horsley would lose their separate identities and merge with each other, and the creeping tide of development would engulf from Effingham, and Bookham, and, if it were to go ahead, the new proposed development of over 2000 houses in Ockham. The green belt must not be removed from the Horsleys and the ‘exceptional circumstances’ that are required to be shown before taking this drastic action have not been demonstrated.

The Horsleys lie adjacent to the area of the Sheepleas, a designated Area of Natural Beauty, Site of Special Scientific Interest, and Local Nature Reserve. To allow unchecked development to the south of this beautiful and special place should removal of the green belt be proposed, would be truly sad. The area is well loved by visitors from far and wide, not just from the local area, who come to enjoy the natural beauty of these ancient woodlands, and undisturbed meadows. But the other areas of more ordinary green space, the fields, the hedges, the patches of woodland, the wildlife corridors, are all very special, and deserve just as much protection.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Extension of the boundaries of the settlement areas of the Horsleys

This is just another to increase more areas into the village settlement, in the hope that more land will become available for development, and again will increase the size of our two villages to ridiculous proportions, bearing in mind the lack of infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I would like to register objections to Guildford Borough Council Proposed Local Plan (June 2016) and inclusion in the plan of proposed multiple development sites in the Horsleys:

**Urbanisation of the Green Belt**

I strongly object to removal of the land areas in the vicinity of the Horsleys from the Green Belt. The Green Belt prevents urban sprawl and retains important wildlife corridors in proximity to the highly urbanized areas of outer London. It helps maintain clean air quality and provides recreational areas for urban dwellers from both Greater London and adjacent conurbations.

There are five legal reasons for protection of land assigned as Green Belt:

1. To check the unrestricted sprawl of large built up areas
2. To prevent neighbouring towns merging into one another
3. To assist in safeguarding the countryside from encroachment
4. To preserve the setting and special character of historic towns
5. To assist in urban regeneration by encouraging the recycling of derelict and other urban land

The provision of the Green Belt in the vicinity of the Horsleys meets the criteria listed above. The National Planning Policy Framework (NPPF) requires any change of Green Belt boundaries to demonstrate exceptional circumstances. Unmet housing need is not an exceptional circumstance in law. In addition the existence of the Green Belt/AONB is a reason for *not* meeting objectively assessed housing need (i.e., such protected land is a legal constraint against any such development). The Draft Local Plan has not demonstrated exceptional circumstances requiring additional housing.

**Removal of Villages from the Green Belt**

I strongly disagree with and object to the assumption made in the Draft Local Plan that it is reasonable to remove villages such as West and East Horsley from the Green Belt. It seems remarkable that a single act of Parliament by the current Government can undo the good work for the provision of the Green Belt and protection of rural England laid out in the Town and Country Planning Act of 1947. The rationale behind the need to protect rural areas in close proximity to ever growing metropolitan areas is more relevant today than ever, in light of the projected growth in UK population.

I object to the method of defining settlement hierarchy as described in the Draft Local Plan. In particular, I take exception to the "classification" of East Horsley as a "Semi-Urban Village" and question the basis for this classification. Horsley lacks most of the infrastructure and community facilities taken for granted in an urban area. The key charm and attraction of Horsley is essentially it's rural character.

To accrete large numbers of new houses to the Horsley - Okham area would change the character of these ancient villages permanently, resulting in a detrimental impact on the environmental and village character.

In summary, I strongly object to the proposal in the Draft Local Plan to take the following villages out of the Green Belt: East Horsley and West Horsley (North), Effingham, Ripley, Shere and West Horsley (South).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I OBJECT to the removal of Send from the Green Belt which was designed specifically to prevent Woking and Guildford becoming one sprawling housing estate. No justification has been given and its removal runs counter to national policy and manifesto commitments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to not protecting the Green Belt (Policy P2)

Our Green Belt is precious. It is what protects London from urban sprawl; it preserves air quality; it prevents flooding; it is the city’s playground. It is for us to conserve and protect it. There are 5 legal purposes for Green Belt, and it meets them all:

- To check the unrestricted sprawl of large built up areas
- To prevent neighbouring towns merging into one another
- To assist in safeguarding the countryside from encroachment
- To preserve the setting and special character of historic towns
- To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

This policy is flawed and should have been amended. In the last consultation just six individuals, out of the c. 7,000 of those who took part in the consultation, supported the policy. Another 20 comments of support were from organisations such as: the University of Surrey, local councils (including Guildford), consultants (e.g. Savills) or landowners. But of the 1,371 who commented on the green belt policy 1,332 (97%) were against.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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NO EXCEPTIONAL CIRCUMSTANCES

The local plan proposes nearly 9000 new homes to be built on Green Belt land (compared with ~ 5000 current homes in Guildford, so approx. equal to 18% of the existing homes in the borough) – a huge proportion. The National Planning Policy Framework (NPPF) requires any change of Green Belt boundaries to demonstrate exceptional circumstances. Unmet housing need is NOT an exceptional circumstance in law. No exceptional circumstances have been disclosed. So the Green
Belt boundaries should NOT be changed through the plan making process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13467  Respondent: 10894945 / Peter Pearce  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing to object to the above planning application

I OBJECT and am appalled at the Council once more wanting to pass an application that is on GREEN BELT land and failing to adopt sensible and realistic proposals which meet local and national guidelines and priorities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13342  Respondent: 10895009 / Holly Broughton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

• I object to the removal of the attractive open country side which is part of the permanent Green Belt which is protected under the National Planning Policy Framework. It also represents unrestricted sprawl and goes against the purposes of the Green Belt which include the prevention of merging of towns and settlements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13347  Respondent: 10895009 / Holly Broughton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

• I object to the large proposed development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send, Send Marsh and Ripley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6954  Respondent: 10895137 / Katrina Broughton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/7106</th>
<th>Respondent: 10896065 / Georgia Bean</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<tr>
<td>I object to the Green Belt status being removed from Send, Send Marsh, Ripley and the Clandons. The effect will be that we will become part of the urban sprawl of Woking. The Green Belt is meant to be permanent and not continually eroded</td>
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<tr>
<td>I object to the removal of the attractive open country side which is part of the permanent Green Belt which is protected under the National Planning Policy Framework. It also represents unrestricted sprawl and goes against the purposes of the Green Belt which include the prevention of merging of towns and settlements</td>
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<td>Attached documents:</td>
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</tbody>
</table>

Comment ID: PSLPP16/7823  Respondent: 10896801 / Clare Fluker  Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 | Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) | |
| I am writing to advise of my objections to the new Guildford Borough local Development plan recently published | |
| Loss of Green Belt Land: I strongly object to the expansion of the Horsley village boundaries and its subsequent removal including Ripley, Send and Clandon from the Green Belt. The new mayor of London has instructed London planners NOT to approve development on Green Belt Land within the M25. If we continue to build on our countryside it won’t be too long before we have none left. There is insufficient details and/or evidence within the local plan to support why this action is necessary and therefore I strongly object. Our British countryside needs to be preserved along with our wonderful animal, bird and plant life which will be inevitably affected by the erosion of the Green Belt Land. | |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? | |
| Attached documents: | |

Comment ID: PSLPP16/7824  Respondent: 10896801 / Clare Fluker  Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 | Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) | |
| The proposal to remove villages including the Horsleys from the Green Belt makes a mockery of the whole concept of the Green Belt and just seems to be a rather cynical attempt to permit more development within the village boundaries. | |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? | |
| Attached documents: | |

Comment ID: PSLPP16/7824  Respondent: 10896801 / Clare Fluker  Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 | Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) | |
With regard to the proposed extension of those boundaries there appears to be no logic to them and they seem solely to be aimed at increasing the area within the village boundaries (see above) available for development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6226  Respondent: 10896833 / Margaret Morgan  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the removal of Send from the Green Belt because the village and its countryside provides a necessary buffer between Woking and Guildford.

I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because this is a precious open space to be kept as a legacy for future generations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1324  Respondent: 10897217 / Warren Hogben  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

2. I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick's Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

The Plan should develop the existing brownfield site at Burnt Common rather than developing Garlick's Arch (A43).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/949  Respondent: 10897633 / A Aldridge  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Green Belt Policy 2 at paragraph 4.3.15

I object to the proposal to inset Send Business Park, Tannery Lane, from the Green Belt for the following reasons:-
It is adjacent to the Wey Navigation and would appreciably reduce the enjoyment of walkers and boat users along the river.

Tannery Lane is a narrow country road with poor visibility, restricted access at both ends and in many places is a single track with few passing places.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**GREEN BELT GENERALLY**

I am concerned by the extent of the proposed erosion of the Green Belt and object to the current proposals. I understood that one of the purposes of the Green Belt is to maintain adequate separation between villages and settlements etc. and to prevent a sprawl of development over time that effectively joins such areas together, with little or no separation. When examining the proposed local plan, the conclusion is that the proposed erosion of the green belt, particularly along the A3 corridor, between the M25 and Guildford would result in an unacceptable situation. The character of Send & Ripley would be lost and the proposed development at Gosden Hill would almost merge with the proposed expanded areas of Send/Ripley Villages. For this reason, I strongly object to the current proposals.

**IN-SETTING**

I object to the extent of the proposed in-setting where significant areas to Send, Clandon/Burpham and Ripley are to be removed from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1307  Respondent: 10898113 / V A Lewis  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the proposal to inset Send Business Park from the green belt because - There is highly restricted vehiculare access along Tannery Lane in both directions - have you even been to see Tannery Lane see also Policy A42 above All these developments are inthe green belt. Ripley is the first real village from London on the A3 and GBC seems intent on the destruction of these villages and the local countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3406  Respondent: 10898625 / James Hampton  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the proposal to inset Send Business Park from the green belt because - There is highly restricted vehiculare access along Tannery Lane in both directions - have you even been to see Tannery Lane see also Policy A42 above All these developments are inthe green belt. Ripley is the first real village from London on the A3 and GBC seems intent on the destruction of these villages and the local countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2793  Respondent: 10898721 / J Hawkins  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to any “in-setting” or removal of any villages from the Green Belt. Again, this is contrary to the stated aims of the Plan to retain the special heritage and landscape; it appears to be a precursor to expand some villages into towns.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLP171/1733  Respondent: 10899137 / Justina Buswell  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Green Belt Policy 2, at paragraph 4.3.15; I object to the proposal to inset Send Business Park from the Green Belt for the following reasons:

It is a non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation.

Tannery Lane, as previously mentioned, is a small country lane which should remain as such and is totally unsuited to increased traffic volume.

Any additional expansion or development in this position will have a significantly detrimental effect on the Green Belt land in this location.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2784  Respondent: 10899233 / Frederick Hookins  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
My name is Frederick Hookins [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998]

I am writing to object to the plan to take Send and Ripley from the Green Belt which was intended by the government to protect the countryside: Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10827  Respondent: 10899233 / Frederick Hookins  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to all insetting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2894  Respondent: 10900385 / Michael Mills  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I strongly object to all insetting of villages from the Green Belt. Especially as the electorate in the last local elections were promised that the elected councillors would protect the Green Belt

I strongly object to any "in-setting" (ie removal) of any villages from the Green Belt. The proposed 2016 Draft Local Plan by these elected councillors will destroy the local villages of which they were elected on their promise to keep the Green Belt currently surrounding these villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5296  Respondent: 10900609 / Beverley Gear  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

There is not the need for such a large amount of housing as GBC has suggested. I realise that there is a need for housing but not to the detriment of losing Green Belt, congested roads, over-subscribed schools and doctors. The South East of England is already highly populated and there are other areas of England which would be more suitable to have larger housing developments.

In my opinion, these developments should NOT be approved and NOT be allowed to go ahead.
**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/2919  **Respondent:** 10900641 / E.J. Mills  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I strongly object to the 2016 Draft Local Plan for the following reasons.

I strongly object to all erosion of the Green Belt. Especially as the electorate in the last local elections were promised that the elected councillors would protect the Green Belt.

I strongly object to any "in-setting" (ie removal) of any villages from the Green Belt. The proposed 2016 Draft Local Plan by these elected councillors will destroy the local villages of which they were elected on their promise to keep the Green Belt currently surrounding these villages.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/18173  **Respondent:** 10900897 / Mark Timmings  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object (yet again) to the local plan. I see no improvement since the last local plan and in fact it appears things have got even worse!

The development is ridiculous in the extreme, it will destroy the village communities of Ripley, Send and Clandon. We neither have the infrastructure to support this level of development or (frankly) the need. I strongly disagree with the seeming disregard for the green belt which will ultimately connect everything creating an urban sprawl.

Yet again I note that there are no exceptional circumstance to the destruction of the greenbelt save making some building firms very rich, why not instead look to develop/redevelop brownfield sites before looking to destroy the countryside.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/157  **Respondent:** 10901121 / Bernie Hales  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I Object to the 2016 Draft Local Plan,
The items listed below are being objected to as subjects not addressed by the Planning Policy of Guildford Borough Council.

1. I object to all erosion of the Green Belt
2. I object to any "in-setting" (Removal) of any villages from the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/13822</th>
<th>Respondent: 10902401 / Nick Enderby</th>
<th>Agent:</th>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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</table>

I strongly object to Send Village being removed from the green belt as it creates a natural and much needed division between neighbouring villages

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<thead>
<tr>
<th>Comment ID: PSLPP16/17074</th>
<th>Respondent: 10902561 / Maureen Ruddock</th>
<th>Agent:</th>
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</table>

1. The Proposal to remove the Horsleys from the Green Belt. This is simply outrageous. The Green Belt should be sacrosanct – once it is gone, it will be gone forever. It should not be tampered with and should be allowed to remain to be enjoyed by future generations just like our generation has enjoyed it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/16370</th>
<th>Respondent: 10902817 / TJ Deacon</th>
<th>Agent:</th>
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</tbody>
</table>

I object to the removal of large areas of villages from the Green Belt. I moved to this area because the area was protected by the Green Belt from excessive development. The villages are vital to the health of Guildford as a borough maintaining the rural feel of the borough. Green Belt status should not be removed from any area without full examination of alternative sites to meet the exceptional need of the development. Removing the status removes the requirement to carry out this examination. The character of the villages within Guild for Borough boundary do make a significant contribution to the openness of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
<table>
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<tr>
<th>Comment ID: PSLPP16/4120</th>
<th><strong>Respondent:</strong> 10904865 / Michael W.R. Herwig</th>
<th><strong>Agent:</strong></th>
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<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
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<tr>
<td>I OBJECT to the proposals to build on Green Belt in the Guildford Borough Council area.</td>
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<tr>
<td>I OBJECT to the scale of building on the Green Belt in the Send, Send Marsh and Burnt Common area.</td>
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<td>I OBJECT to the lack of evidence to support such large scale building.</td>
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<tr>
<td>I OBJECT to Guildford Council's belief that it is &quot;progress&quot; to convert all our Green Belt to concrete and tarmac just to satisfy some badly researched need for extra housing and industry.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<th>Comment ID: PSLPP16/3682</th>
<th><strong>Respondent:</strong> 10905185 / D White</th>
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<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
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<tr>
<td>I OBJECT to the destruction of ANY part of the Green Belt when a sustainable requirement has not been proven AND NONE HAS.</td>
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<td>I OBJECT to the removal of some 128 ha of Green Belt in the areas of Send, Send Marsh, Burnt Common and Gosden Hill Farm and its conversion to concrete and tarmac.</td>
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<tr>
<td>I OBJECT to the insetting of the Send area which removes some 39 ha from the Green Belt. By this action Guildford B.C. is promoting and encouraging residential and industrial development in an area where perceived need has NOT been proven.</td>
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<tr>
<td>I OBJECT to Guildford Council's double standards when in &quot;About Guildford&quot; you state the Plan rejects any schemes that would have a detrimental effect on the Green Belt. You do not appear to understand your own evidence and publicity.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<th>Comment ID: PSLPP16/3398</th>
<th><strong>Respondent:</strong> 10905825 / Bridgette Hampton</th>
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</tbody>
</table>
I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13981  Respondent: 10906081 / TK and AM Williams  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I strongly object to the Guildford Borough Council plans to inset East/West Horsley from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9139  Respondent: 10906145 / Joe Gervasio  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2016).

I object on these grounds:-

1. I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley Send and Horsley from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl.

These villages and their countryside provides a necessary buffer between Woking and Guildford. The Green Belt is not some irritating bit of officialdom to worked around by planners. It is for the prevention of merging of towns and settlements which would otherwise create unrestricted sprawl. If these villages were removed from the Green Belt in time there would be continuous development between Woking and Guildford.

70% of the sites put forward in the Local Plan are in the Green Belt which flies in the face of current government planning policy. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18121  Respondent: 10910273 / Lynda M Williams  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Local Plan Policy P2 states that: *We will continue to protect the Metropolitan Green Belt.* We fully and un-equivocally support this policy.

Unfortunately, despite such brave words, GBC appears to be in breach of this policy itself through the housing policies that it has set out in the Local Plan. The analysis included in the Appendix shows that around 65% of the developments proposed in the Proposed Submission Local Plan are to be built on land currently within the Metropolitan Green Belt. We consider this outcome to be outrageous.

Under NPPF rules, GBC is permitted to make allowance for factors which may constrain the delivery of new housing, such as the need to protect the Metropolitan Green Belt or the restrictions required to protect the Surrey Hills Area of Outstanding Natural Beauty (‘AONB’) which is offered protection under the NPPF comparable to that of a national park. Although these areas make up a large proportion of the land area of Guildford Borough, GBC makes no attempt to reduce its housing delivery in order to take account of such constraints. We find this approach inexplicable.

There are also a number of further issues relating to the detailed implementation of this policy which are set out further below:

a) Paragraph 4.3.13: Proposal to inset East Horsley from the Green Belt

Policy P2 proposes that East Horsley should be inset from the Green Belt, instead of being ‘washed over’ as it is today. Currently development is permitted within the settlement boundary, although this area is still considered to be Green Belt with a particular planning regime being applicable.

East Horsley is set in a rural location and the village has the look and feel of a rural village. Its Green Belt status has been a key factor in preserving that character. Moreover, being ‘washed over’ by the Green Belt has not been a serious constraint on development within the village. For example, GBC’s planning records indicate that no less than 149 net new homes were added to the village housing stock through in-filling and brownfield developments between 2000 and 2015.

GBC attributes the need to inset East Horsley to NPPF requirements, arguing that the test for remaining ‘washed over’ is that the village should make an important contribution to the openness of the Green Belt. This East Horsley clearly does. No less than 36% of East Horsley is composed of woodlands, whilst inside the settlement area there is an average housing density of just 8.1 dwellings per hectare (‘dph’). Woodlands and large residential gardens make a vital contribution towards bio-diversity, provide wildlife corridors, and furnish those open spaces which are vital to the character of the greenbelt. It is one thing for a planner to study a map and see a settlement area filled with housing, but it is quite another actually to come to a rural village like East Horsley and see how the Green Belt has preserved the rural character and openness of this village.

Today East Horsley is a picturesque and flourishing rural community, which has and continues to experience steady incremental growth as a result of being ‘washed over’ by the Green Belt. As the saying goes: “If it ain’t broke, don’t fix it”. This applies to East Horsley in the matter of insetting.

EHPC therefore OBJECTS to the proposal to inset East Horsley from the Green Belt and requests that this proposal be dropped from the Local Plan.

b) Paragraph 4.3.16 and Proposals Map: Settlement Boundary changes in East Horsley

GBC are proposing to make a number of changes to the settlement boundaries of East Horsley and so expand the settlement area, as set out in the Proposals Map, with the justifications seemingly provided in the Green Belt & Countryside Study prepared by the consultants, Pegasus.

We object to two specific boundary changes, which have been proposed, as follows:

1. There is a proposal to move the East Horsley settlement boundary westwards from behind the houses on the west side of Ockham Road North up to the eastern boundary of Lollesworth This proposal removes over 5 hectares of agricultural fields from the Green Belt. The present boundary line is clearly defined by a deep and well-maintained drainage ditch which is classified by the Environment Agency as a ‘main river line’ and therefore represents a highly defensible Green Belt boundary.
Moving this boundary west to the edge of woodland in no way improves its defensibility. Under NPPF rules Green Belt boundaries should only be changed in 'exceptional circumstances'. We do not believe this proposal can be considered as an exceptional circumstance. Clearly the only justification for this change is to bring a large agricultural field within the settlement area in order to provide more housing land. However, under NPPF rules this is not a sufficient justification for changing a Green Belt boundary. As such, we believe it is an invalid proposal.

**EHPC accordingly OBJECTS to this proposed boundary change.**

2. There is also a proposal to move the East Horsley settlement boundary westwards from behind the houses on the west side of Kingston Avenue up to a tree line running along the Parish Boundary at the western edge of Kingston. The result is to take all of Kingston Meadows out of the Green Belt.

Kingston Meadows is the main public recreational space of East Horsley, comprising various sports facilities and playing fields. The present settlement boundary is clearly defined by a deep and well-maintained drainage ditch running along its eastern side. It therefore represents a very defensible Green Belt boundary. Moving this boundary westwards to the edge of woodland in no way improves its defensibility. Under NPPF rules Green Belt boundaries should only be changed in 'exceptional circumstances'. We do not believe that this can be considered as an exceptional circumstance. As such we believe this is an invalid proposal.

**EHPC accordingly OBJECTS to this proposed boundary change.**

In the Green Belt & Countryside Study and its accompanying Topic Paper, GBC justifies the need to make changes in settlement boundaries in order to meet unfulfilled housing need in the Borough. However, Green Belt rules make it clear that unfulfilled housing need is not normally considered to be ‘an exceptional circumstance’. If it were the entire Green Belt would already be covered in tarmac.

The NPPF is clear that every movement in settlement boundaries must be justified by ‘exceptional circumstances’. GBC have offered only a generic justification in their Topic Paper of meeting unfulfilled housing need, but a case by case justification has not been provided. As such, we believe the settlement boundary changes referred to above (and many others) are invalid without such detailed justification.

c) Paragraph 4.3.17: Proposal to remove Wisley Airfield from the Green Belt

**EHPC OBJECTS to the proposal to remove Wisley Airfield from the Green Belt.** The only justification for this proposed change is unfulfilled housing need which is not considered an exceptional circumstance. The proposed Wisley development is discussed further below in the Site Allocation section.

d) POLICY P2: Limited In-filling

A new planning designation has been introduced called ‘the identified boundary of the village’. For East Horsley this covers a number of roads south of the A246. It is a sizeable area, covering 45 hectares, the equivalent of 23% of the present Settlement Area of the village. Within this area, Policy P2 sets out proposals that would allow ‘limited in-filling’ within this boundary.

We find it hard to reconcile the opening statement of Policy P2 that “We will continue to protect the Metropolitan Green Belt” with this sizeable reduction in effective Green Belt status. In our opinion, this policy represents a de facto extension of the Settlement Boundary and a substantial reduction in the operational effectiveness of the Green Belt, whose effectiveness is significantly weakened where this new planning designation applies.

**EHPC accordingly OBJECTS to the proposal to designate roads south of the A246 as being within the ‘identified boundary of the village’ and to allow limited infilling within this area.**
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10110  Respondent: 10910369 / Karen Doyle  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to all insetting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12732  Respondent: 10910625 / Alyson Blackwell  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy P2 – Green Belt: I object to this significant erosion of the Green Belt with the proposals for large towns being developed on Green Belt land thereby removing the openness of the Green Belt. I note in particular the huge developments proposed for the North East quadrant of the borough which will adversely affect our amenity, but also unfairly targets our tranquil rural villages because we can provide ‘dormitory’ facilities for commuters to London. The developments directly affecting our villages are the proposals for Wisley Airfield, Gosden Hill Farm, various farms and tracts in the Horsleys and Garlicks Arch at Send.

Further, on the erosion of Green Belt and I object that Policy P2 is not met where it states that Green Belt should be protected. I object to the disproportionate use of Green Belt land for housing – some 65% of the housing proposed is on Green Belt and with little consideration being given to redevelopment of brown field sites.

I object that GBC are contravening the NPPF framework stipulation in paragraph 87 with the proposed developments at Gosden Hill Farm, Ripley, East and West Horsley and Garlicks Arch, Send. Paragraph 87 states “As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.” and GBC have not proven any special circumstance for developing on these Green Belt areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12739  Respondent: 10910625 / Alyson Blackwell  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to building on the Green Belt because the essential characteristic of Green Belt is its openness and permanence (National Planning Policy Framework paragraph 79).
I object to all other strategic sites in the Local Plan, Blackwell Farm, 3 Farms Meadows, Garlick’s Arch, West Horsley and Hog’s Back. All are out of proportion to the surrounding area and none qualify for the exceptional circumstances required to take them out of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy. These sites have been targeted by developers who have no interest in the area. They are simply looking to make massive profits by buying green belt land at a modest sum and selling it for a massive profit once its green belt status has been withdrawn. Is this why the existing brownfield site at Burnt Common has been shelved and Garlick’s Arch has been substituted at the last minute? The Plan should develop the this existing brownfield site at Burnt Common rather than developing Garlick’s Arch (A43).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object removing Send Business Park from the Green Belt (4.3.15).

Send Business Park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for it’s insetting (removal) from the Green Belt, and indeed GBC have not even attempted one. Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The first line of Policy P2 states, ‘We will continue to protect the Metropolitan Green Belt against inappropriate development.’ I am totally opposed to the village's removal from the Green Belt by insetting and extending the 2003 Local Plan Settlement Area boundaries. No exceptional circumstances or other justification is made for the new Green Belt boundaries that will result from the proposed insetting of the two parts of the village from the Metropolitan Green Belt. I believe the Green Belt & Countryside Study is flawed. West Horsley's defined Settlement Area boundaries (ref
2003 Local Plan) DO NOT need to be extended. West Horsley Parish is one of a rich and varied mix of well-established low housing density settlements with a considerable number of historic buildings. Positioned on the north side of the North Downs, partly in the Surrey Hills an area of outstanding natural beauty, it attracts a considerable number of recreational visitors (walkers and cyclists) through the seasons each year.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1966  Respondent: 10911201 / Claire Walker  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I still object to Policy P2 as redrafted since it still does not address a very large proportion of the thousands of objections made to the previous version. I particularly object to the reference in paragraph 1 to the Policies Map: the words “as shown designated on the Policies Map” must be deleted if this paragraph is to be of any use at all. I object to the proposals that the settlements of Normandy, Flexford and Walden Cottages, and the traveller sites to the rear of Palm House Nurseries (A49) and Whittles Drive (A50), should be inset from the Green Belt. These are all areas and sites contributing to the openness of the Green Belt and also contributing to the views to and from the Hogs Back AONB. I also object to the insetting of other villages from the Green Belt and “infilling” of others and wholesale extension of settlement boundaries across the Borough. Such changes ignore the importance of a permanent Green Belt preventing urban sprawl and providing a “green lung” which should be protected, with any individual changes being subjected to rigorous scrutiny and being dependent on clear demonstration of exceptional circumstances justifying any over-riding of the Green Belt provisions. I would also point out that para 4.3.13 is incorrect and misleading in saying that a long list of villages are now inset from the Green Belt – this simply refers to GBC’s proposal last summer, to which there have been huge objections from residents and which we hope will be rejected through the Local Plan process.

Exceptional circumstances must be demonstrated in order to develop Greenbelt yet despite the weight of public opinion against weakening of this policy, 70% of new housing development will be in the countryside, of which, 58% will be in Greenbelt. By definition, this is not an exception and no attempt is made to demonstrate exceptional circumstances, in line with the requirements of the NPPF. Insetting villages is of concern since restrictions within the settlement boundary raises concerns over loss of character. The Rural Economic Strategy covered in 4.51a, promoting affordable homes everywhere in the countryside including the AONB as a main aim, is a mechanism for promoting overdevelopment in our countryside. It has not been subject to full public consultation and is based on data, which is not up-to-date.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11115  Respondent: 10911425 / Andrew Gray  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. National planning policy requires that there be exceptional circumstances for the Green Belt boundaries to be altered. I can see no exceptional circumstances for these villages and sites being removed.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15505  Respondent: 10911425 / Andrew Gray  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There is no evidence of exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2039  Respondent: 10912385 / Berend Du Pon  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Under the proposed Plan the identified boundary for the village is drawn between our house, [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998], and that of our neighbours at [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998], which is all of 6 ft from us, which seems perverse.

We would ask you to take another look, please, and request that our property be included within the 'Identified Settlement Boundary'.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14036  Respondent: 10912513 / Sarah Green  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the erosion of the Green Belt in clear contravention of the Government’s and Conservative councillors’ election manifesto promises to protect the Green Belt. In particular, I object to Send being removed from the Green Belt (Policy P2) as Send provides a buffer between Woking and Guildford.
2. I object to the insetting of Ripley.
3. I object to the insetting of West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to the erosion of the Green Belt in clear contravention of the Government’s and Conservative councillors’ election manifesto promises to protect the Green Belt. In particular, I object to Send being removed from the Green Belt (Policy P2) as Send provides a buffer between Woking and Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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East Horsley is set in a rural location and the village has the look and feel of a rural village. Its Green Belt status has been a key factor in preserving that character. Moreover, being ‘washed over’ by the Green Belt has not been a serious constraint on development within the village. For example, GBC’s planning records indicate that no less than 149 net new homes were added to the village housing stock through in-filling and brownfield developments between 2000 and 2015. GBC attributes the need to inset East Horsley to NPPF requirements, arguing that the test for remaining ‘washed over’ is that the village should make an important contribution to the openness of the Green Belt [NPPF: only those villages whose open character makes an important contribution to the openness of the Green Belt should be included in the Green Belt. Those that do not should be inset, or removed, from the Green Belt and other development management policies used to restrict any inappropriate development]. It is clear that East Horsley clearly does make an important contribution to the openness of the Green Belt. No less than 36% of East Horsley is composed of woodlands, whilst inside the settlement area there is an average housing density of just 8.1 dwellings per hectare (‘dph’). Woodlands and large residential gardens make a vital contribution towards biodiversity, provide wildlife corridors, and furnish those open spaces which are vital to the character of the greenbelt. It is one thing for a planner to study a map and see a settlement area filled with housing, but it is quite another actually to come to a rural village like East Horsley and see how the Green Belt has preserved the rural character and openness of this village.

Today East Horsley is a picturesque and flourishing rural community, which has and continues to experience steady incremental growth as a result of being ‘washed over’ by the Green Belt. As the saying goes: "If it ain’t broke, don’t fix it”. This applies to East Horsley in the matter of insetting. I therefore OBJECT to the proposal to inset East Horsley from the Green Belt and request that this proposal be dropped from the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Paragraph 4.3.16 and Proposals Map: Settlement Boundary changes in East Horsley

GBC are proposing to make a number of changes to the settlement boundaries of East Horsley and so expand the settlement area, as set out in the Proposals Map, with the justifications seemingly provided in the Green Belt & Countryside Study prepared by the consultants, Pegasus.

I object to two specific boundary changes, which have been proposed, as follows:

i) There is a proposal to move the East Horsley settlement boundary westwards from behind the houses on the west side of Ockham Road North up to the eastern boundary of Lollesworth Wood. This proposal removes over 5 hectares of agricultural fields from the Green Belt. The present boundary line is clearly defined by a deep and well-maintained drainage ditch which is classified by the Environment Agency as a ‘main river line’ and therefore represents a highly defensible Green Belt boundary. Moving this boundary west to the edge of woodland in no way improves its defensibility. Under NPPF rules Green Belt boundaries should only be changed in ‘exceptional circumstances’. I do not believe this proposal can be considered as an exceptional circumstance. Clearly the only justification for this change is to bring a large agricultural field within the settlement area in order to provide more housing land. However, under NPPF rules this is not a sufficient justification for changing a Green Belt boundary. As such, I believe it is an invalid proposal. I OBJECT to this proposed boundary change.

ii) There is also a proposal to move the East Horsley settlement boundary westwards from behind the houses on the west side of Kingston Avenue up to a tree line running along the Parish Boundary at the western edge of Kingston Meadows. The result is to take all of Kingston Meadows out of the Green Belt. Kingston Meadows is the main public recreational space of East Horsley, comprising various sports facilities and playing fields. The present settlement boundary is clearly defined by a deep and well-maintained drainage ditch running along its eastern side. It therefore represents a very defensible Green Belt boundary. Moving this boundary westwards to the edge of woodland in no way improves its defensibility. Under NPPF rules Green Belt boundaries should only be changed in ‘exceptional circumstances’, I do not believe that this can be considered as an exceptional circumstance. As such I believe this is an invalid proposal. I object to this proposed boundary change.

In the Green Belt & Countryside Study and its accompanying Topic Paper, GBC justifies the need to make changes in settlement boundaries in order to meet unfulfilled housing need in the Borough. However, Green Belt rules make it clear that unfulfilled housing need is not normally considered to be ‘an exceptional circumstance’. If it were the entire Green Belt would already be covered in tarmac. The NPPF is clear that every movement in settlement boundaries must be justified by ‘exceptional circumstances’. GBC have offered only a generic justification in their Topic Paper of meeting unfulfilled housing need, but a case by case justification has not been provided. As such, I believe the settlement boundary changes referred to above (and many others) are invalid without such detailed justification.

Paragraph 4.3.17: Proposal to remove Wisley Airfield from the Green Belt

I object to the proposal to remove Wisley Airfield from the Green Belt. The only justification for this proposed change is unfulfilled housing need which is not considered an exceptional circumstance.

POLICY P2: Limited In-filling

A new planning designation has been introduced called ‘the identified boundary of the village’. For East Horsley this covers a number of roads south of the A246. It is a sizeable area, covering 45 hectares, the equivalent of 23% of the present Settlement Area of the village. Within this area, Policy P2 sets out proposals that would allow ‘limited in-filling’ within this boundary.

It is hard to reconcile the opening statement of Policy P2 that “We will continue to protect the Metropolitan Green Belt” with this sizeable reduction in effective Green Belt status. In my opinion, this policy represents a de facto extension of the Settlement Boundary and a substantial reduction in the operational effectiveness of the Green Belt, whose effectiveness is significantly weakened where this new planning designation applies. I object to the proposal to designate roads south of the A246 as being within the ‘identified boundary of the village’ and to allow limited infilling within this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Objections to Draft Local Plan

I wish to object to the Draft Local 2016 Plan to remove the Green Belt villages of Send, Ripley and Clandon from Green Belt status as I believe this is being done for pure expediency.

In a letter by Housing and Planning Minister Brandon Lewis, the Government stated that “demand for housing alone will not change Green Belt boundaries”. Furthermore, National Planning Practice Guidance states that “unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the ‘very special circumstances justifying inappropriate development on a site within the Green Belt’.

I object as I cannot see that the building of houses and an industrial site on the Green Belt at Send at Garlick’s Arch, Clockbarn Nurseries and Send Hill is justified by “any special circumstances”. Green Belt is supposed to be permanent and not continually eroded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11778  Respondent: 10913569 / June Tallon  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Green Belt

We object strongly to virtually any development within the Green Belt. Those who conceived the idea and implemented the necessary laws to create Green Belt around our major cities and towns in 1955 showed foresight and determination that Society, Politicians and vested interests today would be unable and unwilling to commit to. The whole concept of Green Belt land is 'genius' which much of the rest of the world envies us for. It represents only 13% of land in England but its immeasurable benefits have been cherished by all who live and work in its proximity and can only continue to be such an asset if its future is guaranteed for generations to come.

Green Belt is Green Belt and should not be considered as an asset other than as Green Belt, it is irrereplaceable. The laws that protect the Green Belt may well allow for 'Exceptional Cases' but these should be considered in extremis, land taken out of the Green Belt should be replaced elsewhere and in no circumstances should it be sacrificed 'to build houses'
I OBJECT to Send Village being removed from the Green Belt. The Green Belt land in Send comprises of beautiful woodland and fields of long grass which support a rich myriad of wildlife. The Green Belt land not only provides a physical buffer between Send and Guildford to the South and Woking to the North, but even more importantly it is an environmental buffer against traffic pollution and noise, it is the ’lungs’ of Send, helping to combat the air pollution. If Send were to lose the Green Belt to development it would have an irreversible and detrimental effect on the rural aspect of Send Village. The Councillors have reneged on their promise to protect the green belt, and there are no special circumstances to justify building on the green belt. Brown Field sites should be used to fulfill the housing need.

I OBJECT to the proposal of new villages and infilling of existing villages which erodes Green Belt land. In particular in West Horsley, where ‘infilling’ is proposed outside the settlement boundaries. There is no justification for development of green belt when there are sufficient brownfield sites to meet the capacity required. Surrey is the most congested county in the country, and every effort should be made to reduce this by locating new housing needs in areas with adequate road networks and infrastructure.

POLICY P2 – Green Belt
I OBJECT to the proposal of new villages and infilling of existing villages which erodes Green Belt land. In particular in West Horsley, where ‘infilling’ is proposed outside the settlement boundaries. There is no justification for development of green belt when there are sufficient brownfield sites to meet the capacity required. Surrey is the most congested county in the country, and every effort should be made to reduce this by locating new housing needs in areas with adequate road networks and infrastructure.
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<th>Respondent: 10915969 / Lesley Dorran</th>
<th>Agent:</th>
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<td>I object to policy 4.3.13 which removes certain villages from the green belt.</td>
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<td>The green belt is in place to protect our villages from overdevelopment and to retain the rural feel.</td>
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<td>The council have made little effort to keep those affected by this policy well enough informed.</td>
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<td>The infrastructure and road system will not be able to cope with high density infilling within these villages.</td>
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<td>The Localism Act has not been taken into account.</td>
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<td>Rather than spoiling the look and feel of historic villages, which once lost can never be regained, development would be better suited in more urban areas and on brownfield sites.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<tr>
<td>1. There is an excessive amount of housing proposed within the Green Belt. We should be trying to avoid the area becoming just another outer London urban sprawl.</td>
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<td>1. The removal of East and West Horsley from the Green Belt is not acceptable. We should be protecting Green Belt areas and concentrating development on brownfield sites.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<tr>
<td>I am not happy with a number of areas in the new Local Plan and would like to object as follows:-</td>
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<tr>
<td>1. I do not approve of the removal of East and West Horsley from the Green Belt - we should be trying to protect these areas of outstanding natural beauty.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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Comment ID: PSLPP16/11574  Respondent: 10917089 / Maria Schirmer  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT

To the village of Send being removed from Green Belt. Not only because I really feel that the village should retain its rural feel – which after all is why most people chose to move there - but more importantly the green belt ensures Send acts as a very vital buffer between the boroughs of Guildford and Woking. Without this buffer the two run the risk of merging in to one huge city! Ash and Tongham are having new green belt designated just for this reason. As has been pointed out no doubt numerous times, it was an election promise to keep and protect the Green Belt; this proposal of unnecessarily huge development and the removal of the greenbelt goes against everything the people voted for! We voted for you because you said you’d protect the area!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8119  Respondent: 10917537 / Elin Keyser  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I have lived in Horsley for the majority of my life. I am now 22 and have grown-up with the beauty and serenity of what I believed to be green land which would remain so for generations to come. I am not only disappointed at the government’s dismissal of the Green Belt policy – a policy everyone was lead to believe to be permanent - but angered by the lack of alternative solutions proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16181  Respondent: 10917985 / Alan Stephenson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am opposed to the developments on the Green Belt which cannot be justified

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2301  Respondent: 10917985 / Alan Stephenson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Green Belt Protection

If the Council fails to apply Green Belt protection or constrain expansion to reflect widespread, legitimate environmental and transport constraints, the 2017 Plan will cause harm to the qualities that underpin the economic success of Guildford and aggravate congestion.

Land Development

Allocating too much land for development in the 2017 Plan will also result in Guildford being required to provide homes for Woking on our Green Belt which is folly given the constraints in Guildford, a gap town with constricted roads in the Surrey Hills ANOB.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2295  Respondent: 10918273 / Katharine Moss  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Send Business Park being taken out of the Green Belt

It is an old non-conforming user in an area of outstanding natural and beautiful countryside next to the River Wey Navigation.

Vehicular access is highly restricted along Tannery Lane in both directions

Expansion or development at this location detracts from the openness of the Green Belt which is unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6726  Respondent: 10918305 / Susan Butler  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Loss of Green Belt Land: I strongly object to the expansion of the Horsley village boundaries and its subsequent removal including Ripley, Send and Clandon from the Green Belt. The new mayor of London has instructed London planners NOT to approve development on Green Belt Land within the M25. If we continue to build on our countryside it won’t be too long before we have none left. There is insufficient details and/or evidence within the local plan to support why this action is necessary and therefore I strongly object. Our British countryside needs to be preserved along with our wonderful animal, bird and plant life which will be inevitably affected by the erosion of the Green Belt Land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5772  Respondent: 10918369 / Kendall Collinson  Agent:
1. In West Horsley some brownfield sites could be developed such as the Bell and Colvill site. This is ugly and doesn’t serve the local community. The council need to take into account not just the number of houses being built but it’s impact on the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5774  Respondent: 10918369 / Kendall Collinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. Moving The Raleigh school-in theory this is a good idea - I live in Northcote Crescent. But not at the expense of the Green Belt. Most of the children who go to the Raleigh don’t live in the village. I hope that you take into account that the villagers have to live with a decision on this when you look at the responses as the Raleigh school have encouraged all parents to respond and they are not all residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5775  Respondent: 10918369 / Kendall Collinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I think that you need to think very carefully about the aim of what you are trying to achieve if you remove the green belt. There isn’t the infrastructure and people’s lives will be negatively affected if you go ahead. Brownfield sites are one thing but building on open fields will achieve long term problems for which there are no solutions offered by the council.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16638  Respondent: 10918369 / Kendall Collinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

In West Horsley some brownfield sites could be developed such as the Bell and Colvill site. This is ugly and doesn’t serve the local community. The council need to take into account not just the number of houses being built but it’s impact on the village.

Moving The Raleigh school-in theory this is a good idea - I live in Northcote Crescent. But not at the expense of the Green Belt. Most of the children who go to the Raleigh don’t live in the village. I hope that you take into account that the
villagers have to live with a decision on this when you look at the responses as the Raleigh school have encouraged all parents to respond and they are not all residents.

I think that you need to think very carefully about the aim of what you are trying to achieve if you remove the green belt. There isn’t the infrastructure and people’s lives will be negatively affected if you go ahead. Brownfield sites are one thing but building on open fields will achieve long term problems for which there are no solutions offered by the council.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3908  Respondent: 10918497 / Darren Moss  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I strongly object to the following:

1/ I OBJECT to Send Village being removed from the green belt. This was intended to be permanent as required by the National Planning Policy Framework. I cannot see any special reasons why this should be abandoned so recklessly. Green belt is an essential buffer stopping Woking and Guildford becoming one conurbation. Local government gave a very clear election promise to protect the green belt and this goes against this completely. This land will be developed on and lost forever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8290  Respondent: 10918657 / Angus MacDonald  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored

I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/684  Respondent: 10919105 / Susan Thompson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the 2016 Draft Local Plan as follows:-

I object to. All erosion of the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/685  Respondent: 10919105 / Susan Thompson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to. Any "in-setting" i.e. removal of any local villages from the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1286  Respondent: 10919841 / J.A. Millard  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to Policy 2 at paragraph 4.3.15. Guildford Borough Council has not provided evidence for the removal of Send Business Park from the Green belt. Potential development of this area will potentially overwhelm Tannery Lane and the associated country lanes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10102  Respondent: 10920001 / Jeff Doyle  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to all insetting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12865  Respondent: 10920065 / Roz Tacon  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to all insetting of villages from the Green Belt.
We note that the Proposed Submission Local Plan includes the statement “We will continue to protect the Metropolitan Green Belt”. We fully and unequivocally support this policy. However, unfortunately GBC appears to be in breach of this same policy through the housing policies it has set out in the Proposed Submission Local Plan, whereby some 65% of developments will be made on land that is currently Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<tr>
<td>I object to the planned building of 400 houses and the industrial site on the Green Belt at Garlick’s Arch site at Burnt Common, Clockbarn Nurseries and Send Hill because it is not justified by any special circumstances - I understood that Green Belt land is intended to be considered an all but permanent demarcation; it is not meant to be a temporary arrangement subject whims of a local council.</td>
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<th>Comment ID: pslp171/1329</th>
<th>Respondent: 10920961 / Mark Stevens</th>
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<td>Document:</td>
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<td>I object to Policy 2 at paragraph 4.3.15. I do not think Send Business Park should be inset from greenbelt land. It is in a beautiful quiet rural lane in an area of outstanding natural beauty which is why we all have chosen to live and work here. There is highly restricted vehicular access along Tannery Lane in both directions and as it is. This is, and should remain an area of outstanding beautiful countryside adjacent to the Wey Navigation.</td>
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<th>Comment ID: PSLPP16/17006</th>
<th>Respondent: 10921057 / D M Deacon</th>
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<td>I object to the removal of large areas of villages from the Green Belt. I moved to this area because the area was protected by the Green Belt from excessive development. The villages are vital to the health of Guildford as a borough maintaining the rural feel of the borough. Green Belt status should not be removed from any area without full examination of alternative sites to meet the exceptional need of the development. Removing the status removes the requirement to carry out this examination. The character of the villages within Guildford Borough boundary do make a significant contribution to the openness of the Green Belt.</td>
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<th>Comment ID: PSLPP16/100</th>
<th>Respondent: 10921185 / Yvonne Harrington</th>
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I am writing to lodge my objections to the draft local plan 2016.

I object to the removal of villages including Send, Ripley and Clandon from Green Belt. This simply seems to be an attempt to get a foot in the door for future mass scale building which I would advocate is not needed.

I object to any erosion of Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/11874  **Respondent:** 10921633 / Emma Loosley  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the removal of Send from the Green Belt because the village and its countryside provides a necessary buffer between Woking and Guildford.

I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford’s urban brownfield areas much closer to existing transport hubs.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/6282  **Respondent:** 10921921 / V Groves  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Send Village being removed from the Green Belt. The Green Belt was intended to be permanent, as required by the National Planning Policy Framework, and there are no special circumstances to justify abandoning it. Send’s Green Belt provides an essential buffer stopping Woking and Guildford becoming one large conurbation. Local councillors and central government gave a clear election promise to protect the Green Belt and this plan reneges upon that election promise. Developers will be quick to take advantage of the removal of Send from the Green Belt and then there will be nothing to stop further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/16521  **Respondent:** 10921921 / V Groves  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Send Village being removed from the Green Belt. The Green Belt was intended to be permanent, as required by the National Planning Policy Framework, and there are no special circumstances to justify abandoning it.
Send’s Green Belt provides an essential buffer stopping Woking and Guildford becoming one large conurbation. Local councillors and central government gave a clear election promise to protect the Green Belt and this plan reneges upon that election promise. Developers will be quick to take advantage of the removal of Send from the Green Belt and then there will be nothing to stop further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3558  Respondent: 10922017 / Arthur Thomas  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to Send Village, inclusive of Send, Sendmarsh and Burnt Common communities, being removed from the Green Belt and the loss of the protection from development that this I see no special circumstances to abandon this essential space which provides a haven for wildlife, space for outdoor pursuits, green lungs for those who live here and a buffer to the ever outward spread of Guildford and Woking: Local Councillors and the Conservative Government gave a clear election promise to protect the Green Belt and they should be held to this pledge.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12063  Respondent: 10922177 / Paul Knight  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14443  Respondent: 10922177 / Paul Knight  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
2. I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6228  Respondent: 10922689 / Kathleen Grehan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to the Local Plan

I live in the village of Send and I should like to object very strongly to the following issues in the Local Plan:

1. Removing Send from the Green Belt

I object most strongly to the idea of removing Send from the Green Belt. I do not believe that you have the right to do this as Green Belt, by its very definition, is meant to be a permanent feature and protected from property developers. There are no ‘exceptional circumstances’ that require you to remove this status especially when there are a number of undeveloped Brown Field sites in the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6517  Respondent: 10922945 / Toby Meredith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to a new proposed industrial site at Garlick’s Arch (A43). It is not needed and there is already room for the proposed 7,000m2 at Slyfield where it is already set up for industrial purposes.

I object to removing Send, Ripley, Clandon, Galick’s Arch (A43), Wisley Airfield (A35) and Gosdon Farm (A25) all from the Green Belt as it would produce an unwanted urban sprawl. There are no exceptional circumstances for these being removed, as required by the National Planning Policy. A43

I object to GBC not looking at brownfield sites first before trying to develop on Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7655  Respondent: 10923265 / Colin Lewis  Agent:
I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT TO POLICY P2 (GREEN BELT):

- No declaration of support for protecting the Guildford Green Belt, contrary to NPPF and government statements.
- No evaluation of value of local Green Belt as a public and private asset: it’s just treated as potential building land with a few inconvenient restrictions.
- Impact of Green Belt development on local agriculture ignored.
- Impact on rural leisure and tourism ignored.
- Impact on flood control ignored.
- Impact on carbon sink and knock-on effects for air pollution and climate change ignored.
- Impact on biodiversity ignored.
- Impact on natural heritage ignored.
- Impact on water catchment ignored.
- Impact on room for public space amenities (parks, cemeteries, waste facilities etc) ignored.
- Impact on rural business (e.g. mineral mining, film making) ignored.
- Impact on natural landmarks and views ignored.
- Harm to public health and wellbeing (physical, psychological) ignored.
- Allows excessive levels of development in breach of views expressed in last consultation and Conservative Party manifesto commitments at the last local elections.
- Has allowed ruling Councillors to argue that there is an acceptable percentage of Green Belt that should be sacrificed to development, when no such rule exists in the NPPF.
- Ignores alternative approaches, such as fair burden-sharing under which settlements would undertake to accommodate new development in proportion to their size.
- Disproportionate amount of development (most of it, in fact) to be in Green Belt. Too few new homes in urban areas where most people (especially the young and less privileged) want to live. This will act against much needed urban regeneration.
- “Insetting” of most villages disproportionate and unjustified in terms of their contribution under the NPPF to the purposes of the Green Belt. Based on flawed Green Belt and Countryside Study. Idea that most Guildford villages do not contribute to “openness” is subjective.
- Major settlement extensions allow indiscriminate housebuilding, as irregularly shaped villages are squared off to enclose green fields.
- Overall harm to Guildford Green Belt unjustified by any objective development need post-Brexit.
- Ignores most of NPPF 17 stipulations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/11340  Respondent: 10923297 / Matthew Burnham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO ALL POLICIES INVOLVING BUILDING IN THE GREEN BELT:

- No “exceptional circumstances” shown, numbers excessive and the clearly expressed views of residents in previous consultations ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16660  Respondent: 10923745 / Marwan Khalek  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. The building on the Green Belt at Send at Garlick’s Arch, Clock barn Nurseries and Send Hill. This will lead to the erosion of the Green Belt and is proposed without proper justification by any special circumstances.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13123  Respondent: 10924609 / H Perryman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the proposal that new housing be built within the Green Belt. There are plenty of brownfield sites in the borough which should be redeveloped before using fresh sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13126  Respondent: 10924609 / H Perryman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the proposals to remove the villages of Ripley, Send and Clandon and the site of Send Prison from the Green Belt. Also the sites of Wisley Airfield and Garlick’s Arch. National Planning Policy requires exceptional circumstances for the Green Belt boundaries to be changed or for the development within Green Belt. There are no exceptional circumstances for these villages and the land to be removed from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to the continued plan to remove Ripley, and other villages, from the Green Belt. The change to the green belt boundary at Ripley is not sufficient to make it reasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Policy P2:
I object in the strongest possible terms to the removal of Send from Green Belt status and to the proposals to build on the Green Belt fields at Gosden Hill, Garlick’s Arch, Send Hill and Clockbarn Nurseries, particularly Sites A25, A35, A42, A44 and A43. NPPF states that the Green Belt should only be altered in “exceptional circumstances.” There simply are no eligible exceptional circumstances expressed in the Local Plan or supporting documents. Guildford’s urban brownfield areas must be identified and utilised instead, not only to protect our countryside but also to limit the impact on road traffic yet provide much-needed access for new housing to transport links such as the rail network.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I OBJECT to all in setting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to local villages (Send, Ripley, Clandon, Wisley) being removed from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7457  Respondent: 10925217 / AW Winterborne  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to my village that I’ve lived on for decades being removed from the greenbelt, and I’ve heard countless number of times that it would “be protected” and “intended to be permanent” also many politicians/local government have “promised?” to protect the greenbelt, also there’s a “law” that protects the greenbelt like the grade 1-3 listing for old buildings.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13666  Respondent: 10925409 / Tina Higgins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I was for many years a Chair of Governors in both the Primary and Secondary sectors. An issue that engaged much of my time and energy was the selling off of school playing fields; the main thrust of my opposition to such short-sighted action was that once a playing field has been swallowed up up development it can never reclaim its status quo. The proposed Local Plan could amount to the same situation, but on a much larger and potentially more dangerous scale; once Green Belt is gone it is GONE – FOREVER. We neither want nor indeed need an urban sprawl from Guildford up to the M25 which the ‘Vision’ would create. We have areas designated as Green Belt for excellent reasons – the clue is in the name.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1051  Respondent: 10925409 / Tina Higgins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the proposal to inset Send Business Park from the Green Belt because:

- It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation
- There is highly restricted vehicular access along Tannery Lane in both directions
• Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate

I trust that all of these objections, together with those which I submitted when the previous iteration of this Local Plan was made open to comment, will be taken into account when finalising the Local Plan. That final version should simply address the real needs of the community and not merely reflect the desires of developers and land owners.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/8111  **Respondent:** 10925729 / Diana Johnson-Hill  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp171/332  **Respondent:** 10926849 / Nicole Brown  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

57% of new housing proposed is on land that is currently categorised as Greenbelt and this is, quite frankly, shameful as this land was supposed to be protected for future generations

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/3404  **Respondent:** 10927137 / Mary Pargeter  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

GREENBELT

I object to:

• over 70% of new housing being built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
• the removal of the Former Wisley Airfield from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

• the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment as far too This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

• the disproportionate allocation of housing in this particular part of the borough. Over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to Three Farm Meadows, an area that at present has only 0.3% of the population of GBC).

Insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8194  Respondent: 10927201 / David Pinder  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy P2: Green Belt

I object to the proposal to remove West Horsley from the Green Belt. I don not see that any sound case has been made to justify changing the boundaries of the Green Belt. I have read the guidance in the National Planning Policy Framework which makes it clear that Green Belt boundaries should only be altered in exceptional circumstances and that unmet housing need alone is unlikely to qualify as "exceptional circumstances".

Apart from the obvious benefits that the Green Belt designation provides, e.g. protection of our natural environment and good air quality, there are wider social benefits. Without the protection offered by the Green Belt the character of our village would be changed, which will over time lead to a loss of community and could result in West Horsley transforming into another bland commuter town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11859  Respondent: 10927553 / Marion Harris  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Send being removed from the Green Belt, which is meant to save the countryside from being over-run by the nearby towns of Guildford and Woking. Central Government and Local Councillors should honour their promises and not renge on them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT strongly to the proposal to remove the Horsleys (and other villages in the Borough) from the Green Belt. In paras 79 and 80 of the NPPF (National Planning Policy Framework - Mar 12) the Government places great importance on the Green Belts and in Para 83 states that once established they should only be altered in “exceptional circumstances” through the preparation or review of the Local Plan.

The Green Belt around the Horsleys serve all 5 of the purpose set out in para 80.

Para 84 states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

The draft plan does not identify the “exceptional circumstances” required to remove the Horsleys (and other villages) from the Green Belt nor the “very special circumstances” required to build on Green Belt land.

As outlined above, the green belt is not just a pleasant amenity but also an essential protection against flooding.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
which many horseriders, bikers, hikers, people of any age enjoy and love and the habitat of many precious wildlife and plants. Sacrificing the Greenbelt Land and trade it with more traffic, congestion, more pollution, insufficient infrastructures would be a terrible mistake.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future
generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly
protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public
consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the
borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage.
The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken
out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to
justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national
guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional
circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be
taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances
required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered
certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing
exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from
the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be
carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt
in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor
is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than
is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land
rather than brown field sites.

I note that the Summer 2016 edition of “About Guildford” (published by the Council) on page 5 states that "... the Plan
rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider
this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and
the consultation period restarted after the correction has been given the same distribution as the original statement. (I
assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that
the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of
these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that
infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is
too difficult to square off boundaries by including countryside bounded on only one or two sides by existing development,
claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines.
The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this
policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost
calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the
Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I
cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could
quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of
opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their
surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an
untruth.
In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to this plan. Not only has the planned number of proposed houses risen substantially from the draft plan 2014 but more importantly, 65% of new houses are to be built on Green Belt designated land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10236  
**Respondent:** 10930081 / Helen Court  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the erosion of the Green Belt that protects our beautiful villages.

I object to any "in-setting" of any villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4091  
**Respondent:** 10930305 / M.S. Hollins  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the destruction of all Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7818  
**Respondent:** 10930561 / Robert and Gill Churchlow  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Plan is presented in a way that is dishonest in the extreme, even by current political standards. The suggestion that "We will continue to protect the Metropolitan Green Belt" is a complete lie. No less than 65% of the Plan's development will take place on current Green Belt land! Did somebody think we wouldn't notice? This is a totally unacceptable and unnecessary destruction of our countryside and our way of life.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7819  
**Respondent:** 10930561 / Robert and Gill Churchlow  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
The proposal to inset our villages (including our village, East Horsley) from the Green Belt rather than being washed over is completely unacceptable. Our villages make an important contribution to the openness of the Green Belt as is obvious to anyone who takes the time to look for themselves. A very large part of East Horsley is woodland and housing density is extremely low. It is the Green Belt that has preserved the rural character of the village, which is why we choose to live here. The current status has allowed controlled and balanced expansion of the village - why change this?

The proposals to change the settlement boundaries for the village are a blatant attempt to create more land for development. Green Belt boundaries can only be changed in “exceptional” circumstances and a desire to build more houses is certainly not exceptional. The current boundary to the west side of Ockham Road North is defined by a deep drainage ditch which is itself a defensible Green Belt boundary, whose defensibility would in no way be improved if it was moved.

The proposal to take Kingston Meadows out of the Green Belt is equally unjustified and egregious. It provides the main recreational space in the village and the suggestion that it would be developed would be catastrophic for the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10802  Respondent: 10932801 / Angela Grenham  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Green Belt is not the Council’s to give away, it belongs to us all and not just those who live within it, yet the detail of the policy suggests the Council is willing to sacrifice it. There is no commitment within this plan to protect the Green Belt, contrary to the content of the NPPF, party manifesto commitments, government policy and previous responses to public consultations.

There is no assessment of the Green Belt’s value, yet losing it results in an irreversible loss of:

- Agricultural production
- Rural leisure and tourism amenities
- Water catchment & flood control
- Natural heritage
- A carbon sink for air pollution
- Room for public facilities such as parks and burial grounds
- Profitable film locations
- Future economic potential such as mineral extraction
- Biodiversity, natural beauty, landmarks, open space, rural views and sight lines
- Benefits to public health and wellbeing, physical and psychological (as well expressed in the NPPF).

The draft Local Plan suggests that most Guildford villages do not contribute to “openness”, however this is subjective. Indeed, preserving the openness of Effingham is a cornerstone of their emerging Neighbourhood Plan and fits with Paragraph 17 of the NPPF which ‘empowers local people to shape their surroundings’. I am especially concerned by the proposed ‘insetting’ of 14 villages from the Green Belt, and ‘infilling’ 12 of the borough’s Green Belt villages. It is of great concern that settlement boundaries are proposed to be extended in many villages and that infilling is also proposed outside the settlement boundaries of 11 further villages. To ‘inset’ two thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is completely inappropriate, given the stated objectives of the Green Belt in the NPPF and government policy. No exceptional circumstances have been disclosed, and therefore the Green Belt boundaries should NOT be changed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1706  Respondent: 10933793 / Julia Tilbury  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY P2- Green Belt

I OBJECT. This policy states, "the general extent of the Green Belt has been retained." This is a lie.

The policy wording is tepid in support of the Metropolitan Green Belt even though the latter forms 89% of the borough and should be the cornerstone of all local planning policy. It is precious beyond the short-term demands of the present
Government's policy or a 15-year local plan. As noted under Policy S1 above, it is a solemn legacy to future generations - an asset and amenity that belongs as much to Londoners and the whole nation as to the people who live in it. It is an inalienable public good. Once gone it is gone forever. It is not the Council's to give away.

Policy P2 omits any assessment of the Green Belt's value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. Building on it involves high opportunity costs, including an irreversible loss of:

- Agricultural production
- Rural leisure and tourism amenities
- Water catchment
- Flood control
- Biodiversity
- Natural heritage
- A carbon sink for air pollution
- Room for public facilities such as parks and burial grounds
- Profitable film locations (e.g. Shere)
- Future economic potential such as mineral extraction (even tracking)
- Natural beauty, landmarks, open space, rural views and sight lines
- Benefits to public health and wellbeing, physical and psychological (as well expressed in the NPPF)"6

As a matter of law, morality and national and local policy, these assets should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultations.

It is disreputable to argue, as the Council do, that the plan would involve the loss of "only" 1.6% of the borough's Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no "acceptable" percentage (in the NPPF or anywhere else) of Green Belt that may be sold. No-one argues that we should sell 1.6% of the Crown jewels in order to build houses.

I am not opposed to appropriate development in the Green Belt and recently supported a major planning application in my own village. But I fail to see why a system of fair burden-sharing of new development cannot be applied to the borough's existing settlements in proportion to their size. This alternative would minimise the strain on infrastructure and maximise the chances of retaining the character of each settlement through gradual growth. It is reasonable to ask urban Guildford, with x times the population of semi-rural East Horsley for instance, to accommodate x times the number of new homes over the plan period. Parish councils could be asked, and will no doubt be willing, to propose where their quota of houses should go. Most rural residents are reasonable people who, if not alienated by top-down planners, will support realistic numbers of new houses in their neighbourhoods. Unfortunately, this democratic, bottom-up approach has not been attempted.

Instead, while developers flip and land-bank urban sites as a financial speculation, this plan will dump most new development on greenfield sites where building costs are lower, covering the Green Belt with dozens of housing estates that few residents want. 8,086 new houses are planned for the Green Belt but only 1,135 for Guildford urban area. This is disruptive, socially inequitable and unnecessary. It will not only destroy countryside but will also delay and disincentivise much-needed urban regeneration. The remarkable revival and repopulation of central London shows that building dormitory satellite settlements is an out-of-date approach to planning.

I particularly protest at the "insetting" of 14 villages from the Green Belt, and at "infilling" 12 of the borough's Green Belt villages. I am deeply disturbed that settlement boundaries are to be hugely extended in many villages and that infilling is also proposed outside the settlement boundaries of 11 further villages . Many Guildford villages are "leggy" in outline, reflecting the effect of ribbon development (often along just one side of existing roads) permitted between the Wars. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the "openness" of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF's other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost hellbent on self-defeat.
I believe this policy is based on a flawed Green Belt and Countryside Study that, according to one Conservative Councillor, was irregularly commissioned by Council officers without the authority of Councillors. To "inset" two-thirds of the borough's rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough's location on the edge of Metropolitan London.

"8 See Ministerial foreword: "Our natural environment is essential to our wellbeing, and it can be better looked after than it has Habitats that have been degraded can be restored. Species that have been isolated can be reconnected. Green Belt land that has been depleted of diversity can be refilled by nature and opened to people to experience it, to the benefit of body and soul."

"9 Councillor Matthew Sarti, Planning Committee meeting, 18 May 2016.

cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, although they would quickly destroy them if the proposed "insetting" and boundary extensions go ahead. This policy is wildly disproportionate in terms of any foreseeable development need (especially post-Brexit) and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17's aim of "empowering local people to shape their surroundings" and other NPPF provisions."

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/1727</th>
<th>Respondent: 10933793 / Julia Tilbury</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

SITES

1. Green Belt sites

I OBJECT to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that "allocating these sites does not grant planning permission for development, however, it does identify the principle of development and uses." This ignores the tens of thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. This amounts to a war of attrition by the Council in conjunction with developers, since many busy residents are sick and tired of repeating the same comments to deaf ears. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. Some residents have concluded that commenting is a waste of time.

"13 Further discredited by criminality on the Council. Former lead Councillor for planning Monkia Juneja, architect of the 2014 draft plan, is currently serving a two-year sentence on 3 counts of forgery, pretending to be a barrister and obtaining dishonest pecuniary advantage.

All Green Belt sites should be removed from the plan until "exceptional circumstances" for development are proven, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. "14

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>Comment ID: PSLPP16/1678</th>
<th>Respondent: 10933857 / C J Tilbury</th>
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</tbody>
</table>
POLICY P2- Green Belt

I OBJECT. This policy states, "the general extent of the Green Belt has been retained." This is a lie.

The policy wording is tepid in support of the Metropolitan Green Belt even though the latter forms 89% of the borough and should be the cornerstone of all local planning policy. It is precious beyond the short-term demands of the present Government's policy or a 15-year local plan. As noted under Policy S1 above, it is a solemn legacy to future generations - an asset and amenity that belongs as much to Londoners and the whole nation as to the people who live in it. It is an inalienable public good. Once gone it is gone forever. It is not the Council's to give away.

Policy P2 omits any assessment of the Green Belt's value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. Building on it involves high opportunity costs, including an irreversible loss of:

- Agricultural production
- Rural leisure and tourism amenities
- Water catchment
- Flood control
- Biodiversity
- Natural heritage
- A carbon sink for air pollution
- Room for public facilities such as parks and burial grounds
- Profitable film locations (e.g. Shere)
- Future economic potential such as mineral extraction (even tracking)
- Natural beauty, landmarks, open space, rural views and sight lines
- Benefits to public health and wellbeing, physical and psychological (as well expressed in the NPPF)

As a matter of law, morality and national and local policy, these assets should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultations.

It is disreputable to argue, as the Council do, that the plan would involve the loss of "only" 1.6% of the borough's Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no "acceptable" percentage (in the NPPF or anywhere else) of Green Belt that may be sold. No-one argues that we should sell 1.6% of the Crown jewels in order to build houses.

I am not opposed to appropriate development in the Green Belt and recently supported a major planning application in my own village. But I fail to see why a system of fair burden-sharing of new development cannot be applied to the borough's existing settlements in proportion to their size. This alternative would minimise the strain on infrastructure and maximise the chances of retaining the character of each settlement through gradual growth. It is reasonable to ask urban Guildford, with x times the population of semi-rural East Horsley for instance, to accommodate x times the number of new homes over the plan period. Parish councils could be asked, and will no doubt be willing, to propose where their quota of houses should go. Most rural residents are reasonable people who, if not alienated by top-down planners, will support realistic numbers of new houses in their neighbourhoods. Unfortunately, this democratic, bottom-up approach has not been attempted.

Instead, while developers flip and land-bank urban sites as a financial speculation, this plan will dump most new development on greenfield sites where building costs are lower, covering the Green Belt with dozens of housing estates that few residents want. 8,086 new houses are planned for the Green Belt but only 1,135 for Guildford urban area. This is disruptive, socially inequitable and unnecessary. It will not only destroy countryside but will also delay and disincentivise much-needed urban regeneration. The remarkable revival and repopulation of central London shows that building dormitory satellite settlements is an out-of-date approach to planning.
I particularly protest at the "insetting" of 14 villages from the Green Belt, and at "infilling" 12 of the borough's Green Belt villages. I am deeply disturbed that settlement boundaries are to be hugely extended in many villages and that infilling is also proposed *outside* the settlement boundaries of 11 further villages. Many Guildford villages are "leggy" in outline, reflecting the effect of ribbon development (often along just one side of existing roads) permitted between the Wars. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the "openness" of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF's other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost hellbent on self-defeat.

I believe this policy is based on a flawed Green Belt and Countryside Study that, according to one Conservative Councillor, was irregularly commissioned by Council officers without the authority of Councillors.9 To "inset" two thirds of the borough's rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough's location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, although they would quickly destroy them if the proposed "insetting" and boundary extensions go ahead. This policy is wildly disproportionate in terms of any foreseeable development need (especially post-Brexit) and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17's aim of "empowering local people to shape their surroundings" and other NPPF provisions.10

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/1699  **Respondent:** 10933857 / C J Tilbury  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**SITES**

1. *Green Belt sites*

I OBJECT to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that "allocating these sites does not grant planning permission for development, however, it does identify the principle of development and uses." This ignores the tens of thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. This amounts to a war of attrition by the Council in conjunction with developers, since many busy residents are sick and tired of repeating the same comments to deaf ears. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014.13 Some residents have concluded that commenting is a waste of time.

"13 Further discredited by criminality on the Council. Former Lead Councillor for planning Monika Juneja, architect of the 2014 draft plan, is currently serving a two-year sentence pm 3 counts of forgery, pretending to be a barrister and obtaining dishonest pecuniary advantage.
All Green Belt sites should be removed from the plan until "exceptional circumstances" for development are proven, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. "14

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11183  Respondent: 10934433 / Ömer and Sally Kirsan  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Areas of Outstanding Natural Beauty and the Green Belt are being deliberately ignored. These beautiful views will be gone forever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11368  Respondent: 10934497 / Paula Heard  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

No exceptional circumstances have been demonstrated to remove the Horsleys from the Green Belt Traffic and parking - the impact on local roads would be tremendous. Stations and shopping areas are already at a maximum.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11377  Respondent: 10934497 / Paula Heard  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Loss of GREEN BELT Sadiq Khan has instructed planners not to approve development on Green Belt within the M25. If we continue to abuse it there will be one left.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15363  Respondent: 10935201 / Cathryn Walton  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT. This policy is tepid in support of the Metropolitan Green Belt even though it constitutes 89% of the borough and should be the cornerstone of all local planning policy.

It is precious beyond the short-term demands of the present Government’s policy or a 15-year local plan. As noted under Policy S1 above, it is a solemn legacy to future generations — an asset and amenity that belongs as much to Londoners and the wider nation as to the people who live in it. It is not the Council’s to give away, and once it is gone it is gone forever.

Any policy on the Green Belt should start with a fair assessment of its value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. Building on it involves high opportunity costs, including an irreversible loss of:

- Agricultural production
- Rural leisure and tourism amenities
- Water catchment
- Flood control
- Biodiversity
- Natural heritage
- A carbon sink for air pollution
- Room for public facilities such as parks and burial grounds
- Profitable film locations (e.g. Shere)
- Future economic potential such as mineral extraction (even fracking)
- Natural beauty, landmarks, open space, rural views and sight lines
- Benefits to public health and wellbeing, physical and psychological (as well expressed in the NPPF) 8

As a matter of law, morality and national and local policy, these assets should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation.

It is disreputable to argue, as the Council does, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. No-one argues that we should sell 1.6% of British Museum artefacts in order to build houses.

I am not opposed to appropriate development in the Green Belt and recently supported a major planning application in my own village. But I fail to see why a system of fair burdensharing of new development cannot be applied to the borough’s existing settlements in proportion to their size. This would minimise the strain on infrastructure and maximise the chances of retaining the character of each settlement through gradual growth. It is reasonable to ask urban Guildford, with x times the population of semi-rural East Horsley for instance, to accommodate x times the number of new homes over the plan period.

Parish councils could be asked, and would no doubt be willing, to propose where their quota of houses should go. Most rural residents are reasonable people who, if not alienated by top-down planners, will support realistic numbers of new houses in their neighbourhoods. Unfortunately, this democratic, bottom-up approach has not been attempted.

Instead, while developers flip and land-bank urban sites as a financial speculation, this plan will dump most new development on greenfield sites where building costs are lower, covering the Green Belt with dozens of housing estates few residents want. 8,086 new houses are planned for the Green Belt but only 1,135 for Guildford urban area. This is disruptive, socially inequitable and unnecessary. It will not only destroy countryside but will also delay and disincentivise much needed urban regeneration. The remarkable revival and repopulation of central London shows that building dormitory satellite settlements is an out-of-date approach to planning.

I particularly protest at the “insetting” of 14 villages from the Green Belt, and at “infilling” 12 Green Belt villages. I am deeply disturbed that settlement boundaries are to be hugely extended in many villages and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are “leggy” in outline, reflecting the effect of ribbon development (often along just one side of existing roads) permitted between the Wars. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines.

The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost hellbent on securing the rejection of the plan as a whole.

I believe this policy is based on a flawed Green Belt and Countryside Study that, according to one Conservative Councillor, was irregularly commissioned by Council officers without the authority of Councillors. 9 To “inset” two-thirds of the borough’s 9 rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, although they would quickly
defeat them if the proposed “insetting” and boundary extensions go ahead. This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions. The policy states that “the general extent of the Green Belt has been retained.” This is not true.

8 See Ministerial foreword: “Our natural environment is essential to our wellbeing, and it can be better looked after than it has been. Habitats that have been degraded can be restored. Species that have been isolated can be reconnected. Green Belt land that has been depleted of diversity can be refilled by nature – and opened to people to experience it, to the benefit of body and soul.”

9 Councillor Matthew Sarti, Planning Committee meeting, 18 May 2016.

10 See footnote 3 above.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11864  Respondent: 10937025 / Louise McGowan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Send Village being removed from the Green Belt. The Green Belt was intended to be permanent, as required by the National Planning Policy Framework. The proposal to remove Send from the Green Belt would destroy the personality and fabric of the village and those around it and the lifestyles and amenity of the residents and wildlife.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14386  Respondent: 10938241 / Alan Brockbank  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the removal of Send from the Green Belt. The Green Belt was intended to be permanent. This generation looking after the interests of those future generations. There are no special circumstances to justify abandoning it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/18351  Respondent: 10939169 / Anna Waldner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.
Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I object to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council's to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation.

Paragraph 4.3.16 only states that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified within the local plan. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise.

Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council's growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that "allocating these sites does not grant planning permission for development." However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether "exceptional circumstances" existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as well as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as III as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless "exceptional circumstances" for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-tenn considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13993  Respondent: 10941057 / Tim Green  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the erosion of the Green Belt in clear contravention of the Government’s and Conservative councillors’ election manifesto promises to protect the Green Belt. In particular, I object to Send being removed from the Green Belt (Policy P2) as Send provides a buffer between Woking and Guildford.
I object to the insetting of Ripley.

I object to the insetting of West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/37  **Respondent:** 10942017 / Jason Fenwick  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing to strongly object to the revised GBC local plan for the following reasons.

1. **Policy P2. Removal of Send from the Green Belt.** In the new local plan document on page 29 Send is referred to as a "Rural Local Centre" yet the plan suggest removing the green belt along the banks of the River Wey Navigation, Garlick's Arch and around the village school. The local area is already very busy and congested, and we need to preserve the "village feel" in these rural areas for the sake of existing residents and their children as well as anyone looking to move to the area, part of the charm of the villages surrounding Guildford is that you can live in areas with outside green spaces with the benefit of having a large town centre close by. The removal of Green Belt status will open the door to more planning applications to greedy private land owners to "fill in" these current Green Belt spaces if you change the status of these leaving them exposed. For these reasons I very strongly object to these proposed changes and we will do everything we can to stop them happening.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/2749  **Respondent:** 10942081 / G J Teague  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

3. **Removal of the Horsleys from the Green Belt (Policy P2 Green Belt)**

I object to this policy.

The draft plan proposes that the Horsleys be removed from the Green Belt. The NPPF (Para 83) requires any change of Green Belt Boundaries to demonstrate exceptional circumstances. The Written Ministerial Statement of 1st July 2013 clarified that the single issue of unmet housing need is unlikely to outweigh the harm to the Green Belt necessary to constitute such exceptional circumstances. The Plan states (Policy P2 para 4.3.16) "We consider exceptional circumstances exist to justify the amendment of Green Belt boundries in order to facilitate the development that is needed and promote sustainable patterns of development". No objective evidence is offered of any exceptional circumstances justifying the Horsleys' removal from, and thus permitting intensive development in, the Green Belt.
Further, Policy P2 states (para 4.3.19) that a Green Belt Supplementary Planning Document is being prepared, and that this document will provide further detail and guidelines to help inform development proposals. It is unacceptable that a policy of this sensitivity be promoted for final consultation without this detail.

The Plan is therefore not only non-compliant with the NPPF, but has not been positively prepared.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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7. Extension of the East Horsley village boundary

I object to this proposal.

The plan proposes that the area south of the A246, including the Warren, be included within the newly proposed "village boundary". This is unacceptable. Not only was this proposal not included in the earlier version of the plan put out for consultation in 2014, but no explanation is offered of the intended planning effect of this designation. The A246 is an obviously defensible boundary for the Green Belt. There appears to be no obvious purpose for creating this new village boundary other than a subterfuge to enable a future in setting of this area. No justification exists for removing the area south of the A246 from the Green Belt. The proposal is therefore in breach of the NPPF (para 83.)

This area south of the A246 has a true semi-rural character, evidenced by generous plot sizes, wide separations between dwellings and a uniformly lower density than that obtaining in the currently defined settlement area of East Horsley. All previous development in this area has (rightly) had to be consistent with maintaining the openness of the Green Belt, and ending this status would wreck its character and amenity. Even if it were to be accepted (which it is not - cf above) that the built environment within the existing settlement boundary of East Horsley was out of character with the overall openness of the Green Belt, this clearly is not true of the area south of the A246, which accordingly, should continue to be included in the Green Belt. To conclude otherwise would be to legitimate an obvious future "land grab" designed to enable wholly inappropriate development to the deep detriment of the existing residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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8. Infilling (Policy P) Green Belt

I object to this policy.
Not only are the Horsleys to be removed from the Green Belt (cf above), but infilling is to be allowed within the identified settlement boundaries of "East Horsley (south)", as well as outside the inset boundaries, where it can be demonstrated that the site is as a matter of fact on the ground within the village (sic).

To the extent applicable to the area south of the A246, this proposal is completely unacceptable. Per the Council's own Guildford Borough Council Green Belt and Countryside Study Vol IV at para 13.13 the area south of the A246 is classified as a low development density. The infilling of "gaps", or "small-scale redevelopment of existing properties" (para 4.3.25 ff) in this area would utterly compromise the existing low density, and create a self fulfilling rationale for later formal insetting. This is little short of legalised vandalism.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to the removal of Send from the Green Belt.
I object to the building on the Green Belt at Send at Garlick's Arch, Clockbam Nurseries and Send Hill because all the development that is really needed can be accommodated in Guildford's urban brownfield areas much closer to existing transport hubs.
I object to the proposed new interchange onto the A3 at Burnt Common because it would be disastrous for Send and the (A247) would be gridlocked all day.
I object to the proposed new interchange onto the A3 at Burnt Common because the Transport Evidence is incomplete and unreliable and shows there will be congestion because Send would be used as a cut through to the A3/M25.
I object to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially.
I object to the development at Garlick's Arch for 400 houses because it was sprung on the village at the last moment with only 2 weeks' notice and without any prior consultation and is not required in terms of housing need either for the village or the borough.
I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Comment ID: PSLPP16/5562  Respondent: 10942433 / Brenda Ottaway  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Comment ID: PSLPP16/433  Respondent: 10943265 / Barbara Ward  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to all erosion of the Green Belt, since this is the only safeguard from further air pollution.

I object to any "insetting" (i.e. removal) of any villages from the Green Belt. I object to the disproportionate amount of development in one area of the Borough. I object to the lack of any evidence for the alleged housing need numbers. I object to the last minute inclusion of new sites with less than two weeks notice. I object to the limited consultation period.

Once the Green Belt is lost... it gone for ever. The Conservative election mandate was to SAVE THE GREEN BELT.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9722  Respondent: 10943265 / Barbara Ward  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Comment ID: PSLPP16/9269  Respondent: 10943457 / Henry Benzikie  Agent:  

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

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circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

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This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

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GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.
Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

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Attached documents:

Comment ID: PSLPP16/9270  Respondent: 10944161 / Stephen Benzikie  Agent: 

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I therefore object to the "Planning moves to build over Burnt Common and other areas surrounding Send.marsh." This will greatly affect the clay's natural structural. In effect: by concreting over the Green Belt fields, which are the collection points for rain water. This waters percolate down into the ground resulting in ground water. In other words; it's this water which keeps the clay in a state of balance and the structures that now sit on it.

**TO SWIM: due to Flooding**

Sendmarsh is on the cuff of flooding.

Throughout the area, East Clandon Stream flows. Water flows passed Send.marsh at depth of 2 to 3 inches & upwards of 10 to 12 feet.

A flood barrier was put in place around Send.marsh in 2006-8. In winter 2014/15, water levels were within 2 feet from the top of this barrier. Having Burnt Common along with the surrounding areas; concreted over: will increase water run-off into the East Clandon Stream making flooding inevitable & repetitive.

The double whammy comes from both of the above and will result in: -

1. Home Insurance costs rising due to:
   1. Long term subsidence's problems.
   2. Short & long term flooding issues.
2. Property values for Send Marsh will drop.

Until all these issues are fully resolved and solutions put in place, both politically & technically; no planning approval should be given.

I object to; tweaks in the local highways infrastructure; which will not match the vast increases in motor transport; caused by this "Massive Proposed Development."

This Local Plan does not come close to any relevant meaning of word "Plan," in fact it only reflects gloss of a politics!

I object totally to The Local Plan because, it does away with the "Green Belt" It also tramples over most, if not all, of the current & future, electorates' wishes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/13718</th>
<th>Respondent: 10946177 / Graeme Verra</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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**GREEN BELT**

The Green Belt was established principally to protect London and the south east area from unrestricted urban spread. This has been successful and ensured that historic towns and villages have largely retained their distinctive nature. Perhaps most critically, it provides a safeguard to the countryside which is increasingly under threat. Having the Green Belt provides both recreational opportunities for people living in the surrounding urban areas as well as being the lungs of our ever increasingly built up environment. We are stunned that when we are placing globally such a high priority on what is happening to our environment that nothing short of vandalism of the Green Belt is being considered. Nearly two thirds of the proposed developments will be made on Green Belt land.

The Green Belt must remain intact with its existing boundaries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I wish to make the following objections to the local plan

1. **Not protecting the Green Belt**
   I object to the proposals to remove Ripley, Send and Clandon from the Greenbelt. There are absolutely no special circumstances to do this. Once taken the green belt is lost forever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

1. I object removing Send Business Park from the Green Belt (4.3.15).
   Send Business park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for it’s insetting (removal) from the Green Belt, and indeed GBC have not even attempted one. Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<th>Comment ID: PSLPP16/83</th>
<th>Respondent: 10949921 / Jan Parker</th>
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1. **Not protecting the Green Belt**
   I object to the proposals to remove Ripley, Send and Clandon from the Greenbelt. There are absolutely no special circumstances to do this. Once taken the green belt is lost forever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/6463</th>
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1. **Disproportionate size of sites in relation to rural locations**
   I object to the allocation of land to the strategic sites of Wisley Airfield AGAIN!!!, Garlicks Arch (Ripley/Send border) and Gosden Hill (Clandon). The proposed development of these sites will have a disproportionate impact on the surrounding local villages. They will have a permanent impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/6472</th>
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I object to not protecting the Green Belt (Policy P2) I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43) There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: pslp171/536  Respondent: 10949921 / Jan Parker  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the extended development in the Green Belt (Policy P2, Site A43)

I object to Garlick’s Arch (A43) being extended and the resulting urban sprawl. There are no exceptional circumstances for this site being removed from the Green Belt, as required by the National Planning Policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Comment ID: PSLPP16/12383  Respondent: 10950273 / Stuart McDonald  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the draft Local Plan for the following key reasons:

• I object to a plan for the building a disproportionate amount new housing within the Green Belt. Why is Brownfield land not be considered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Comment ID: PSLPP16/12512  Respondent: 10950273 / Stuart McDonald  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

• I object to a plan for the building a disproportionate amount new housing within the Green Belt. Why is Brownfield land not be considered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/5612  Respondent: 10950561 / Jeanette Pell  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11594  Respondent: 10951105 / Richard Bray  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Proposal to remove the Horsleys from the Green Belt – the exceptional circumstances required before taking this action have not been demonstrated

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11597  Respondent: 10951105 / Richard Bray  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Extension of the boundaries of the Settlement areas of the Horsleys – No sound reasons have been given for the proposed changes, which seem to be aimed solely at increasing the land available within the settlements for future additional development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10367  Respondent: 10951489 / Lorna M Cave  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I write to object to the sudden change of the local plan allowing no time for Send to be consulted. It is very different to the previous consultation in 2014.

I object, most strongly, to Send being taken out of the Green Belt. There is no justification for this and it will result in Woking and Guildford becoming one huge conurbation. There are plenty of brownfield sites that should be used first and NOT the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<th>Comment ID: PSLPP16/12029</th>
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<td>No good valid reasons have been given for removing the Horsley’s from the Green Belt designation, and we object to that.</td>
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<td>As a general comment the extent of the proposed sites and settlement boundaries have been too much influenced by existing land ownerships. As a consequence, in too many cases parts of the proposed developments stick out into the Green Belt beyond the existing or natural settlement boundaries</td>
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<th>Comment ID: PSLPP16/8187</th>
<th>Respondent: 10952129 / Nick Green</th>
<th>Agent:</th>
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<td>I am strongly opposed to the removal of West Horsley from the Green Belt. It is this protected open space which gives West Horsley much of its character. The removal of this protection will have a significant adverse effect on the nature of the village and ultimately lead to a conurbation stretching all the way from Leatherhead to Guildford. I do not believe that the current circumstances warrant any change in the Green Belt status here in West Horsley. The urbanisation that would follow removal of Green Belt status would be completely at odds with the village as it is now. The potential development of around 500 homes on Green Belt land in this parish would be out of all proportion to the existing community and its infrastructure. The nature of such housing developments, by virtue of their type and density, would markedly change the character of West Horsley.</td>
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<th>Comment ID: pslp171/1730</th>
<th>Respondent: 10952161 / Alison Humberstone</th>
<th>Agent:</th>
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I object to the proposal to inset Send Business Park from the Green Belt. Its in the greenbelt, clear and simple. Further, Tannery Lane is a small rural lane with poor access and it simply cannot accommodate more traffic. Traffic is already a nightmare and anyone who uses the lane knows that. Its cannot take more and the village cant take more. Once again, you just seem determined to find ways to bypass Green belt protection (despite the fact its clearly within and surrounded by greenbelt) and it is unacceptable. If you are able to get this through it simply opens up the option for further development, and further (irrevocable) destruction of the greenbelt you should be protecting. GBC needs to step up and stop ANY intrusion or impact to the greenbelt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3038  Respondent: 10952705 / Moira Maidment  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council's to give away and once it is gone it is gone forever . Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of "only" 1.6% of the borough's Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an "acceptable" percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council's growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers' hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I
I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the "insetting" of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to include them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the "openness" of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF's other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To "inset" two-thirds of the borough's rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough's location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed "insetting" and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17's aim of "empowering local people to shape their surroundings" and other NPPF provisions.

Paragraph 4.3.17 states that "the general extent of the Green Belt has been retained." I believe this should be deleted as an untruth.

In addition I object to the proposals to remove from the Green Belt the so called 'strategic sites' of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick's Arch (A43) and all other strategic sites.

National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a 'special circumstance') to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC's Green Belt & Countryside Report does not address Garlick's Arch, so there is no evidence base to support including this site.

Rather than developing Garlick's Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object to all strategic sites proposed in the draft Plan to be built in the Green Belt.
1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or
other. The plan says that “allocating these sites does not grant planning permission for development.” However,
each of the sites will be removed from the Green Belt and will be available in principle for development and
non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for
the thousands of detailed comments the Council have received about individual sites ever since the
Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its
first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly
conducted.

1. The housing needs assessment is flawed in various respects and overstates housing. In addition since it was
produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the
previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to
consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

1. Having determined housing need the Council was entitled to consider constraints before determining the housing
number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to
constraints. The scarcity of sites outside the Green Belt as Ill as its infrastructure (most notable roads)
considerations all represented constraints which should have been taken into account in determining the final
housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First
I believe constraints should have been applied. Secondly I believe the Council did not properly consider
constraints and that their decision making process was flawed and thus subject to being set aside by the
Inspector.

1. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt
sites should not be included in the plan unless “exceptional circumstances” for development are proven in
relation to that specific site, as stipulated repeatedly in the N

The Green Belt should trump short-term considerations such as perceived housing need, as case law has established.
There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt
against the very special circumstances which are

argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have
appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt
then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at
will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt.
There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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**Comment ID:** PSLPP16/8847  **Respondent:** 10953793 / Hugh Thomas  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I OBJECT to the Local Plan because it seeks to build on Green Belt land unnecessarily. The work of Professor Anne Power at the London School of Economics, amongst much other expert research, clearly demonstrates that there is more than sufficient land to build all the houses that are needed without taking any of the Green Belt. In our area several studies show that unused brownfield sites in Guildford Town itself are capable of yielding most of the required land. GBC has not properly explored the capacity which is available there or on brownfield sites elsewhere in the borough, which would have provided a sensible starting point since GBC own many of them.

I OBJECT to the Local Plan in that GBC’s approach to the Green Belt introduces a concept of grading its quality. This is an alien concept, not recognised in law. Of course some Green Belt is seen to be better than other Green Belt but the law does not make any distinction, nor should it. It depends who is looking at it and from what standpoint they are looking. Green Belt is Green Belt and it is not for GBC to stand in judgement on what bits it thinks are worth keeping and what are not.

I OBJECT to removing Send and other villages from the Green Belt. The Green Belt was intended to be permanent, and its permanence was enshrined in law through the National Planning Policy Framework, reinforced by the NPPG and a succession of Ministerial guidance statements. For all of this to be overridden requires “special circumstances” which do not exist in the case of Send.

I OBJECT to all four proposed sites in Send because they are all in the Green Belt and not one of them displays the very special circumstances which would be needed in order to outweigh the substantial harm caused by reason of inappropriateness.

I OBJECT to any sort of diminution of Send’s Green Belt because it provides an essential buffer stopping Woking and Guildford becoming one conurbation. It has served this purpose effectively since its inception and should continue doing so for the benefit of subsequent generations living here. No group of councillors, especially without a mandate, has the authority to impose a different future on residents.

I OBJECT to any reduction in Send’s Green Belt because so much land in Send provides the setting for the beautiful Wey Navigation corridor, which is a conservation area that enhances biodiversity, is visually important, provides a valuable leisure facility and combined with the surrounding lakes an exceptional habitat for a wide range of bird species and other wildlife.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I OBJECT to this policy:

Comments: Asserting unmet housing need is not an argument for building on green belt land. Much of this land is farmland, burying it under tarmac, is an insane policy when food security is precarious and may become more so, it would be negligent not to consider the needs of future generations. The sacrifice of green belt to produce commuter dormitories cannot be justified. The attempt to justify building on Green Belt ‘in order to facilitate the development that is needed’ is vague and not supported by guidance from Nick Boles office.

It is disingenuous to move to remove villages from the Green Belt, encourage development and then state that only 1.6% of the borough’s Green Belt will be lost. The extreme elasticity of the definition of ‘permanently’ and ‘permanence’ expressed in this document is reminiscent of Alice in Wonderland

“When I use a word,” Humpty Dumpty said, in rather a scornful tone, “it means just what I choose it to mean—neither more nor less.” “The question is,” said Alice, “whether you can make words mean so many different things.” “The question is,” said Humpty Dumpty, “which is to be master—that's all.” – I would recommend that the authors of the Draft Plan seek guidance from the Oxford English.

Taking Ripley and Send, and other villages out of the Green Belt is completely unacceptable and paves the way for destruction of the Villages in perpetuity, to inflict this burden on residents who live in the Villages and impact the historic and unique quality of the area itself.

The next policy comments reflect my concern that sites are identified for development without attention being paid the overall impact on the local area, the contribution to creating a single highly urbanised area where there were villages of individual character and charm.
I object to the proposed development at Wisley airfield due to environmental impact and destruction of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/18307</th>
<th>Respondent: 10954849 / David Hayward</th>
<th>Agent:</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy P2 – Green Belt: I OBJECT to this significant erosion of the Green Belt with the proposals for large towns being developed on Green Belt land thereby removing the openness of the Green Belt. The huge developments proposed for the North East quadrant of the borough (Wisley Airfield, Gosden Hill Farm, various farms and tracts in the Horsleys and Garlicks Arch at Send) will have a severely detrimental effect on the amenity of the area.

I OBJECT that Policy P2 is not met where it states that Green Belt should be protected. I object to the disproportionate use of Green Belt land for housing – some 65% of the housing proposed is on Green Belt, with little consideration being given to redevelopment of brown field sites.

I OBJECT to the changes to Green Belt boundaries. This is not justified by any very special circumstances. All the Green Belt sites meet the five purposes of the Green Belt.

I OBJECT to building on the Green Belt because the essential characteristic of Green Belt is its openness and permanence (National Planning Policy Framework paragraph 79).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/18311</th>
<th>Respondent: 10954849 / David Hayward</th>
<th>Agent:</th>
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<tbody>
<tr>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT that GBC are contravening the NPPF framework stipulation in paragraph 87 with the proposed developments at Gosden Hill Farm, East and West Horsley and Garlicks Arch, Send. Paragraph 87 states “As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.” All of the proposed developments are out of proportion to the surrounding area and none qualify for the exceptional circumstances required to take them out of the Green Belt.

I OBJECT specifically to the proposed building on Gosden Hill Farm on Green Belt designated to prevent West Clandon being absorbed into a sprawling urban environment. The proposed development would be four times the size of the village and is completely disproportionate and unjustified.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
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<tr>
<th>Comment ID: PSLPP16/5912</th>
<th>Respondent: 10956161 / Pauline McCallister</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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</table>

1. I object to not protecting the Green Belt
   I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl.

   There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

   The Plan should develop the existing brownfield sites at Burnt Common rather than developing Garlick’s Arch (A43).

   **What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

   **Attached documents:**

<table>
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<tr>
<th>Comment ID: PSLPP16/16729</th>
<th>Respondent: 10956161 / Pauline McCallister</th>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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</table>

   I am writing to Guildford Council to express my great concerns on the proposed development of the Green Belt in Surrey.

   What give's you the right to remove this land from the green belt?

   **The NPPF (National Planning Policy Framework) makes it clear that the fundamental aim of the Green Belt policy is to prevent urban sprawl by keeping land permanently open.**

   **It also explicitly states that once established Green Belt boundaries should only be altered in exceptional circumstances.**

   **There are no exceptional circumstances!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!**

   **The whole point of the Green Belt is to stop urban sprawl, your destroying the Green Belt to extend urban sprawl? Insane!**

   Green Belt Guidelines enclosed as it's obvious you haven't read them.

   The UK has voted to leave the EU, so 2.9 million people will be leaving soon, so no reason for all this devastation of the beautiful Surrey Green Belt.

   These are pictures taken today of the land proposed to be taken out of the Green Belt for the Housing for Garlick's Arch.

   **I object to not protecting the Green Belt (Policy P2)**
   I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl.

   There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

   The Plan should develop the existing brownfield sites at Burnt Common rather than developing Garlick’s Arch (A43).

   **What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

   **Attached documents:**
Comment ID: pslp171/370  Respondent: 10956161 / Pauline McCallister  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object removing Send Business Park from the Green Belt (4.3.15).

Send Business park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for it’s insetting (removal) from the Green Belt, and indeed GBC have not even attempted one. Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLLP16/4642  Respondent: 10957025 / Pauline Masters  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY P2

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider...
this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and
the consultation period restarted after the correction has been given the same distribution as the original statement. (I
assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that
the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of
these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that
infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It
is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing
development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the
NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored.
Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems
almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the
Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I
cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could
quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of
opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their
surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as
an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield
(A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires
there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt.
There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special
circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging
into one another. The significant development in these villages will result in the character of these villages being lost and
the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support
including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common,
with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4662  Respondent: 10957025 / Pauline Masters  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

1. SITES - POLICIES A1 TO A57

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.
1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15172  Respondent: 10957281 / Linda Heffer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy P2. – I object.
The requirements under this policy are a consequence of the flawed Strategic Housing Market Assessment which over-estimates future migration trends, on top of which arbitrary, unsubstantiated factors are applied. There is no popular desire to see large-scale inward migration as envisaged in the Draft Local Plan, which will inflict extra, large pressure on local infrastructure and degrade the quality of life for the population.
The proposal to remove West Horsley and other rural villages from the Green Belt is not consistent with the NPPF in that it does not reflect in fact ‘the great importance’ that the Government attaches to Green Belts. There is no proven need for these removals. The Strategic Housing Market Assessment is flawed in over-estimating the amount of inward migration that will occur; in this regard it is inconsistent with latest estimates from the Office of National Statistics, and with projections of national immigration made by Government (‘down to tens of thousands rather than hundreds of thousands’), and now more likely to be achieved following ‘Brexit’.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7237  Respondent: 10957313 / R Holmes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am objecting in the strongest possible terms to the proposed removal of green belt status from any part of the Send Ward (Send, Send Marsh, Burnt Common).

In Guildford Borough Council’s proposed submission Local Plan – June 2016 strategy and sites forward by Cllr Paul Spooner – Leader of the council he states ‘The Borough of Guildford is a very special beautiful place for all who live and work here. We want to keep it this way for generations to come.

- If this is so I cannot begin to understand why Guildford Borough Council is contemplating ruining the environment it is supposed to protect.
- The Removal of any areas of Send, Send Marsh and Burnt Common from the Green Belt Should be vigorously opposed so as not to radically change or damage our village environments.
In the ministerial forward of the national planning policy framework 2012 it states: ‘our national environment is essential to our wellbeing……….To the benefits of body and soul’ and ‘Planning must be a creative exercise in finding ways to enhance and improve the places in which we live our lives’

- Removing green belt status would certainly not enhance or improve our well-being or the places in which we live.

The national Planning Policy Framework 2012 (Section 9.79) States that: ‘The government attaches great importance to green belts. The fundamental aim of Green Belt Policy is to prevent urban sprawl by keeping land permanently open; The essential characteristics of Green Belts are their openness and their permanence’

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1251  Respondent: 10957313 / R Holmes  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

In the ‘Proposed Submission Local Plan – June 2017’, Guildford Borough Council has added Send Business Park to the list of sites they want removed from the green belt.

I write to object to the removal of Send Business Park from the green belt.

All green belt land must be protected – even previously developed sites. If we allow this, we will never get it back again and it will become easier for councils/developers to put developments on other green belt land. My previous objections also therefore apply to this objection response as well.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9429  Respondent: 10957857 / Adam Aaronson  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development, however, it does identify the principle of development and uses.” This ignores the tens of thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. I do not understand why the Council has permitted this. It seems to amount to a war of attrition being waged on the public by the Council in conjunction with developers. Many residents, including myself, are too busy to write, repeating the same comments to deaf ears. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014.[1] Some residents have concluded that commenting is a waste of time as the Council have their own agenda and are determined to see it through.

I believe that all Green Belt sites should be removed from the plan until “exceptional circumstances” for development are proven, as stipulated repeatedly in the NPPF. It is simply wrong to include them in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I am writing to object to POLICY P2 – Green Belt

I object in the strongest possible terms to the insetting of 14 villages from the Green Belt, and the proposal that infilling is acceptable within a further 12 villages within the Green Belt. I am also concerned that “infilling” is also proposed outside the settlement boundaries of 11 further villages.

Greenbelt is a binding covenant between the executive and the people and the proposal to inset is a travesty.

While I accept that the definition of “insetting” is valid in planning terms, I think that an inspector should note that it is a highly misleading as most people are unaware that it means “removing from”. In the same way as the electorate were misled over Brexit, they are being misled by jargon that is not clearly explained.

The Green Belt is supposed to be protected as a matter of national and local policy, Policy P2 seeks to justify development in a supposedly protected area, in breach of clear local manifesto commitments and contrary to previous responses to public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
• Profitable film locations (e.g. Shere)
• Future economic potential such as mineral extraction (even fracking)
• Natural beauty, landmarks, open space, rural views and sight lines
• Benefits to public health and wellbeing, physical and psychological (as well expressed in the NPPF)[1]

These assets should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultations.

The Council argues that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold.

I am not opposed to appropriate development in the Green Belt, but I fail to see why a system of fair burden-sharing of new development cannot be applied to the borough’s existing settlements in proportion to their size. The plan dumps hundreds of houses on the Horsleys, while burden sharing would minimise the strain on infrastructure and maximise the chances of retaining the character of each settlement through gradual growth. It is reasonable to ask urban Guildford, with a considerably larger population of semi-rural East Horsley for instance, to accommodate a larger proportion of new homes over the plan period.

The current proposal allows speculative development on greenfield sites where building costs are lower, covering the Green Belt with dozens of housing estates that few residents want. 8,086 new houses are planned for the Green Belt but only 1,135 for Guildford urban area. This is disruptive, socially inequitable and unnecessary. It will not only destroy countryside but will also delay and disincentivise much-needed urban regeneration. The remarkable revival and repopulation of central London shows that building dormitory satellite settlements is an out-of-date approach to planning.

I particularly protest at the “insetting” of 14 villages from the Green Belt, and at “infilling” 12 of the borough’s Green Belt villages. I do not agree that settlement boundaries should be hugely extended in many villages. I am against the infilling that is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages reflect the effect of ribbon development (often along just one side of existing roads) permitted between the Wars. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost hellbent on self-defeat.

I believe this policy is seriously flawed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2411  Respondent: 10957857 / Adam Aaronson  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

I object to Green Belt – POLICY P2 , POLICY P3, POLICY E5 and sites

It has been established that exceptional circumstances must be demonstrated in order to develop Greenbelt yet despite the weight of public opinion against weakening of this policy, 70% of proposed new housing development will be in the countryside, of which, 58% will be in Greenbelt.
Quite clearly, this is not an exception and no attempt is made to demonstrate exceptional circumstances, in line with the requirements of the NPPF. The sinister and misleading term “insetting” continues to be used. Most laymen think this means adding to the Green Belt and protecting a village from development, rather than the contrary. I am concerned about the continued policy of insetting villages since restrictions within the settlement boundary will assuredly lead to loss of character. The Rural Economic Strategy covered in 4.51a, promoting affordable homes everywhere in the countryside including the AONB as a main aim, is a mechanism for promoting overdevelopment in our countryside. It has not been subject to full public consultation and is based on data, which is not up-to-date.

Three major strategic sites – Blackwell Farm, Wisley Airfield and Gosden Hill Farm – are in the Green Belt. Previous consultations show that, in line with the NPPF, the public would prefer to use brownfield land in the urban area first.

Only a few days ago on 18th July 2017, The Communities Secretary, Sajid Javid said “As we have made clear in the Housing White Paper we expect brownfield sites to always be the priority to meet our housing need” in relation to Bradford’s Local Plan. Yet GBC continues with its plan to bulldoze the green belt and not use brownfield land, of which it has plenty.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/7243   **Respondent:** 10958177 / Brian Cooke   **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate?**

I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land that could be regenerated.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/8102   **Respondent:** 10958273 / Arthur Nicholls   **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate?**

Further to my objection dated 20 September 2014 I am again writing to object to the proposed settlement boundary change in Shalford in respect of the area behind Shalford Village Hall. This area of land sits in the heart of the village and is essential to its character and rural feel of the village, despite only being a couple of miles from Guildford. I live in [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] and any future potential development on this site will have a material detrimental effect on my property as the land in question sits above, and looks down upon, my property and garden.

There have been multiple attempts to change the settlement boundary in respect of this land. This was suggested in the last version of the local plan and was vehemently objected to by over 700 local residents. This latest attempt comes despite the council not responding to or addressing the multiple objections to the last attempt. In fact, it would appear that the council has brushed the previous objections 'under the carpet' in the hope that these will not be raised again this time. This is disappointing, to say the least. By repeated attempts to, essentially, do the same thing (i.e. rezone this land) it brings a heavy cloak of suspicion down on the council, as the only reason that can be seen for bringing these changes about appears to be to facilitate future development on this land. If this isn't the intention, then it must be asked why the council are wasting time and money on this when it could be to using this on value adding activities.
Repeatedly asking the same question also suggests that the council is hoping that the local residents will get 'objection fatigue' and start to tire of objecting, allowing this proposal to sneak through. This is not democratic - in fact, it’s the opposite, with locals beginning to think that the council has its own agenda regardless of what the local residents think. If the public don't engage because they do not believe that they will be listened to, this cuts across democratic principles.

I would also like to draw you attention to the following objections:

- A report was provided to the council in 2007 (the Landscape Assessment Study, 2007 by Chris Burnett), which reported that Shalford requires protection not further development, with the area sensitive and vulnerable to change. This area requires protection from the council, not rezoning.

- The land behind the village hall was donated to Shalford Parish Council a long time ago by a local villager, for the SPC to protect as open green field land for the whole village to enjoy ‘in perpetuity’. The council previously thought that the green belt and AGLV status would protect the land forever and so they could honour this resident’s wish of it being protected ‘ in perpetuity’. This brings into question as to why there should be any change.

- As GBC policy is to protect AGLV land unless in exceptional circumstances it makes no sense to move the settlement boundary behind the village hall as this would open up this green belt and AGLV land to development. No special or exceptional circumstances appear to have been stated.

- This steep elevation on this land would mean that any eventual potential development which could take place would be clearly visible from the village green and the surrounding village. The land is 32 feet higher than the nearby main road and over 25 feet higher than the village hall. As such these elevated fields very much contribute to the openess of the green belt and the attractive village setting - they are in fact like a green oasis of peace which the whole village can enjoy when either playing tennis, bowling or attending meetings or functions in the village hall. This field acts as the green lungs for the already 'developed' village and as such are something which so many people feel passionately about protecting for future generations to enjoy.

- Around the field behind the village hall there are already existing established hedges which have been in existence since before the 1950s. These established hedge rows and fences clearly mark the edge of the settlement boundary and have done so for decades, however they are not visible from aerial maps which also cannot pick up the unusual elevation of the land behind the village hall when calculating settlement boundaries. These form clear ‘defensible’ boundaries to de-mark the settlement boundary and so I see no need to alter the boundary for this reason.

- The Shalford Settlement boundary was originally drawn so that the land behind the village hall which is green belt and AGLV land remains outside of the settlement and thereby retains its critical protected status.

- Local traffic congestion is already a major issue with Chinthurst Lane, where the access would be to the site behind the village halls, already highly congested at rush hour. Chinthurst Lane has also become a favoured parking spot for commuters at the local railway station - which makes the lane almost impassable during the working day. This has resulted in cars mounting the kerbs by the Common to pass each other. Further up Chinthurst Lane, it is a narrow country lane without pavements and is already a dangerous place for young and old to walk along. As someone with a young child, this is of considerable importance to me.

In addition to the concerns above, any development (which surely must be with the intention behind the proposed boundary change) will affect the sight lines from the back of my property as this area is noticeably higher than the rest of the village. Due to this height, any possible future development will be able to look straight down into the windows at the back of my property (and a significant number of the surrounding properties). Of considerably more concern to me is that this area of land provides a significant drainage utility for the lower village. Even now, there is some 'run-off' which can be easily identified running down alongside Chinthurst Lane. The scale of this was demonstrated during exceptional wet weather in winter 2013/2014 when the corner of the Common and Chinthurst Lane flooded on a number of occasions (as the lowest point in the area). Development on this site will prevent any existing drainage resulting in increased surface 'run-off' which will run down hill and is highly likely to cause flooding to the lower lying properties (including my own) and the Common on a regular basis. Guildford Borough Council has a duty to ensure that this does not happen.
I very much hope that the Council appreciates the strong level of feeling in Shalford with respect to the proposed settlement boundary change and is willing to see sense and not make any such change to the boundary.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6637  Respondent: 10958753 / Ingrid Molossi  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to one specific aspect of the consultation process which is fatally flawed. The Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the green belt." This is demonstrably untrue and I believe it is deliberate untruth which compromises the consultation process. Even the council's position in the draft Plan is that exceptional circumstances exist so as to justify taking areas out of the Green Belt - which by definition has a detrimental impact on the Green Belt. This unqualified statement cannot be justified and is simply untrue. By giving this unqualified assurance to residents that there is no detriment to the Green Belt residents may have been reassured and dissuaded from responding to the consultation.

I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (We assume the document was delivered to most houses in the Borough.) I have no doubt that that people will argue before the inspector that the consultation process was flawed and ineffective because of this.

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6647  Respondent: 10958753 / Ingrid Molossi  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick's Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a 'special circumstance' and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC's Green Belt & Countryside Report does not address Garlick's Arch, so there is no evidence base to support including this site.

Rather than developing Garlick's Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17647  Respondent: 10958817 / Steve Wright  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

In general, I object to any building on land that is classified as the ‘green belt’. There may be exceptional cases but house building does not qualify.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17734  Respondent: 10958913 / Alan Batterbury  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, together with the sites of Wisley Airfield (A35) and Garlick's Arch there are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8968  Respondent: 10959009 / Rebecca Claridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt
Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of “About Guildford” (published by the Council) on page 5 states that “… the Plan rejects any schemes that would have a detrimental impact on the Green Belt.” This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.
GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18397  Respondent: 10959265 / Inger & Ron Ward  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/35  Respondent: 10959425 / Jan Lofthouse  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

As well as Objecting to Three Farms Meadows, Former Wisley Airfield being sited for development

I Object to Garlicks Arch Ripley being in the draft Local plan for housing

I Object to Land for new north facing slip roads to and from the A3 at Aend Marsh/Burnt Common

I Object to Land at the rear of the Talbot Pub Ripley as this is further Green Belt Development

Green Belt land MUST be protected at all cost

I Object to The Paddocks Rose Lane
as this further extends development in the Green Belt

All Land which is GREEN BELT is for common use as open spaces and it is not right to include these special areas as possible sites for planning

Kindly remove them from the Local Plan
Please use your derelict ugly sites in and around Guildford Centre to create housing jobs pleasant developments, shops and leave the Green belt alone. Rural villages should grow organically

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan as it impinges on the Green Belt and Ockham is a tiny rural historic village, yet G B C still includes former Wisley Airfield as a Strategic Site.
This will engulf Ockham, cause the loss of actively farmed land, affect air quality to the detriment of all visitors and locals in the area to a dangerous level, and there is no infrastructure

The following are important key reasons:

1. LOSS OF THE GREEN BELT
   I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Please Keep our Surrey villages in the green belt as Councillors have promised us - Once our precious Green Belt is Gone it is GONE FOR GOOD

G B C has plenty of derelict sites to build on - So please use them. Make this attractive for developers. Make developers give up their land banks

As a priority protect green belt land - Richard Rogers renowned architect and Government advisor has said there is no need to build on the GREEN BELT< SO PLEASE SAVE IT
Why not build on your unsightly unused sites first and leave the Green Belt Alone?

Please protect the green belt.

Please leave countryside alone.

Please Leave GREEN BELT land alone.

Please Leave useful agricultural land alone

Please visit the farmland in Ockham and Ripley and see the traffic at peak hours at Ripley High Street and off the A3 between Junction 10 and Ripley turn off

Thank you, you will see how this rural community could not cope with losing green belt sites and having thousands of extra dwellings imposed.

Please do not be remembered for making beautiful historic villages into urban sprawl.

Please be remembered for conscientious thoughtful planning using unsightly sites, and leaving green belt alone

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7786  Respondent: 10959457 / Maria Niblett  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the removal of Send from the Green Belt because it helps to separate the village and surrounding country side from Woking and Guildford dense housing.

I object to the building on the Green Belt at Send at Garlick’s Arch, Clockbarn Nurseries and Send Hill because it is not justified by any special circumstances as already exist a permanent site at Slydefield which doesn’t endanger the erosion of the current Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7793  Respondent: 10959457 / Maria Niblett  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the complete failure/ lack of will/enthusiasm of GBC to identify sufficient brownfield sites within the urban area which should be identified/targeted first for any development. The open countryside and the Green Belt should be looked at after the availability of brownfield sites have been exhausted. I object to the failure to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick's Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a 'specialcircumstance' and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC's Green Belt & Countryside Report does not address Garlick's Arch, so there is no evidence base to support including this site. Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to any in-setting of any villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12867  Respondent: 10961921 / Mark Johnson  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the removal of Send from the Green Belt because the village and its countryside provides a necessary buffer between Woking and Guildford. Failure to maintain this buffer would result in development that erodes the individual character of Send village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12279  Respondent: 10962689 / Martin Ladd  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from...
the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of “About Guildford” (published by the Council) on page 5 states that “... the Plan rejects any schemes that would have a detrimental impact on the Green Belt.” This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

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This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so-called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick's Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
• Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/258  Respondent: 10963137 / Gabrielle Erhardt  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Subject: I OBJECT TO THE 2016 DRAFT LOCAL PLAN

I am writing to inform you of my many objections to the Guildford Local Plan.

I strongly object to this destruction of the Green Belt, an area of land protected to safeguard the countryside.

I strongly object to the extraction of Ripley, Send and Clandon from the greenbelt and wish to firmly oppose this. The greenbelt was created to protect the unrestricted sprawl of large built up areas and I believe that the removal of these villages from the greenbelt would serve to encourage this sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17755  Respondent: 10963233 / Susan Poole  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

You oppose unjustified Green Belt development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14045  Respondent: 10965953 / Mark Thompson  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
We object to the proposal to remove East Horsley from the green belt & do not feel that the "exceptional circumstances" have been fully demonstrated.

-we object to the extension of the settlement boundaries since no valid reasons have been given for this and it appears the aim is to simply increase the land available for future additional development

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17319</th>
<th>Respondent: 10967041 / Ashley Brown</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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</tr>
</tbody>
</table>

Finally I note that the Proposed Local Plan includes the statement “We will continue to protect the Metropolitan Green Belt”. I fully support this policy. However, unfortunately GBC appears to be in breach of this same policy throughout the Local Plan! In fact 65% of developments will be made on land that is currently Green Belt so how does this statement stand up against such a blatant attack on the green belt within the local plan?

*Sadiq Khan, new Mayor of London, has instructed London planners NOT to approve development on Green Belt Land within the M25. If we continue to build on our countryside it won’t be many decades before we have none left. Creeping development has led to almost continuous housing from Central London to Effingham. Is this to carry on to Guildford and beyond? (1,700 houses are planned for the Guildford end of the Hogs Back and 1,000 new houses on greenfield sites in Normandy.)*

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/2393</th>
<th>Respondent: 10967041 / Ashley Brown</th>
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<td></td>
</tr>
</tbody>
</table>

Green Belt:

No case has been made for building on the Green Belt for which national policy requires exceptional circumstances.

The Proposed Local Plan includes the statement “The Metropolitan Green Belt will continue to be protected”. I fully support this policy. GBC appears to be in breach of this same policy throughout the Local Plan! In fact 65% of developments will be made on land that is currently Green Belt so how does this statement stand up against such a blatant attack on the green belt within the local plan?

*Sadiq Khan, Mayor of London, has instructed London planners NOT to approve development on Green Belt Land within the M25. If we continue to build on our countryside it won’t be many decades before we have none left.*

I object to the continued proposed ‘insetting’ of East & West Horsley and other villages from the Green Belt and the expansion of the settlement boundaries.

I object to the statement in P2 (4.3.13) that these villages are ‘now inset from the Green Belt’ when this is only a proposal. I also object that this section does not take into account an assessment of their Green Belt benefits.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15685  Respondent: 10967329 / Steve Johnson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Proposal to remove the Horsleys from the Green Belt - The "exceptional circumstances" required before taking this action have not been demonstrated.

Extension of the boundaries of the Settlement areas of the Horsleys - No sound reasons have been given for the proposed changes, which seem to be aimed solely at increasing the land available within the settlements for future additional development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11947  Respondent: 10967489 / Jenny Jackson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy. The Plan should develop the existing brownfield site at Burnt Common rather than developing Garlick’s Arch (A43).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7914  Respondent: 10967937 / Sean Robinson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

OBJECT TO SEND VILLAGE BEING REMOVED FROM THE GREEN BELT.

The Green Belt was intended to be permanent as required by the National Planning Policy Framework.Send’s Green Belt provides an essential buffer between Woking and Guildford providing an essential area preventing the area becoming one sprawling conurbation.Specifically I live at the bottom of [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] directly adjacent to the
River Wey. There is a plethora of wildlife on the Wey to include deer, swans, cormorants, migrating geese, fox, badger, numerous fish species, snakes, barn owls, birds of prey, bats, kingfisher to name but a few species. Increased urbanisation and the associated congestion and the effects of an increase in population will bring an increase in pollution, pressure on the river with increased flood risk that will be both aesthetically detrimental to the scenic beauty and have a significant negative impact on both the wildlife and incumbent long established human habitation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13817  Respondent: 10968481 / Vivienne Ottaway  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

P2

1) I object to Send village being removed from the Green Belt - the Green Belt was intended to be permanent and the Green Belt in Send is an essential buffer between Woking and Guildford to stop them becoming one connerbation. There was a clear election promise locally and nationally to protect the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6355  Respondent: 10969601 / Jenny Paviour  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

May I request that my comments below are shown to the Planning Inspector and hat I have confirmation that Guildford Borough Council has received my communication.

I would like to object to Send Village being removed from the Green Belt as the surrounding countryside provides a necessary buffer between Woking and Guildford. And as it is Green Belt, I object to it being built on at Garlick Ash, Clockbarn Nurseries and Send Hill. Green Belt is meant to be permanent and not continually eroded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12949  Respondent: 10972065 / Sarah Cocke  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY P2

I OBJECT to not protecting the Green Belt (Policy P2)
This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of “About Guildford” (published by the Council) on page 5 states that “... the Plan rejects any schemes that would have a detrimental impact on the Green Belt.” This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.
In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I strongly object to this policy.

The local plan document states that “the main aim of Green Belt is to prevent urban sprawl by keeping land permanently open. Green Belt also provides opportunities for people to access the countryside, to protect land for agriculture, forestry and similar land uses, and for nature conservation”.

Your document states that “national planning policy requires that Green Belt boundaries are only amended in exceptional circumstances”. The housing need appears to be the sole purpose of removing our villages from Green Belt. While there is a general need for new dwellings in the UK, it does not support a case for “exceptional circumstances”.

Removing villages listed in para 4.3.13 of the plan document, will give way to a burst of developments, most of which are likely to be of a commercialised urban nature which will inevitably result in losing the rural appeal of the area. It will destroy the existing surrounding nature by effectively allowing London boundaries to overflow. The beauty of Surrey Hills has earned a reputation that has attracted many visitors from the UK and abroad over the years, to the extent that our surrounding areas were selected to represent Great Britain on numerous tournaments of 2012 Olympics. Areas surrounding our villages continue to be regularly enjoyed by the British sports enthusiasts and visitors all year round.

The area has been the pride and joy of many residents who tirelessly work on maintaining and keeping our precious nature, accessible to all, at our door step.

I urge you to re-consider and to save our open land, nature and the villages for future generations by keeping Green Belt boundaries unchanged.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
3. Policy P2 states that the Green belt will be protected against inappropriate development. I am totally opposed to the removal of West Horsley from the Green Belt because the exceptional circumstances have not been proved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

1. **Policy P2: Green Belt:** I object to the proposal to remove any land at and around Send from the Green Belt. The fundamental aim of the Green Belt is to limit urban sprawl. There is currently little open land remaining between Woking and Guildford and further encroachment would endanger the existence of Send as a village, whilst removing yet more countryside in an already pressurised rural environment. The creation of a Guildford-Woking conurbation which would emerge from this sacrificing of our Green Belt would change the nature, not only of our countryside, but also of Guildford itself, which maintains its attraction as a charming ancient market town in the ‘stockbroker belt’.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Green Belt – I OBJECT. I object to the insetting of 14 villages from the Green Belt, and the proposal that infilling is acceptable within a further 12 villages within the Green Belt. I am concerned that “infilling” is also proposed outside the settlement boundaries of 11 further villages. Essentially, all the villages within the Green Belt are now vulnerable to extensive further development. Green Belt is supposed to be protected as a matter of national and local policy, but this policy seeks to justify development in a supposedly protected area, in breach of local manifesto commitments and contrary to previous responses to public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Green Belt – I OBJECT. I object to the insetting of 14 villages from the Green Belt, and the proposal that infilling is acceptable within a further 12 villages within the Green Belt. I am concerned that “infilling” is also proposed outside the settlement boundaries of 11 further villages. Essentially, all the villages within the Green Belt are now vulnerable to extensive further development. Green Belt is supposed to be protected as a matter of national and local policy, but this policy seeks to justify development in a supposedly protected area, in breach of local manifesto commitments and contrary to previous responses to public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
My comments on the Guildford Local Plan are as follows:

The Green Belt

The Metropolitan Green Belt is one of the best legacies our forefathers left us and needs upholding, respecting and maintaining AS IT IS TODAY in order that we, and future generations, may benefit physically, emotionally and mentally from enjoying the expanse of fresh air which is hugely enhanced by the greenery around us.

Build houses elsewhere - not within the Green Belt!

The Horsleys (East Horsley and West Horsley) must absolutely remain within the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

** I object to not protecting the Green Belt (Policy P2)

** I object to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (site A35) and Garlick’s Arch (site A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.
Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/8373  **Respondent:** 10989601 / Margaret Mew  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

1. I object to not protecting the Green Belt (Policy P2)

I object to the proposals to remove the villages of Ripley, Send and Glandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick's Arch (A43).

National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

Rather than developing Garlick's Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/219  **Respondent:** 10989793 / Ruth Pott  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I write in response to the revised Draft Local Plan.

1) I object most strongly to any and all erosion of the Green Belt

2) I object most strongly to any “in setting” of any villages from the Green Belt

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/8317  **Respondent:** 10990145 / Anne Lee  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I write in response to the revised Draft Local Plan.

1) I object most strongly to any and all erosion of the Green Belt

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
1. POLICY P2

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of “About Guildford” (published by the Council) on page 5 states that “… the Plan rejects any schemes that would have a detrimental impact on the Green Belt.” This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.
This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/383  **Respondent:** 10990465 / Victoria Bean  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I OBJECT to the removal of 15 villages, including Ripley and Send, from the green belt. This will lead to wholesale, and often inappropriate developments.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/8747  **Respondent:** 10990657 / Diana Owen  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object strongly to the proposed removal of the Horsleys from the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp171/2109  **Respondent:** 10991841 / Abbey Jarman  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**
I object to the proposed local plan:

1. The reduction in the number of new homes in the Green Belt is insufficient. There is still an enormous number of new dwellings proposed for construction in the Green Belt, particularly when considered in proportion to the number of existing homes.
2. It is proposed that the area east of the borough takes an even higher number of dwelling in the Green Belt than before.
3. Many other councils have chosen not to constrain overall housing growth to protect the Green Belt, yet Guildford has not. Although the objectively-assessed housing target has been reduced since the 2016 plan to 12,466 dwellings by 2034, this still represent a 25% growth for Guildford, which is disproportionate.
4. Nothing has changed since last year’s consultation to address the sustainability aspects of the West Horsley development sites, as is required by national policy requirements. No matter how much people are encouraged to travel on foot or by cycling, each new home will need a least one car to give access to Horsley station, shops, medical centre, library, etc.; this is easily demonstrable.
5. More apartments are needed in Guildford, not more retail space. The rise of on-line shopping and the reduction in physical shopping is clearly documented and many authoritative reports support that view that the trend will continue.
6. No changes have been made to the proposal to inset both East and West Horsley from the Green Belt. Policy P2 states that the Metropolitan Green Belt will continue to be protected against inappropriate development. I object to the village’s removal from the Green Belt by insetting and extending the 2003 Local Plan Settlement Area boundaries.
7. The overload of local social and physical infrastructure is not addressed. Increased demand for access to medical facilities, schools, station parking, roads, and particularly disposal of waste water remain at large.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I moved out of London, over 6 years ago, after having lived there for more than 10 years. We are a young family and made a conscious decision to live in a healthy and green environment. We found Horsley to be that place. Surrounded by clean air, peace and quiet, no light pollution at night, woodland and nature in a small community. A perfect place for our kids and us to be outside and be a healthy happy Family. I believe strongly that in protecting the green belt you protect it for the future. Not only for those who live here but also for those who visit. Once it’s gone its gone!

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14625</th>
<th>Respondent: 10992225 / Emma Ringshaw</th>
<th>Agent:</th>
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<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt). This yet another example of an ill thought out plan and approach. Once taken the Green Belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl with these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost - to the serious detriment of residents and visitors to the area - and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site. Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/1445</th>
<th>Respondent: 10992417 / Philip Erhardt</th>
<th>Agent:</th>
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<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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</tr>
</tbody>
</table>

I object to the Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the former Wisley Airfield.

I object to proposals to remove Ripley, Ockham, Clandon and Send from the Green Belt. There are no exceptional circumstances for removal.

I object to a plan which proposes that over 70% of new housing be built within the Green Belt.

I object to any reduction or tinkering with the Green Belt. There is enough brownfield land to use without encroachment on the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
I OBJECT to the removal of 15 villages, including Ripley and Send, from the green belt. This will lead to wholesale, and often inappropriate developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brownfield sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider
this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

As a West Clandon resident I am extremely concerned that the removal of these sites will result in the merging of our Green Belt village with the developments on the outskirts of Guildford, making a complete mockery of the term Green Belt. Our village character will be lost for ever if this happens, so we must try above all else to retain our Green Belt, not build on it.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the erosion of Green Belt and in particular, villages being inset from the Green Belt, as this is an irreversible process affecting quality of life for future generations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/655  Respondent: 10995233 / Pam Harnor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the proposal to inset Send Business Park from the Green Belt because:

It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation
There is highly restricted vehicular access along Tannery Lane in both directions
Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1134  Respondent: 10995297 / Peter Cormack  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I objected to the 2014 Draft Plan and frankly can see little difference in the current plan to which I again object.

I object most strongly to any building on the GREEN BELT.

I object to any villages that are currently in the GREEN BELT being removed from it, such as the Horsleys, Ripley, Send, Clandons. There can be no justification for it as there are plenty of BROWNFIELD sights still available to accommodate the suggested requirement for some 693 homes per year for the next 20 years.

I object to the possibility of Guildford being increased by some 25 per cent due to the foregoing predictions.

I object most vigorously to any Brownfield sights being used for further factories, offices, warehouses and shops that would not include very substantial affordable housing in their planning footprints.

I object very strongly to any change in current settlement areas.

I object strenuously to any diminution of the current GREENBELT (National Planning Policy Framework Para 79).

I object to any widening of the village boundaries to encroach upon the current Greenbelt.

I object to the scale of new building throughout the Guildford borough which can not be reasonably substantiated and appears completely unfounded and a figment of some distant planners imagination.

I object most strongly and specifically to the proposed building on Gosden Hill Farm which is in the GREENBELT and designed to keep West Clandon from being absorbed into the Guildford sprawl.
I object again most vociferously to any development of Garlick’s Arch with a view to creating a spur off the A3 going Southbound or Northbound as the surrounding infrastructure would be totally unable to handle any increase in vehicular traffic. Our already overcrowded village roads would not be able to cope with any increased traffic and would cause a highly increased possibility of injury or death to the local population as sidewalks are virtually non existent or indeed too narrow to accommodate the current village populations.

I object most strongly to any change being made to Newlands Corner, an area of Outstanding Natural Beauty that is FREE to everybody to enjoy.

It is fact that Surrey County Council has no funds available to repair many of the roads in and around West Clandon - specifically the junction of the A247 and A246 at the South end of West Clandon, and it would appear the Highways Authority have no interest.

The GREENBELT is sacrosanct and must be fully and totally protected at all times for future generations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15721  Respondent: 10995585 / Patricia Swain  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Local Plan on the grounds of development of green belt land which should be preserved as an amenity not just for the present but for generations to come.

No consultation has been carried out directly with local residents and the impact on the area would be enormous, not to mention the detrimental effect on already clogged local roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15722  Respondent: 10995585 / Patricia Swain  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

There should be NO BUILDING ON THE GREENBELT without local resident agreement. This greenbelt destruction is robbing the next generation of their heritage and driving up pollution and traffic. The purpose of green belt is to prevent urban sprawl. Why should land that has previously been designated greenbelt be allowed to have that status removed? If it was deemed that it should be greenbelt then, it is even more important now that it remains greenbelt as pressure from developers grows.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12487  Respondent: 10996737 / Sara Donnelly  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I oppose unjustified Green Belt development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6994  Respondent: 10997121 / Rob Curling  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.
I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/957  Respondent: 10997377 / Sarah Singleton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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GUILDFORD PROPOSED LOCAL PLAN 6/6/2016 - FIELDS BEHIND SHALFORD VILLAGE HALL

As a resident of Shalford, and as family members of Shalford LTC, I am writing to strongly object to the current version of the local plan which removes the fields behind the Village Hall and Tennis Club from the Green Belt and puts them in the Shalford settlement boundary.

Although these fields have been classified as “open spaces” I am concerned that they do not have the same degree of protection as the Green Belt from housing development. Should houses be built on this site, the resulting traffic chaos would increase the already severe problems for Shalford, where roads are blocked every weekday from 7am – 9am as traffic tries to join the heavily congested A281 into Guildford and the surrounding towns. Vehicles from any housing
built on these fields would have to join traffic on Chinthurst Lane, further causing pollution and increasing the risk of an accident as many young children and families walk along Chinthurst Lane to school.

Furthermore, I feel the small village of Shalford needs to be preserved as such; we do not have the amenities, facilities or space to accommodate more housing on green space. Any construction on these fields, which are 25ft above the village hall, would tower over the tennis courts and bowling green and totally destroy not only the green lung of our village, but also the visual appeal of the area.

I urge you to make a small adjustment of the village boundary, moving it back to the 2003 green belt boundary, thereby protecting these fields and ensuring they remain open spaces for future generations of our village to enjoy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6925  Respondent: 10997537 / Sarah Nelson  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to send village being removed from the green belt, central government gave a clear promise to protect the green belt. I voted for this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11172  Respondent: 10998081 / David Marshall  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to not protecting the Green Belt (Policy P2)
This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing...
exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions. Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the removal of additional 3.1 ha from the green belt without any justification

I object to the change in green belt boundary

I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3

I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9099  Respondent: 10998721 / C E Noble  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to any erosion or diminution of the Green Belt to facilitate further development is totally unjustified. The Green Belt was originally to prevent urban sprawl and to maintain our countryside and rural areas; these proposals are a radical departure from this long-held principle. The notion that entire villages, such as Wisley and Ripley, can simply be removed from the Green Belt and lose the protection that this status offers is mind-boggling.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9102  Respondent: 10998721 / C E Noble  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to any erosion or diminution of the Green Belt to facilitate further development is totally unjustified. The Green Belt was originally to prevent urban sprawl and to maintain our countryside and rural areas; these proposals are a radical departure from this long-held principle. The notion that entire villages, such as Wisley and Ripley, can simply be removed from the Green Belt and lose the protection that this status offers is mind-boggling.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7996  Respondent: 10998817 / Janet Williams  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to any erosion or diminution of the Green Belt to facilitate further development is totally unjustified. The Green Belt was originally to prevent urban sprawl and to maintain our countryside and rural areas; these proposals are a radical departure from this long-held principle. The notion that entire villages, such as Wisley and Ripley, can simply be removed from the Green Belt and lose the protection that this status offers is mind-boggling.
I object to Send losing its Green Belt status

The Green Belt should remain intact throughout the borough. Its purpose was to ensure villages/towns don’t merge and become large conurbations, to protect the countryside, to encourage the use of derelict and other urban land, to preserve the special character of old towns and villages. All these issues are still relevant, perhaps even more so.

With more and more development, housing and industry in the South East we are seeing huge increases in road and air travel. Consequently, the air quality in the South East is under threat. London itself, has some of the worst air pollution of all European cities. If we increase development and at the same time lose the Green Belt we reduce the means to help improve or maintain air quality at an acceptable level. It is the vegetation in the Green Belt that is responsible for absorbing the additional carbon being produced by our increased travel and industrial use.

The air quality along Send Road is already unacceptable. I lived on Send Road for 20 years and my neighbour’s child suffered so badly with asthma that they were forced to move to another area of Send, away from the main road. This may be anecdotal evidence but I wonder if it would be possible to do some monitoring of air quality along these busy roads before we plan to increase the weight of traffic yet again.

Green Belt was meant to be permanent unless it could be shown that exceptional circumstances existed to allow it to be developed. Surely these ‘exceptional circumstances’ need to be considered on an individual basis rather than just wholesale removal of all land in the village from the Green Belt.

The National Planning Policy Framework (NPPF) states that ‘unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the ‘very special circumstances” justifying inappropriate development on a site within the Green Belt’. (NPPF 3-034-20140306).

Surely those responsible for planning should consider the bigger picture. The number of new houses and other developments listed in the Local Plan is significantly above the actual need and will cause enormous pressure on the existing infrastructure especially the increases traffic on our already unacceptably busy roads and motorways. Global warming is not an idle threat and the UK should be responsible with its plans for development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the extension of the boundaries of the Settlement areas of the Horsleys

No sound reasons have been given for the proposed changes, which appear to be aimed solely at increasing the available land within the settlements for future additional development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5997  Respondent: 11000385 / Sheila Robins  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO all erosion of the Green Belt. Once we use this for building it will be lost forever. There are plenty of Brown Field sites to be built on first before using the Green Belt. The Green Belt is a buffer between Woking and Guildford

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6002  Respondent: 11000385 / Sheila Robins  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO any “in-setting” (i.e. removal) of any villages from the GREEN BELT

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16817  Respondent: 11000385 / Sheila Robins  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO all erosion of the Green Belt. Once we use this for building it will be lost forever. There are plenty of Brown Field sites to be built on first before using the Green Belt. The Green Belt is a buffer between Woking and Guildford

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16819  Respondent: 11000385 / Sheila Robins  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document: complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO any “in-setting” (i.e. removal) of any villages from the GREEN BELT

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**POLICY P2: Green Belt**

Local Plan Policy P2 states that: *We will continue to protect the Metropolitan Green Belt.* I fully and un-equivocally support this policy.

Unfortunately, despite such brave words, GBC appears to be in breach of this policy itself through the housing policies that it has set out in the Local Plan. The analysis included in the Appendix shows that around 65% of the developments proposed in the Proposed Submission Local Plan are to be built on land currently within the Metropolitan Green Belt. We consider this outcome to be outrageous.

Under NPPF rules, GBC is permitted to make allowance for factors which may constrain the delivery of new housing, such as the need to protect the Metropolitan Green Belt or the restrictions required to protect the Surrey Hills Area of Outstanding Natural Beauty (‘AONB’) which is offered protection under the NPPF comparable to that of a national park. Although these areas make up a large proportion of the land area of Guildford Borough, GBC makes no attempt to reduce its housing delivery in order to take account of such constraints. I find this approach inexplicable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

**Comment ID:** PSLPP16/13887  **Respondent:** 11001249 / Lesley Milton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document: complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT strongly to the proposal to remove the Horsleys (and other villages in the Borough) from the **Green Belt**. In paras 79 and 80 of the NPPF (National Planning Policy Framework - Mar 12) the Government places great importance on the Green Belts and in Para 83 states that once established they should only be altered in “exceptional circumstances” through the preparation or review of the Local Plan.

65% of new houses in the Borough are to be built on land that is currently in the Green Belt.

The Green Belt around the Horsleys serves all 5 of the purposes set out in para 80.

Para 84 states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

The draft plan does not identify the “exceptional circumstances” required to remove the Horsleys (and other villages) from the Green Belt nor the “very special circumstances” required to build on Green Belt land.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attachments:

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**Comment ID:** PSLPP16/3209  **Respondent:** 11001505 / Greta Edwards  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 houses

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**I object to the draft Local Plan for 10 fundamental reasons:**

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban sprawl stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attachments:

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**Comment ID:** pslp171/555  **Respondent:** 11001505 / Greta Edwards  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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**Green Belt – POLICY P2, POLICY P3, POLICY E5 and sites**

Exceptional circumstances must be demonstrated in order to develop Greenbelt yet despite the weight of public opinion against weakening of this policy, 70% of new housing development will be in the countryside, of which, 58% will be in Greenbelt. By definition, this is not an exception and no attempt is made to demonstrate exceptional circumstances, in line with the requirements of the NPPF. Insetting villages is of concern since restrictions within the settlement boundary raises concerns over loss of character.

The Rural Economic Strategy covered in 4.51a, promoting affordable homes everywhere in the countryside including the AONB as a main aim, is a mechanism for promoting overdevelopment in our countryside. It has not been subject to full public consultation and is based on data, which is not up-to-date.

Three major strategic sites – Blackwell Farm, the former Wisley Airfield [Three Farms Meadows] and Gosden Hill Farm – are in the Green Belt. Previous consultations show that, in line with the NPPF, the public would prefer to use brownfield land in the urban area first

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attachments:
Comment ID: pslp171/2557  Respondent: 11001793 / Claire Brown  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

No case has been made for “Exceptional circumstances” for building on the greenbelt, even though Guildford Borough council have rejected plans for the Wisley Airfield, this has been included again.

I object to the continued proposed ‘insetting’ of East & West Horsley and other villages from the Green Belt and the expansion of the settlement boundaries.

I object to the statement in P2 (4.3.13) that these villages are ‘now inset from the Green Belt’ when this is only a proposal. I also object that this section does not take into account an assessment of the Green Belt benefits.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6352  Respondent: 11002881 / Sheila Proctor  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing in response to your invitation to comment on the Guildford Borough Proposed Submission Local Plan.

I object to the proposal to inset the villages of East and West Horsley from the Green Belt. Nowhere in your documents do you produce evidence to support the existence of exceptional circumstances which would support this being carried out.

All the objective evidence seems to derive from the need to release land for building development, and the study carried out by your consultant is inconclusive, subjective, and fails to take adequate note of the fact that the original aims of the Green Belt are still met in the cases of villages like East and West Horsley. The report of the study by your consultant bears the hallmarks of a desktop study and the result is a shallow analysis of the current situation which lacks conviction.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15252  Respondent: 11002881 / Sheila Proctor  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

This policy states that Guildford Borough Council (GBC) will continue to protect the Green Belt and we fully support that aim.

In the villages of East and West Horsley the original objectives of the Green Belt continue to be fully met and we disagree with the analysis in the Green Belt and Countryside Study (GBCS) documentation produced by consultants on behalf of GBC which fails to acknowledge the open nature of the villages, the large areas of woodland and open space which are integral to the appearance of the area and the low density of housing in the settlement areas.

We object strongly to the proposal to remove the villages from their current status by insetting them from the Green Belt and we do not believe that GBC have demonstrated the exceptional circumstances which are necessary to support such a
proposal. The only circumstances that they present are those for increased development, in particular housing, which is unacceptable as a basis even if the proposed development was based on accurate and supportable evidence. As outlined above, this is not the case as the OAN and the SHMA are flawed.

There is also a proposal to change the settlement boundaries for the villages which appears to arise from the GBCS. The reason for changing the boundaries appears to be solely in order to include additional area inside the village boundaries in order to make land available for development. In many of the cases the proposed extended boundary lines are less recognisable in logic and certainly less defensible than the existing ones. We object to these proposals to change the settlement boundaries for East and West Horsley and in addition object to the newly designated "identified boundary for the Village" proposed to the south of the A246 in the area of Chalk Lane, The Warren, Rowbarns Way and Green Dene.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13899  Respondent: 11002945 / David Guthrie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the removal of Send from the Green Belt because the village and its countryside provides a necessary buffer between Woking and Guildford while providing a life enriching environment for my family.
2. I object to the building on the Green Belt at Send at Garlick’s Arch, Clockbarn Nurseries and Send Hill because it is not justified by any special circumstances. If we start making exceptions the boundaries to stop this happening in the future are removed. The Green Belt is meant to be permanent and not continually eroded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13902  Respondent: 11002945 / David Guthrie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford’s urban brownfield areas much closer to existing transport hubs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13907  Respondent: 11002945 / David Guthrie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity.
I request that the following comments are shown the Planning Inspector.

I wish to register my strongest opposition to GBC proposal to desecrate the Green Belt.

I object to any planned Green Belt erosion.

I object to the fact that local villages are to be obliterated in an effort to bring money into GBC so that they can fund their vanity project of a tunnelled A3 to Bypass Guildford.

I object to your Policy2, at paragraph 4.3.15
On what grounds do you find it acceptable to remove an old existing “non-conforming” business out of Green Belt jurisdiction?

Yet again you have made no consideration of the Traffic problems that further development of the area would create in the Village and surrounding Lanes, I use the term lanes because they could only just about be classed as roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/2156</th>
<th>Respondent: 11003681 / Elizabeth Milner</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>

I object to all Green Belt erosion

Under this policy Send will be inset from the Green Belt which means that all areas within the settlement boundary will no longer be afforded Green Belt protection There are plenty of sites that could be utilised. Wisley Airfield for one.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16407</th>
<th>Respondent: 11004129 / Alastair Reid</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>

Green Belt Policy 2 at paragraph 4.3.15

I object to the proposal to inset Send Business Park from the Green Belt because

There is highly restricted vehicle access along Tannery Lane in both directions

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

As a resident of East Horsley I wish to register strong objections to the Local Plan on a number of counts.
GREEN BELT

Without doubt our Green Belt is precious. It is what protects London from urban sprawl; it preserves air quality; it prevents flooding; it is the city’s playground. It is for us to conserve and protect it. There are 5 legal purposes for Green Belt, and it meets them all:

- To check the unrestricted sprawl of large built up areas
- To prevent neighbouring towns merging into one another
- To assist in safeguarding the countryside from encroachment
- To preserve the setting and special character of historic towns
- To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

NO EXCEPTIONAL CIRCUMSTANCES

The local plan proposes ~ 9,000 new homes to be built on Green Belt land (compared with ~ 50,000 current homes in Guildford, so approx. equal to 18% of the existing homes in the borough)

The National Planning Policy Framework (NPPF) requires any change of Green Belt boundaries to demonstrate exceptional circumstances. Unmet housing need is NOT an exceptional circumstance in law.

In addition the existence of the Green Belt/AONB is a reason for NOT meeting objectively assessed housing need (i.e. such protected land is a legal constraint against any such development). No exceptional circumstances have been disclosed. So the Green Belt boundaries should NOT be changed. To remove most of the Borough’s Villages from the Green Belt would change the nature of this area of countryside forever and would eventually merge historic and separate villages. It would be an environmental outrage.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Comment ID: PSLPP16/6473  Respondent: 11005377 / Peter Robinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I firmly object to the New Local Plan 2016.

I live in East Horsley and I am absolutely against all measures to reduce the green belt in this area most particularly by removing any part of East Horsley village (and other neighbouring villages) from this green belt. A massive increase in the housing stock of the Horsleys of 593 new houses represents something like a 35% increase. Nowhere can I see ANY justification for this requirement other than a badly worked consultant's report which is based upon some wildly inaccurate forecasts.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Comment ID: pslp171/1339  Respondent: 11005473 / Nick Thomas  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
The plan as it relates to Send is flawed on three levels:

- the calculation of housing requirement for the Borough as a whole is extremely spurious, based on wrong assumptions about industrial demand, classification of university students and the indiscriminate imposition of national-level requirements on individual regions

- the share of the burden of development to be placed on Send and its environs has been from the first draft suggestive of a very poor attitude to complying with the demands of government. Rather than 'how can we spread this requirement fairly across the Borough', the Council appear to be asking 'which few parishes can we sacrifice in the interests of keeping the others relatively happy'. More important in my view, the Council's disregard for the Green Belt has been shocking: the Act requires 'exceptional circumstances' for areas to be removed from the Belt, while the current justifications for development are the most unexceptional imaginable - ongoing pressure of population and increasing demand for housing. This is exactly what previous governments committed not to doing.

In spite of this, we see the Plan focusing on new build in areas such as Send, Ripley and Wisley where it's easy and cheap to carve up the countryside, rather than making a serious attempt to use the Borough's extensive brownfield capacity to cover a high proportion of the development. The official line seems to be to talk about affordable housing and insinuate that those objecting are NIMBYs: but given the choice of sites (highly unpopular but the most profitable for development) and the decision to make a minimum of only 40 percent of houses built on land freed up for development 'affordable' (equivalent to perhaps 25 percent of the land thus freed up) - leaving developers rubbing their hands over the other 75 percent, it's hard to keep faith in the Council's having any other motive than greed.

If you want to free up land for affordable housing, why not use *all* that land for affordable housing, and make sure the developers get a decent price for their work? Then we'd be talking about 25 percent of the current land grab and you might get a less furious response from residents [though it should still be brownfield]. The fact that the Council is far more worried about the developers' feelings than those of the local residents, speaks volumes.

- most specifically, the effect on Send of the proposed developments will be to cripple the already creaking road system, massively overload schools and medical facilities, undermine the environment and - in short - ruin the village. It's far from perfect at the moment but I can say hand on heart that it's quite a nice place to live. It seems likely to be a truly grim place to live if the Plan goes through.

It's the third of these I want to focus on for the remainder of this email, and as instructed I shall focus on changes made since the previous draft - but please note none of the objections raised previously have been addressed and you should still give these full consideration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the proposal to remove the Horsleys from the Green Belt as there are no exceptional circumstances to make this a valid option.

I object to the proposed extension of the boundaries of the settlement areas of the Horsleys as no good reasons have been provided.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Proposal to inset East Horsley from the Green Belt Policy

I OBJECT to the proposal that East Horsley should be inset from the Green Belt, instead of being ‘washed over’ as it is today. East Horsley is set in a rural location and the village has the look and feel of a rural village. Its Green Belt status has been a key factor in preserving that character. Moreover, being ‘washed over’ by the Green Belt has not been a serious constraint on development within the village. Woodlands and large residential gardens make a vital contribution towards biodiversity, provide wildlife corridors, and furnish those open spaces which are vital to the character of the greenbelt. Removal of the Horsleys from the Green Belt would require exceptional circumstances and these have not been demonstrated. There is no consideration in the plan of the effect of such insetting upon the villages and this is required by the National Planning Policy Framework.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Changes to the Settlement Boundaries

I OBJECT to the proposed Settlement Boundary changes in East Horsley. GBC are proposing to make a number of changes to the settlement boundaries of East Horsley and so expand the settlement area, as set out in the Proposals Map. The changes to the settlement boundaries in the Horsleys appear to have been done purely on the basis of including additional Greenfield sites which can then be built on. I can see no reasons given for the proposed changes and therefore the boundaries should remain as they are.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8541  Respondent: 11006145 / Peter Bradshaw  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Comment ID: PSLPP16/8542  Respondent: 11006145 / Peter Bradshaw  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Comment ID: pslp171/2022  Respondent: 11006241 / Sally Harrison  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Finally I object to taking Send Business Park out of the Green Belt. **Policy 2 paragraph 4.3.15.** The current development should never have taken place. It is in an area of beautiful countryside right next to the charming Wey Navigation. The tow path is regularly used by walkers and the water used by boats and canoists. It will spoil this area for everyone's leisure use completely.

I am repeating myself but it also creates more problems for Tannery Lane which is totally unsuitable for larger vehicles in both directions.

I appeal to you to consider these objections seriously, to draw up a plan which is fair to all residents in Surrey, and in particular a plan which respects our natural environment and does not encroach on Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: PSLPP16/10417  **Respondent:** 11007073 / Gyles McIver  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Glandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick's Arch (A43) there are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

Comment ID: PSLPP16/14980  **Respondent:** 11007201 / Valery Smirnov  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to this policy.

I particularly protest at the “insetting” of 14 villages from the Green Belt and at “infilling” 12 Green Belt villages. It is disturbing to learn of the proposed extension to the settlement boundaries in many villages which will inevitably lead to numerous overdeveloped areas and a total extinction of the rural feel and the surrounding countryside.

Having reviewed the above policy, I note that the NPPF’s other 4 tests of Green Belt status including the prevention of urban sprawl have been ignored. The policy also states that “the general extent of the Green Belt has been retained”, which is a misrepresentation.

Policy P2 seeks to justify excessive development on the Green Belt designated land without demonstrating exceptional circumstances required for alterations of the existing Green Belts boundaries.

I object to this policy on moral and national grounds. Our surrounding nature and villages are the assets that should be protected not only for the sake of our own, but also for generations to come. It will be impossible to undo the damage.
inflicted once Green Belt boundaries are removed, opening up the area to developments that are for over-ambitious and
distractive to the local nature and culture.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15280  Respondent: 11007393 / James Culmer  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and
should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is
gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of
future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly
protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public
consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the
borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage.
The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken
out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to
justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national
guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional
circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be
taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances
required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have
answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing
exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from
the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should
be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green
Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and
nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites
than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped
land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan
rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider
this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and
the consultation period restarted after the correction has been given the same distribution as the original statement. (I
assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that
the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of
these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that
infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It
is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing
development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the
NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored.
Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems
almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the
Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I
cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could
quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of
opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their
surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as
an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield
(A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires
there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt.
There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ’special
circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging
into one another. The significant development in these villages will result in the character of these villages being lost and
the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support
including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common,
with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to Send being removed from the Green Belt with vulnerable areas of land being proposed to be taken out of the Green Belt including the land behind the school including the playing fields and woodland, the land to the right of Carbridge by the River Wey Navigation and the land left of Carbridge going up to the old depot on the Wey Navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I wish to register objections to the Local Plan on a number of counts.

**Green Belt**

The National Planning Policy Framework states that the Government attaches great importance to the Green Belts; the fundamental aim of which is to prevent urban sprawl by keeping land permanently open. I strongly object to the changes to the Green Belt which are proposed and specifically to the exclusion from the Green Belt of the former Wisley airfield site and ‘insetting’ of East Horsley, West Horsley and Effingham villages.
I find the arguments proposed in 4.3.12, 4.3.14 & 4.3.16 of the Local Plan to be fundamentally unsound. I cannot see any justification for the former Wisley airfield site to be excluded from the Green Belt and I consider the ‘inserting’ of East Horsley, West Horsley and Effingham villages to be unacceptable. I consider both these proposals to be against the National Planning Policy Framework which states “once established Green Belt boundaries should only be altered in exceptional circumstances”. The status quo for the former Wisley airfield site and for these villages is that they currently are in the Green Belt. Ministerial Guidance on the Green Belt makes it clear that legally unmet housing need alone is unlikely to qualify as “exceptional circumstances”. I firmly believe the former Wisley airfield site and East Horsley, West Horsley and Effingham villages should continue to lie within the existing Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1750  Respondent: 11009057 / Lucy Fairley  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I wholeheartedly disagree with the statement “The Metropolitan Green Belt will continue to be protected, as shown designated on the proposals”. Given the changes to the Green Belt which are proposed, I cannot see how Guildford Borough Council can claim to be championing the Green Belt in any way, much to my dismay. I firmly believe East Horsley, West Horsley and Wisley Airfield should continue to lie within the existing Green Belt.

The NPPF states that the Government attaches great importance to the Green Belts; the fundamental aim of which is to prevent urban sprawl by keeping land permanently open - “once established Green Belt boundaries should only be altered in exceptional circumstances”. The status quo for West Horsley and East Horsley is that they are currently in the Green Belt. Ministerial Guidance on the Green Belt makes it clear that legally unmet housing need alone does not qualify as “exceptional circumstances”.

I object to the creation of a new settlement at Wisley Airfield as outlined in the Spatial Vision and its inclusion as a “strategic development site” in 4.1.9. The NPPF states that sustainable development means achieving growth while “ensuring that better lives for ourselves don’t mean worse lives for future generations”. The area around Ockham is beautiful countryside and important farmland. To develop this area would be absolute desecration and destruction of the NPPF principles, resulting in the loss forever of this rural landscape and more importantly the wildlife and plant habitats. It is not a sustainable location given the lack of amenities and transport – Ockham is a small settlement with no infrastructure. I do accept the need for further housing but it MUST be development of brownfield sites within developed areas. (We do not have an infinite number of natural habitats left in the overdeveloped South East to destroy with impunity!

Policy P2 of the Local Plan clearly states “We will continue to be protected the Metropolitan Green Belt, as shown designated on the proposals Policies Map, against inappropriate development. In accordance with national planning policy, the construction of new development will be considered inappropriate and will not be permitted unless very special circumstances can be demonstrated.” The Local Plan’s proposal to include the Former Wisley Airfield as a potential development site is completely contrary to this statement and I object strongly to such a large scale expansion into the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9738  Respondent: 11009281 / David Foot  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I entirely reject the proposal to take the villages of East and West Horsley out of the Metropolitan Green Belt. Your proposed Local Plan claims to protect the Green Belt—not just some of it.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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I have commented before on the Council's proposal to take the village of East Horsley out of the Green Belt (what you call insetting) and the very ambiguous statement that the Green Belt is being protected in the proposed Plan. That is clearly not happening, and a more plausible and honest statement of Green Belt policy needs to be stated in your Plan if is still your intention to remove the Green Belt status of this village in the face of many objections. Along with this, you are proposing to increase the area to be "inset" beyond the boundaries of the existing settlement area in order to maximise the area available for building on the fringes of the village. However I wish to comment more specifically on what appears to be a new proposal in your targeted consultation. This is to extend the settlement boundary in East Horsley to the south of the A246. While I am pleased to see this area is not threatened by Green Belt removal, the proposal you are making is difficult to comprehend on the maps - the various Appendix H maps for East Horsley South - and is largely unexplained in the text. It seems to have been 'bounced in' to the Plan at the very last minute. One of the main components of this potentially increased settlement area is Chalk Lane and its environs. The Lane is a scenic and archeological feature of the village, being an old drove road probably dating from pre-historic times. The proposal to include this sensitive area within the new settlement area boundary will put at risk the unique character of the area. It is very likely to promote unsympathetic mulling and extensions to properties, and new and larger accesses that destroy the chalk banks and degrade the whole character of this part of the village. I therefore strongly object to the movement of the Settlement Area Boundary south of the A246 which is proposed under the various East Horsley South maps in Appendix H which you are proposing as part of Policy P2.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Once again I am writing to object to the proposed building in the Send area on Green Belt land.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>11010081 / Julian Colborne-Baber</th>
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Greenbelt:

My first objection to the Local Plan relates to the protection of the Greenbelt. I am absolutely opposed to the removal of some of the village from the Greenbelt through the extension of the settlement boundaries and the insetting. No Exceptional Circumstances or other relevant justification has been demonstrated to justify the new Greenbelt boundary in West Horsley. National planning policy requires that Green Belt boundaries are only amended in exceptional circumstances and that this must be undertaken as part of the Local Plan process. As such the proposal and Policy P2 is not in line with National Planning Guidelines. It is clear to me that it cannot be considered exceptional in order to facilitate the development put forward when a) The Guildford Borough Economic Strategy 2013-2031 makes no case for locating large numbers of homes in West Horsley (or neighbouring villages) (indeed the new economic development sites are located on the other side of the borough to West Horsley) and b) when the current proposals have given insufficient consideration of the use of brownfield sites within the borough (located much nearer centres of employment and supporting infrastructure). This is a key flaw in the Guildford Borough Submission Local Plan 2016 – proposing extensive development in locations remote from areas of employment and supporting infrastructure. The new housing should largely be allocated much nearer and around Guildford’s town and urban areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/9118</th>
<th>Respondent: 11010145 / Julian Ottaway</th>
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Ref Proposed overdevelopment in Send and surrounds

1, I object to the removal of Send from the Green Belt, it is a village and should not be part of an urban sprawl of Guildford and Woking. The Green Belt was promised as a permanent buffer and both councillors and government have promised to maintain it. Therefore it is the elected councils duty to comply with the promises made to the electorate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/3088</th>
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The loss of swathes of the Green Belt is a betrayal of residents (voters) who have moved to the area because of its proximity to protected countryside. We are in danger of creating an “A3 Corridor Conurbation” that could ultimately spread closer and closer to London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/7549</th>
<th>Respondent: 11010401 / J M Bates</th>
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I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.
This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I object strongly to the following proposals in the village of Send listed in the Local Plan:

1. Removing Send from the Green Belt

I object to Send losing its Green Belt status

I do not understand how you have the right to change the Green Belt. It was meant to be a permanent feature designed to stop towns and villages merging into one huge conurbation. Also its purpose was to encourage the use of derelict and other urban land. I don’t believe that there is an urgent need to change the status when there are still brown field sites in the borough. Is this a government ruling of a financially driven move that will allow property developers to make a lot of money? We have already lost the only piece of woodland in the village when permission was recently granted to build on the land behind Vision Engineering.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8815  Respondent: 11011585 / Martin Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the removal of Send from Green Belt status and to the proposals to build on the Green Belt fields at Gosden Hill, Garlick’s Arch, Send Hill and Clockbarn Nurseries, particularly Sites A25, A35, A42, A44 and A43. NPPF states that the Green Belt should only be altered in “exceptional circumstances.” There simply are no eligible exceptional circumstances expressed in the Local Plan or supporting documents. The Council must identify the urban brownfield areas around the Guildford area in order to protect the countryside and limit the impact that any plans have on local road traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/758  Respondent: 11011713 / Mary Warren  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy 2 Paragraph 4.3.15 Removal of Send Business Park from the Green Belt. As already stated in the above objection, Tannery Lane is a narrow winding road completely unsuited to large HGVs. Already they cause considerable traffic problems and any increase in their number along this road will bring traffic to a standstill both in Tannery Lane and at its junction with the A247. The other exit from Tannery Lane is equally difficult and again unsuited to heavy traffic.

In conclusion, Send residents objected strongly to the previous version of the local plan. Despite this, the load on Send has increased. One has to wonder why Guildford Borough Council should single Send out for such over development when there are vacant brown field sites in Guildford and at Slyfield. No changes are proposed to the roads, schools, medical facilities or other essential infrastructure and the result will mean that Send becomes an overdeveloped suburb of Guildford with congested roads and traffic at a standstill pumping fumes into the air and damaging children's lungs. Is this really what they want?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
There is no evidence that there are exceptional circumstances for encroaching on our green belt and this plan is not wanted by the vast majority of people who live in this area. This plan will irreparably damage the rural and quiet nature of our village life.

I am totally opposed to the village's removal from the Green Belt by insetting and extending the 2003 Local Plan Settlement Area boundaries. No exceptional circumstances or other justification is made for the new Green Belt boundaries that will result from the proposed insetting of the two parts of the village from the Metropolitan Green Belt. West Horsley's defined Settlement Area boundaries (ref 2003 Local Plan) DO NOT need to be extended.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I wish to raise the following objections to the draft local plan:

I object to the removal of Send and Ripley from the Green Belt because the villages and their countryside provides a necessary buffer between Woking and Guildford. One of the purposes of the Green Belt is the prevention of merging of towns and settlements thereby creating unrestricted sprawl. If these villages were removed from the Green Belt in time there would be continuous development between Woking and Guildford. 70% of the sites put forward in the Local Plan are in the Green Belt which flies in the face of current government planning policy. The National Planning Policy Framework (NPPF), National Planning Policy Guidance and case law make it clear that Green Belt is an absolute constraint on housing supply. Exceptional circumstances need to be shown to adjust boundaries. They have not been shown by Guildford Borough Council. I object to Policy P2 green belt which states that “the general extent of the Green Belt has been retained.” This is completely false.

I object to the building on the Green Belt at Send at Garlick’s Arch, Clockbarn Nurseries and Send Hill because it is not justified by any special circumstances and the fact that Green Belt is meant to be permanent and not continually eroded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
seem to be aimed solely at increasing the land available within the settlements for future additional development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Green belt expansion

1. The proposed area for the expansion in West Guildford is green belt. The underlying thesis behind a green belt designation is that it should be preserved for the future. Re-classifying sites as green belt in order to compensate with the removal of green belt status elsewhere is at least inappropriate and disingenuous. More realistically it is bordering on fraudulent – the designation of the site as green belt is understood by the general population (or even the man on the Clapham omnibus in legal parlance) to be a long-term designation not given or removed lightly. This proposal treats the designation with disdain and when the wider population understand what has been done there will be general shock and resulting contempt for the town planners and councillors. This proposal is completely inappropriate and particularly for sites such as Blackwell farm which are sites of exceptional beauty and home to varied wildlife – it is simply not possible to lift and drop this flora and fauna into a new area without significant damage being done to it. The fact that the university is supportive of expansion, thereby making this site easier to develop, does not mean that the simplicity of approach should over-rule the impact of the development on this special area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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</table>

The detailed arguments relating to the impact upon the various elements of the infrastructure have been well rehearsed elsewhere. Suffice it to say that transport (road, rail and parking), medical, educational and shopping facilities are already under considerable strain. The increased volumes of traffic that would arise from the proposals have the potential to generate considerable hazards to local schools, pedestrians and junctions. The Raleigh School is oversubscribed and the Medical Centre is inundated. The addition of a significant number of new dwellings to the area would be unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/13988</th>
<th>Respondent: 11014145 / John Brown</th>
<th>Agent:</th>
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</tbody>
</table>
As I understand it the Green Belt may only be challenged in exceptional circumstances. No-one would view building on the Green Belt in West Horsley an exceptional circumstance when there are viable options for additional housing throughout the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15944  Respondent: 11014753 / Ian Peel  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I wish to object vehemently to the Guildford Borough Proposed Submission Local Plan: Strategies and Sites June 2016. Your proposed submission local plan is so offensive that it is hard to know where to begin my objections.

I object to your proposal to remove the Horsleys from the Green Belt. The Green belt has prevented planners and developers from "concreting over" the South East for 5 decades. Your ignorance, arrogance and short-termism in wishing to remove this precious protection is breath-taking. How can you live with yourselves and the prospect of being the destructive group who initiated the despoliation of the beautiful county of Surrey? Vandalism on this scale is not just justified by current housing needs. I note that you are not prepared to reveal the mathematical models used to support the SHMA underlying this plan. You seem to have singled out West Horsley for 35% population growth - more than anywhere else in the Borough, for no sensible or stated reason. Nor have you shown any other "exceptional circumstances" required to diminish the Green Belt and remove West Horsley from it. You have also extended the boundaries of the Settlement areas of the Horsleys for no apparent good reason.

When these precious green spaces are gone, they are gone forever. Don't have this environmental devastation on your consciences. Your proposals are ill-conceived, unsympathetic to the character of this part of Surrey, and completely unsustainable. Please re-consider them radically and urgently. I vehemently object to them all.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2448  Respondent: 11014881 / Linda Peters-Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy P2 - Green Belt

I object and disagree.

We should not allow the relatively short term 15 year plan spoil the legacy of future generations.

Once gone the Green Belt is gone forever.

The general extent of the Green Belt has not been retained which is stated in the policy.

The policy omits any assessment of the value of the Green Belt. The policy severely understates the loss of Green Belt land.
The required housing allocation should be spread across the borough and not burdened in one part on Green Belt land which will put strain on infrastructure and change the character of these settlements.

Developers will want greenfield sites as building costs will be lower. 8086 houses are proposed for Green Belt compared to 1135 for the Guildford urban area which is inequitable, will destroy the Green Belt and disincentives Urban regeneration.

The policy makes all villages in the green belt vulnerable to large blocks of new development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16456  Respondent: 11015329 / Nick Riederer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I would like to register my objection and discontent regarding the impact of Guildford Borough Council’s current Draft Local Plan and in particular object to its impact on West/East Horsley and its immediate environs and its disregard for the existing designation of Green Belt Protected Areas for which I believe no valid case has been made or exceptional circumstances proven. The proposed level of development disregards the National Planning Policy Framework that requires new residential development to respect the character and density of housing in the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/2078  Respondent: 11015329 / Nick Riederer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. Firstly I object to the fact that no changes have been proposed since the 2016 consultation to the insetting of West Horsley and East Horsley from the green belt despite numerous objections at the time.
2. I object to the very large number of new dwellings proposed on Green Belt. Whilst the reduction in the number of new homes proposed in the Green Belt after the 2016 Consultation, is welcomed (90 in West Horsley, 1100 in Normandy and Flexford) I believe that the case for building on Green Belt land at all is not proven and should be rejected in entirety.
3. I object to the revised proposal that the eastern side of the West Horsley Borough is now scheduled to take an even greater proportion of new homes in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1849  Respondent: 11015489 / Lorraine Pipe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
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<th>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</th>
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</thead>
<tbody>
<tr>
<td>Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings</td>
</tr>
<tr>
<td>As a local resident in Ockham, I object to the draft Local Plan for the following key reasons:</td>
</tr>
<tr>
<td>1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.</td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<tr>
<td>Local Plan Consultation</td>
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<tr>
<td>I am writing to OBJECT to the local plan in respect of Send Village. In particular:</td>
</tr>
<tr>
<td>I OBJECT to Send Village being removed from the Green Belt. The purpose of Send’s Green Belt is to prevent Woking and Guildford become one sprawling conurbation, to provide ‘breathing space’ between these two very different towns. This Green Belt was intended to be permanent, as stipulated in the National Planning Policy Framework. There are no special circumstances that permit any deviation from the original intention. In addition, local councillors and central government gave a clear election promise to protect the Green Belt. Any Honourable individual worthy of public office would not break such a promise, particularly when viable alternative solutions exist.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<th>Comment ID: PSLPP16/8744  Respondent: 11023009 / Julie Atkinson  Agent:</th>
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<tr>
<td>I object to the policy to remove the Horsleys from the greenbelt. The greenbelt is extremely precious and an essential part of our environment. We have a duty to protect the greenbelt and it is unthinkable to remove our village as proposed. It is part of the character of our village and it protects cities from unrestricted urban sprawl. One of the legal purposes for green belt is to check the unrestricted sprawl of large built up areas – without green belt Horsleys would very soon merge into Clandon and ultimately Guildford. 70% of planned development is on greenbelt and ALL of the development in Horsley on greenbelt.</td>
</tr>
</tbody>
</table>
This policy is flawed and should have been amended. The last consultation revealed 1,322 people against this policy. The only people for green belt development are land developers and local councillors – those set to gain from the development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/5769</th>
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<th>Agent:</th>
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Development

Assuming that there is a need for some expansion, use Brownfield sites rather than on the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/5771</th>
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I am fearful of what is proposed will do to Guildford. The Local Plan as proposed should be rejected. Growth is required but NOT to this extent, and NOT before the need for expansion has been challenged.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/16634</th>
<th>Respondent: 11023105 / Ian &amp; Rosemary Spence</th>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<th>Comment ID: PSLPP16/17726</th>
<th>Respondent: 11023489 / Trevor Pound</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

My objections to the Draft Local Plan are as follows:

1) I OBJECT TO all erosion of the Green Belt.

A brief read of the Green Belt section on the government website highlights several crucial points and indicators for local authorities which have been established over many years, to safeguard rural areas from urban sprawl. I draw your attention to several areas in said literature:

-the government stance outlines that Green Belt's should only be encroached upon in "very special circumstances"

-such special circumstance "will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations"

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17727  Respondent: 11023489 / Trevor Pound  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

-exceptions include "LIMITED infilling in villages..."

Whilst these are only a few of the points I could have selected from the government's website, they act to completely invalidate the thinking behind the 2016 Draft Local Plan. It is not only completely laughable that "exceptional circumstances" should be claimed with regards to this area, but more importantly, even if such circumstances did exist, the government website clearly states that such circumstances allow for LIMITED infilling of villages. The housing proposed in the local area is by no means "limited" and will cause complete overcrowding of the area and a wholly inadequate provision of local services.

In proposing this plan, the local authority has shown a complete lack of understanding not only of the purpose of the Green Belt, but of the terms on which it was created.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1034  Respondent: 11023489 / Trevor Pound  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
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On principle, I reject the building on any greenbelt land. The laudable purpose of establishing the green belt was to stop the relentless sprawl of urbanisation and ribbon development and provide some secure green spaces for the enjoyment of both local residents and city dwellers. To concede this just because there is pressure on building land is like taking down flood defences in case they get damaged in future floods! It negates the vision and those who had the good sense to see the future threat to our countryside.
As such, I strongly object to the erosion of green belt land at Send by taking out of the Green Belt Send Business Park (Policy 2 at paragraph 4.3.15), developing Land at Burnt Common (Policy A58), building on Garlick’s Arch (policy A43) and building at Clockburn Nursery, Tannery Lane (Policy A42).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Send Business Park (Policy 2 at paragraph 4.3.15):

To develop this site further would be to the detriment of what is a pleasant and predominantly rural stretch of the River Wey navigation.

I often cycle use Tannery Lane as part of a recreational route I use and appreciate, therefore, just how unsuitable Tannery Lane is for Commercial Traffic being a narrow country lane with poor access at both ends.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<th>Comment ID: PSLPP16/2044</th>
<th>Respondent: 11023585 / Jean Walker</th>
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3. I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<p>| Comment ID: PSLPP16/294 | Respondent: 11024225 / Julian Harnor | Agent: |</p>
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<tr>
<td>I object to the erosion of Green Belt and in particular, villages being inset from the Green Belt, as this is an irreversible process affecting quality of life for future generations.</td>
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<tr>
<td>I object to the proposal to inset Send Business Park from the Green Belt because:</td>
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<tr>
<td>It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation</td>
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<tr>
<td>There is highly restricted vehicular access along Tannery Lane in both directions</td>
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<tr>
<td>Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate</td>
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<td>There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt &amp; Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.</td>
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<td>Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.</td>
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<tr>
<td>I Object to Send being removed from the Green belt Because it is a buffer between Guildford and Woking I do not want the area to become a suburb. We need to protect the Green belt land for everyone to enjoy. It can never be replaced once it is lost. Look what has happened to the area around Woking you could be in London. Please let my comments be seen by the Inspector.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<tr>
<td>I object to the land around St Bedes school being taken out of Green belt land as this would mean an opportunity for developers to move in. The land should be returned to land for everyone to use. I would like my comments to be seen by the planning inspector.</td>
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<tr>
<td>I object to the policy of inserting Send Business Park from Green belt because the access is very restricted in Tannery lane and an increase of development would only increase traffic.</td>
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<th>Comment ID: PSLPP16/2890</th>
<th><strong>Respondent:</strong> 11024769 / Sarah Runton</th>
<th><strong>Agent:</strong></th>
<th><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</th>
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I object to this plan because over 70% of new housing is to be built within the Green Belt. There is ample brownfield land in the urban areas that needs to be regenerated. This can be achieved without the need to encroach on protected Green Belt land. Once the Green Belt has gone, it has gone forever and blatantly ignoring it now gives license to continue to do so in future.

I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6730  Respondent: 11024769 / Sarah Runton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to this draft Local Plan for the following key reasons:

I object to this plan because over 70% of new housing is to be built within the Green Belt. There is ample brownfield land in the urban areas that needs to be regenerated. This can be achieved without the need to encroach on protected Green Belt land. Once the Green Belt has gone, it has gone forever and blatantly ignoring it now gives license to continue to do so in future.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/31  Respondent: 11027201 / Stephen Clarke  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I was born in Guildford, as were my parents and all four Grandparents.

I am appalled at the new local plan and wish to object to it in the strongest possible terms.

The amount of proposed Greenbelt land to be given up for development is scandalous and clearly against the wishes of the vast majority who live and work in the Borough.

I strongly urge the council to reconsider this part of the plan and to prioritise Brown field land for both residential and commercial development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6153  Respondent: 11027201 / Stephen Clarke  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing to register my sincere objection to proposed building on Greenbelt land within the Borough.

It is supposed to be protected as a matter of National and Local policy and at a time of perceived pressure to build new homes, its purpose of preventing urban sprawl is more important than ever.

Furthermore, it seems that Brownfield sites within the Borough are sufficient to provide all reasonable housing needs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6156  Respondent: 11027201 / Stephen Clarke  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the 2016 Draft Local Plan

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8027  Respondent: 11027489 / J Pamplin  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am hoping that my six grandchildren will benefit from the Green belt I have enjoyed and strongly object to this unjustified proposed development that will destroy our rural environment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15513  Respondent: 11027649 / Phyllis Charteris-Black  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Insetting of East and West Horsley

I made the point in my original letter that the ‘insetting’ of certain villages, instead of them being ‘washed over’ by the Green Belt, and changes to the Settlement Boundaries of certain villages, were major and important changes that could significantly impact the future of the villages concerned and I still believe that there was not sufficient prominence given to this issue in the Issues and Options document and so the consultation process was therefore flawed and so the present new Proposed Submission Local Plan cannot be replied upon as a result.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<th>Comment ID: PSLPP16/11220</th>
<th>Respondent: 11028257 / David Conisbee</th>
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<td>Following the recent plans I am writing to object to a number of the proposals listed.</td>
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<td>I deeply object to the proposal for the Send Green Belt to be removed. As far as I was aware central government and local councillors gave clear election promise that this land would be protected. Loss of this land will mean developers will be quick to take advantage and this is something that certainly needs to be avoided. This belt provides a buffer between Woking and Guildford which prevents it from becoming one conurbation.</td>
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<td>I OBJECT TO THE IMPACT ON THE GREENBELT STATUS OF THE VILLAGES</td>
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<td>• <strong>I OBJECT</strong> to GBC’s plan to remove Send and Ripley from the Greenbelt. The precious Greenbelt is not just a ‘nice to have’, but is an inalienable public good including space for rural leisure and tourism activities, flood control and benefits to public health. Once the greenbelt is built on, it will never be reinstated. The Local Plan seems to be prepared to ‘ride rough shod’ over the Greenbelt, even to the extent of losing ancient woodland at Garlick’s Arch.</td>
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<td>• <strong>I OBJECT</strong> to GBC’s plans to allow ‘insetting’ the villages from the Greenbelt and infilling within village boundaries. This will erode the pockets of Greenfield sites around Send and Ripley and will result in an urban sprawl, effectively linking Woking and Guildford. I understand, and support, the appropriate use of brown field sites to build additional housing as required for the local population. However, the Local Plan appears to be...</td>
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taking the easy and cheaper option, of eroding Greenbelt, rather than actively searching for opportunities within urban Guildford where the infrastructure is already in place to support the resultant increase in population.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/2550  Respondent: 11028481 / Emma Rowland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Green Belt, Policy 2 at paragraph 4.3.15

Send Business Park now taken out of the Green Belt altogether

I object to the proposal to inset Send Business Park from the Green Belt because:

- With the new Marina planned on the Wey navigation, removal of this area will facilitate the total erosion of the greenbelt in this area through the infill of further buildings in the future.
- It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation
- There is highly restricted vehicular access along Tannery Lane in both directions as well as limited access to the already busy Send Road.
- Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2144  Respondent: 11028737 / Sue Kershaw  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

2. I object to not protecting the Green Belt (Policy P2)

Our Green Belt is precious. It is what protects London from urban sprawl; it preserves air quality; it prevents flooding; it is the city's playground. It is for us to conserve and protect it. There are 5 legal purposes for Green Belt, and it meets them all:

- To check the unrestricted sprawl of large built up areas
- To prevent neighbouring towns merging into one another
- To assist in safeguarding the countryside from encroachment
- To preserve the setting and special character of historic towns

To assist in urban regeneration by encouraging the recycling of derelict and other urban land. This policy is flawed and should have been amended. In the last consultation just six individuals, out of the c. 7,000 of those who took part in the consultation, supported the policy. Another 20 comments of support were from organisations such as: the University of Surrey, local councils (including Guildford), consultants (e.g. Savills) or landowners. But of the 1,371 who commented on the green belt policy 1,332 (97%) were against.
### 8. NO EXCEPTIONAL CIRCUMSTANCES

The local plan proposes nearly 9000 new homes to be built on Green Belt land (compared with - 50,000 current homes in Guildford, so approx. equal to 18% of the existing homes in the borough) - a huge proportion. The National Planning Policy Framework (NPPF) requires any change of Green Belt boundaries to demonstrate exceptional circumstances. Unmet housing need is NOT an exceptional circumstance in law. No exceptional circumstances have been disclosed. So the Green Belt boundaries should NOT be changed through the plan making process.

### 9. BROWNFIELD AVAILABLE

There is brownfield land available in the town centre which is being earmarked for commercial development rather than for housing. This is enough to meet our real needs for affordable local homes. There are enough vacant commercial sites to cope with genuine business need, and we've enough retail capacity already, so urban brownfield/derelict land should be used for housing.

### 2 Green Belt

It is absolutely wrong in my opinion to encroach on London's irreplaceable 'Green belt'. Apart from its amenity value, it plays an incalculable role in maintaining the environment, particularly good air quality and water management. Furthermore, it is not we, but future generations who will bear the burden of its abandonment to the developers, namely:

- the inevitable 'urban sprawl'
- the loss of the County's historic character
- the degradation of villages and smaller towns.

### What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
4 Alternative sites

There are 'brown field' areas in Guildford, on which commercial development is planned; yet there are numbers of vacant commercial and retail sites. Why not reallocated them to housing?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17253  Respondent: 11028929 / Christopher Webb  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Green Belt should not be built upon its the very reason that people want to live in or around Guildford as not only does in provide AONB but it provides for the separation between town and village thereby giving Guildford the identity that it has. Remove that and its just another clone town with all the innate problems that this brings. Loose the identity and you will erode the desire to live in Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/704  Respondent: 11029409 / John Lay  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

2.) There is no protection of the Green Belt ( Policy P2 )

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5629  Respondent: 11029409 / John Lay  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continuedInclusionn the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) -

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft local Plan for the following key reasons:
I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4229  
**Respondent:** 11029441 / David Tagg  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We had always assumed that it was the policy of GBC to "protect the Green Belt".

Given the current proposals, this does not appear to be the case!

We want our children & grandchildren to be able to enjoy the green open spaces we enjoyed as children & that we still enjoy now.

Do you want your legacy as our elected representatives to be "the Council who destroyed the character of East & West Horsley"?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4230  
**Respondent:** 11029441 / David Tagg  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

In conclusion, we object to the reduction of the Green Belt in general & the proposed excessive level of new housing in & around East & West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/2253  
**Respondent:** 11029441 / David Tagg  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I see from the revised "Local Plan (2015-2034) that the settlement boundaries of the Horsleys are still to be extended & removed from the "Green Belt". This is an absolute disgrace, the "Green Belt" is supposed to be the "Lungs of London"...with more vehicles & more pollution we need the Green Belt more than ever. Doesn't this Council listen to the people it's suppose to represent? It also appears to support the development of the former Wisley Airfield adding an
additional 2000 houses to the area & causing more pollution... Do you want to remembered as the Councillors who destroyed "Our Green & Pleasant Land" FOREVER! You won't be able to reverse it the future....... 

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3850  
Respondent: 11032129 / Claire Sinclair  
Agent: 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The opening statement of Policy P2 that “We will continue to protect the Metropolitan Green Belt” is blatantly disregarded all the way through this local plan. GBC appears to be in breach of this policy through the housing policies it has set out in the Proposed Submission Local Plan, whereby some 65% of developments will be made on land that is currently Green Belt. It is not a Government directive to build on greenbelt land as GBC present it and would have us believe. In fact Government guidelines say that greenbelt land should only be built on in. The local plan does not make nearly enough argument for ANY of the proposed greenbelt land developments to be considered ‘exceptional circumstances’. You have a duty to protect the greenbelt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3853  
Respondent: 11032129 / Claire Sinclair  
Agent: 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The schools are oversubscribed and full, particularly the Raleigh, (including the Howard, the only viable option for local secondary schooling in the state sector). There are no plans to increase secondary school provision! Where are all the children from the new houses going to attend school? All the other services are stretched to the max including doctors surgeries, dentist (only one NHS)in the two villages!!., not to mention the busy east Horsley station parade.

Drainage is already an increasing problem and each year the flooding gets worse in certain areas..some of which are right by the proposed developments. The developments would only exacerbate this situation. I1

[The proposed boundary changes would devastate the only open green communal area in East Horsley, Kingston meadows and other boundary changes are ridiculous in that they ignore natural boundaries which exist and are currently used (such as a deep drainage ditch) and would seek to move these to further the machinations of the developers. The arguments for the boundary changes are therefore invalid.

By changing the boundary to include area past the A246..and infilling in the spaces, you are threatening the green belt in the same way as new developments and I view this with the same scepticism and unless the boundary changes can be lawfully justified, they are invalid too.

Green Belt rules make it clear that unfulfilled housing need is not normally considered to be ‘an exceptional circumstance’. If it were the entire Green Belt would already be covered in tarmac. Also, every movement in settlement boundaries must be justified by ‘exceptional circumstances. Therefore most of these proposals should be thrown out because they could only be considered under exceptional circumstances and these do not exist and the proposals cannot be justified.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/3856  Respondent: 11032129 / Claire Sinclair  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

In all, the draft plan is flawed in the extreme and GBC’s insistence on forcing developments where there is no proven need and riding roughshod over laws put in place to protect our valuable green spaces must be prevented at all costs. This plan must be rejected apart from the areas which I have identified.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Comment ID: PSLPP16/10623  Respondent: 11032385 / Celia Guthrie  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Proposed Local Plan for a number of reasons listed below.

I object to Send Village being removed from the Green Belt. Councillors and central government gave an election promise to protect the Green Belt and this reneges on it. The Green Belt in Send helps Send to maintain its village identify and prevents Woking and Guildford merging into one big urban conurbation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Comment ID: PSLPP16/13324  Respondent: 11032513 / Mary Candy  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to all erosion of the Green Belt.

I object to any “in-setting” (i.e. removal) of any villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Comment ID: PSLPP16/4232  Respondent: 11032705 / Mike Tarrant  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
As a resident of Burnt Common, Send I object to the following proposed developments:

I object Policy P2. In-setting of Send and Ripley.

I object to taking Send and Ripley out of the Green Belt, I see no exceptional circumstances for this.

Vulnerable land includes, School playing fields and land adjoining the Wey Navigation Canal, a National Trust facility.

Also, Villages to the East of the A3 maintain Greenbelt status.

I object to building on ‘Green Belt’ land, which are the lungs of London. And are meant to prevent Urban spread in the countryside and the linking of settlements. In this case Send, Ripley and on a broader scale to Woking and Guildford.

Local and Central Government gave clear commitment that the green belt would be protected. These proposed development go against this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object Policy A25 Gosden Hill Farm, 2,000 houses, on Green Belt Land.

I object to Policy A35 Wisley Airfield, 2,000 houses in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the offsetting of any of the greenbelt, Policy P2. Once it is gone it is gone for good, there is no route back. This is why the act was passed originally to protect the villages and green spaces of England, if this plan goes ahead, Guildford will be joined to everywhere from the hogs back to the M25. The entire length of the A3 will become a corridor of unwanted houses instead of the green fields which are currently present. This proposal to concrete over farmland which only developers can ever benefit from comes at a time when the UN predicts the loss of farmland to climate change is not acceptable. Also the plans for Garlicks Arch have been added with less than two weeks notice, but the existing brown field site just to the south of Burnt Common, which has been removed.

I Object to develop to the building on land which is susceptible to flooding (Policy P4). The plan does not take notice of the National Planning Policy. Garlicks Arch is constantly flooding and is according to the Environment Agency to be at a higher risk of flooding than Guildford Borough Council’s estimate. This land floods regularly and the Councils estimate is not up to the standard required for this plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Policy 2 paragraph 4.3.15 states that Send Business Park will be taken out of the Green Belt. Why? There is restricted access by road to the site in both directions, it is next to the beautiful Wey Navigation and it detracts from the openness of the green belt.

I also object to the hiding of development by deferment A24, A25, A26, A43 within this version of the plan. These are concealed planned development and are designed to have two effects, to hide the true number of proposed properties being built with around 1100 hidden on A24, A25 and A26. Also, this looks to me to be an excuse to build on A43 Garlick’s Arch where developments are not needed. This is in my view dishonest. The proposed increase from 400 to 650 houses on this site is totally unacceptable and should not be allowed, especially as the plan in 2016 which was added into the plan during the meeting gave reasons that removing A58 Burnt Common started that “the site A43 location affords greater separation between Send Marsh/Burnt Common and the proposed site allocation at Gosden Hill Farm.... (site allocation A25) than the Burnt Common site did”.

Now that A58 has been added back into the plan, and the separation issue is clearly being ignored as both sites which are almost contiguous are now in the plan, it would appear that Guildford Borough Council are not following their own guidelines and objectives. Also as A58 is now back in the plan then the required floor space is allocated surely and there is no reason to build on Garlick’s Arch.

Guildford Borough Council claim to be building on Brownfield sites in preference to Green Belt, if this was truly the case why is Site A4 removed from the plan? This removed housing from the plan in favour of retail, which means Green Belt land will be used to allow retail development, this policy is totally unacceptable. Site A34 is also being removed from the plan, another Brownfield Site which should be contributing to housing.

I completely object to the council giving developers an “out” on affordable housing Policy 4.2.23 by allowing a payment in lieu to enable the same amount of affordable housing as would have been developed on site. Where in this plan is this affordable housing actually going to be built?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I specifically object to the Green Belt changes – Policy P2

There does not appear to have been any consideration to the value of the local Green Belt as a public and private asset. This is not just potential building land with additional restrictions it provides habitat for wildlife, the preservation of trees, much needed green space and areas of no pollution for our families to enjoy. There has been no consideration to the harm to public health on the removal of this land. I have seen this area flood multiple times and the development on the green belt will increase this frequency.

I have also been informed that the plan has allowed ruling Councillors to argue that there is an acceptable percentage of Green Belt that should be sacrificed to development, when no such rule exists in the NPPF. I was also informed that the plan ignores most of the NPPF 17 stipulations.

The plan has proposed a disproportionate amount of development to green belt land and very little in urban areas where a significant amount of the population want to live. 35% of the development being proposed for the Horsley's is also excessively high for one area to support without causing significant change.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1381  Respondent: 11033409 / Rebecca Fraser  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Loss of Greenbelt Land:

I STRONGLY OBJECT TO BUILDING ON GREENBELT LAND. It is of paramount importance that we continue to protect our green belt and open spaces, especially when there are brown field sites available in the UK for development.

Creeping development has led to almost continuous housing from Central London to Effingham. Is this to carry on to Guildford and beyond? (1,700 houses are planned for the Guildford end of the Hogs Back and 1,000 new houses on greenfield sites in Normandy.) If we continue to build on our countryside it won’t be many decades before we have none left.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4104  Respondent: 11033825 / Peter Heath  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Send Village being removed from the Green Belt. The Green Belt was land put aside by our ancestors in perpetuity for the best of reasons - biodiversity, as a bulwark against urban sprawl (in providing an essential Green Space in stopping Woking and Guildford becoming one conurbation), wild life corridors and human appreciation of nature, to name but a few. Apart from anything else, Local Councillors and Central Government have given clear election promises
to protect the Green Belt, as required by the National Planning Policy Framework - there are no "special circumstances" to justify abandoning it.

**What changes (2016)/ further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/17808  **Respondent:** 11033921 / Tim Depledge  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object on the basis of how this is being applied - The policy states "We will continue to protect the Metropolitan Green Belt", but, based on the proposals of housing locations, this policy is not being followed. Furthermore, it has been clearly stated that building on the Greenbelt may only be allowed in exceptional circumstances, and none of the elements in this plan, including meeting the arbitrary "needs outlined in the SHMA" are appropriate to be called "exceptional".

I fundamentally object to building on Green Belt land. Building on Greenbelt land can only be allowed in "exceptional circumstances", and the local plan does not come close to justifying exceptional circumstances. A broad brush statement in section 4.3.16 of the Local Plan saying "We consider that exceptional circumstances exist to justify the amendment of Green Belt boundaries in order to facilitate the development that is needed and promote sustainable patterns of development" is not justification for building the green belt, and certainly not in West Horsley. Green Belts are established in law and well ingrained into the society in which we live.

Section 9, Point 89 of the Governments National Planning Policy Frame outlines these "exceptional circumstances", and none of these apply to the extensive plans for new homes outlined in the Draft Local Plan. I also note that the Government is committed to safeguarding the Greenbelt.

The Local Plan places the majority of new home construction on Green Belt land in the next five years, and for the duration of the plan, how can this be possible? Brownfield sites should be the focus for growth. This is especially true when the economic growth areas of the borough are not in the areas where building is planned on Green Belt land.

Furthermore, once a Green Belt is infringed, this removes significant requirements for planning consent going forward, creating yet more disturbance and pain for residents in the future.

The same reasons outlined for removal of the Green Belt also apply to insetting of the Green Belt. There are no exceptional circumstances to inset the Green Belt in West Horsley. I understand the Parish Council has performed an analysis of housing demand within the Village and this is limited to a small number of homes, (<30) which can be accommodated without decimating the village through building hundreds of homes through insetting the Green Belt.

**What changes (2016)/ further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/6755  **Respondent:** 11033985 / John Peachey  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the removal of Send from the Green Belt because the village and its countryside provide a necessary buffer between Woking and Guildford.
I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford's urban brownfield areas much closer to existing transport hubs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/73  Respondent: 11033985 / John Peachey  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Policy 2 at paragraph 4.3.15.

Send Business Park now taken out of the Green Belt altogether.

It is an old non-conforming user in an area of outstanding countryside adjacent to the Wey navigation.

There is highly restricted vehicular access along this narrow winding lane.

This location is totally unsuitable for further expansion/development and it will detract from the openness of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1611  Respondent: 11034113 / Julia Gaudelli  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to not protecting the Green Belt (Policy P2)

   I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4839  Respondent: 11034817 / Nick Pycraft  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing to you to protest about the plans for building on Green Belt sites in and around Send and Send Marsh.
I object to Send being removed from the Green Belt (Policy P2). The National Planning Policy Framework (point 80) states that one of the purposes of Green Belt land is ‘to prevent neighbouring towns merging into one another’. Send village and its surrounding Green Belt land acts as the necessary buffer between Guildford and Woking.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12692  Respondent: 11034881 / Amy Carter  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? (), is Sound? (), is Legally Compliant? ()

Environment

I do not believe that the majority of residents would support expansion into (and the continuing shift of the boundaries of) the Green Belt, particularly not on this scale. The development seems to be 50-70% within the green belt - how can such an encroachment be morally acceptable to the council? This expansion will impact local wildlife, spoil views from the Hog’s Back and parts of the Downs, and have potentially dire effects on surface water flooding in Guildford due to loss of natural capacity for soak-away at a time when it is widely thought that our climate is becoming more unpredictable and extreme. Additionally, the new road for Blackwell Farm cuts through ancient woodland and the Surrey Hills AONB. The countryside surrounding Guildford is something we should be protecting for our children.

I also feel strongly that the council have been dishonest to repeatedly commit to protecting the Green Belt, or to promise countryside areas to the people of Guildford, and to then shift the boundaries or locations to suit its own aims; this has undermined my trust in the council, and in politics, generally. I fear even more for the protection of our countryside with the recent decision to leave the European Union.

There will also be impacts on visual amenity with the views from the Hog’s Back and North Downs blighted by huge numbers of buildings.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9913  Respondent: 11034913 / Alison Hutton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? (), is Sound? (), is Legally Compliant? ()

I object to the volume of houses proposed in the Borough to be built on land currently in the Green Belt.

1. Specifically that 65% of the new housing would be built on land at present in the Green Belt
2. Both Horsleys should remain in the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6966  Respondent: 11035361 / Marion Shipman  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Neither the policy nor the supporting Green Belt papers give any coherent justification for the proposed changes to the Green Belt. Indeed, policy H2 refers frequently to the quality of the countryside within the Borough. There are five legal purposes for Green Belt and our Green Belt meets them all. There are no exceptional circumstances that justify building the majority of the proposed new houses on Green Belt land or for insetting villages from the Green Belt. Green Belt preserves air quality and prevents flooding. The legal purposes for the Green Belt include:

- To check the unrestricted sprawl of large built up areas
- To prevent neighbouring towns merging into one another
- To assist in safeguarding the countryside from encroachment
- To preserve the setting and special character of historic towns
- To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

The National Planning Policy Framework (NPPF) requires any change of Green Belt boundaries to demonstrate exceptional circumstances. Unmet housing need is not an exceptional circumstance in law. The Plan has failed to disclose any exceptional circumstances to support such a change in boundaries and Green Belt boundaries should not be changed through the planning process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Horsley. I fear gravely that the actions of the Council in regard to development will lead to making areas such as Horsley not as attractive for them to live and bring up their children. I believe that East Horsley must not be inset from the Green Belt. I strongly object to the movement of the settlement boundary proposed under Amendment 4 in Appendix H map of East Horsley (South), proposed as part of Policy P2.

I understand the housing pressures and the need for the Council to provide affordable housing and lower cost housing, but I think Guildford borough has a unique challenge. Given the desirability of the area, the development of areas such as East Horsley will lead to additional supply but this won’t be affordable housing for most. Guildford is an expensive area and this challenge remains. I believe that Guildford needs to revise the number of dwellings proposed at Wisley airfield. The infrastructure (doctors; trains; parking; roads) cannot cope and no adequate solutions are proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1350  Respondent: 11035937 / Giles Reid  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Having read the revisions to the local plan I am writing to strongly object to the local plan as it currently stands. Whilst I recognise that there are improvements such as stopping the development of the Thatcher’s site, I am fundamentally opposed to any development of the green belt in the borough of Guildford or any proposal to inset East Horsley from the green belt.

I do not believe that Guildford Borough Council are taking into account the green belt when establishing housing targets. Guildford is a highly sought after area in a large part due to the mix of housing and green belt. The Council (and in particular the Councillors that have been elected by the electorate) has a moral duty to maintain the green belt to avoid establishing a precedent that destroys Guildford for future generations. The Council must not remove areas from the Green Belt, and I cannot see that this is direction being provided by central government to local government so the onus is on my local Councillors. I have lived in East Horsley all my life, and I am delighted to bring up my children in East Horsley. I fear gravely that the actions of the Council in regard to development will lead to making areas such as Horsley not as attractive for them to live and bring up their children. I believe that East Horsley must not be inset from the Green Belt. I strongly object to the movement of the settlement boundary proposed under Amendment 4 in Appendix H map of East Horsley (South), proposed as part of Policy P2.

I understand the housing pressures and the need for the Council to provide affordable housing and lower cost housing, but I think Guildford borough has a unique challenge. Given the desirability of the area, the development of areas such as East Horsley will lead to additional supply but this won’t be affordable housing for most. Guildford is an expensive area and this challenge remains. I believe that Guildford needs to revise the number of dwellings proposed at Wisley airfield. The infrastructure (doctors; trains; parking; roads) cannot cope and no adequate solutions are proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/521  Respondent: 11036193 / Wayne Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
If the Council fails to protect the Green Belt and constrain expansion to reflect the widespread concerns of residents regarding environmental and transport issues, the 2017 Plan will irreparably damage the very qualities that make Guildford an attractive place to live and to conduct business in.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to Policy P2 green belt. This policy states, “the general extent of the Green Belt has been retained.” This is a misleading statement. The policy wording is weak in support of the Metropolitan Green Belt even though the latter forms 89% of the borough and should be the cornerstone of all local planning policy. It is precious beyond the short-term demands of the present Government’s policy or a 15-year local plan. As noted under Policy S1 above, it is a solemn legacy to future generations – an asset and amenity that belongs as much to Londoners and the whole nation as to the people who live in it. Once gone it is gone forever. It is not the Council’s to give away. Policy P2 completely fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it has been around for a long time and it needs to be permanently protected. It was actually established in a local act of parliament in Guildford under the London Home Counties (Green Belt) Act 1938 and subsequently in the 1944 Greater London Plan to contain the outward sprawl of London. The boundaries of the Green Belt through Guildford Borough were later defined in the 1987 Local Plan, forming part of a 19-24km concentric belt around London. The Green Belt is intended to check the unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and other urban land. The principles of the Green Belt designation were outlined within Planning Policy Guidance 2: Green Belts (PPG2) and are found within the National Planning Policy Framework (NPPF). The Metropolitan Green Belt is an exemplar of good planning and the envy of planners throughout the world. Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. Building on it involves high opportunity costs, including an irreversible loss of:

1. Agricultural production
2. Rural leisure and tourism amenities
3. Water catchment
4. Flood control
5. Biodiversity
6. Natural heritage
7. A carbon sink for air pollution
8. Room for public facilities such as parks and burial grounds
9. Profitable film locations (e.g. Shere)
10. Future economic potential such as mineral extraction (even fracking)
11. Natural beauty, landmarks, open space, rural views and sight lines
12. Benefits to public health and wellbeing, physical and psychological (as well expressed in the NPPF) As a matter of law and national and local policy, these assets should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultations. It is quite incorrect to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold. I object to the “insetting” of 14 villages from the Green Belt. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost hell bent on self-defeat. I believe this policy is based on a flawed Green Belt and Countryside Study that, according to one Conservative Councillor, was irregularly commissioned by Council officers without the authority of Councillors. To “inset” two thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, although they would quickly destroy them if the proposed “insetting” and boundary extensions go ahead.

Furthermore I object on grounds of the impact this development will have in terms of congestion on our highways, these issues have been highlighted under ‘infrastructure’.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1005  Respondent: 11036321 / Vinciane Ollington  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. Destroying the Green Belt

I object to the proposal to remove (“in-set”) Ripley, Send and Clandon from the Green Belt.

No one in this county, let alone this nation voted for destroying the Green Belt. We already live in one of the most overcrowded parts of the country. Roads are congested, schools are full to capacity and hospital/medical center waiting times are forever deteriorating. Just to drive out of our village in the morning can take up to 15 minutes to cover a few hundred meters. This is stressful and will only get far worse with more houses.

We are filled with despair at loosing what we have worked all our life so hard for. We have worked hard to ensure our family lives in “England’s green and pleasant land” (something that was even shown as a virtue of our nation in the Olympic opening ceremony), away from the suburban sprawl. All this is in jeopardy with this plan.

By building more and more houses, this will not only further congest an already congested road network, but the overcrowding will create further pressure on schools, hospitals, and other services, all of which will require more people to be employed, which will probably result in a further round of house building and so on. What is GBC doing to consider the wellbeing of their constituents? Was not happiness and wellbeing also on our Prime Minister’s agenda?

High volumes of traffic and congestion have negative effects. These include road collisions, the severance of communities, the costs of delays and the unreliability of journey times to people and businesses. Environmental impacts...
include traffic noise, air pollution and amenity issues. At a global scale, vehicle emissions contribute to climate change. Some parts of the major roads in Surrey operate significantly beyond their capacity, resulting in traffic congestion, and forcing drivers down rural / country lanes to avoid main roads, leading to further congestion and road accidents.

If Surrey has a high quality of life and the borough is ranked as one of the least deprived 10 per cent of boroughs in England and one of the best places to live in the UK (Halifax quality of life survey, the Family Friendly Hotspots report), why is GBC looking to diminish this by proposing these plans?

Central London imposes congestion charges and astronomical parking charges in order to limit traffic and its associated problems in central London so as to afford its residents a better quality of life. Why can this logic not be applied to those living in Guildford Borough/Surrey? Why are GBC proposing the opposite in suggesting more houses be built?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/15514</th>
<th>Respondent: 11036385 / Alexander Allwood</th>
<th>Agent:</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>To keep this to the point i object to the proposed local plan. Building on the green belt is distroying the reason i love living in the area i live . What changes (2016)/further amendments (2017) do you suggest should be made to the document? Attached documents:</td>
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<th>Comment ID: PSLPP16/9100</th>
<th>Respondent: 11036417 / Len Ozanne</th>
<th>Agent:</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>I object to the latest proposals for the development of the Send area and the loss of the Green belt around the village of Send. What changes (2016)/further amendments (2017) do you suggest should be made to the document? Attached documents:</td>
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<tr>
<th>Comment ID: PSLPP16/7816</th>
<th>Respondent: 11036545 / Peter Bassett</th>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>Green Belt</td>
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<td>Green Belt</td>
</tr>
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</table>
The Green Belt designation of the site prevents the sprawl of the urban areas of Guildford, Woking, Leatherhead and the Metropolitan area. Previously developed parts of the site such as the runway, taxiways and the aircraft hardstanding are all open and, therefore, buildings on these areas will cause considerable harm to openness and the Green Belt. A new settlement would represent inappropriate development in the Green Belt, would cause significant harm to the character of the surrounding area and significant harm to the setting of a Listed Building. Development of this Green Belt site will discourage urban regeneration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3740  Respondent: 11036705 / Brian Slade  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY P2 REMOVING SEND FROM THE GREEN BELT. Send is an historic settlement dating back many hundreds of years and provides an essential buffer between the large urban conurbations of Woking and Guildford. Send contains areas of Special Scientific Interest as well as areas of natural beauty and ancient woodlands providing much needed habitats for wildlife - an amenity much enjoyed by Send residents as well as other GBC residents such as the Canoe Club. Without the Green Belt permanent protection afforded by the National Planning Policy Framework Developers would run riot - could not be stopped - and very quickly there would be no separation between Woking and Guildford as intended by central government in the NPPF to prevent the merging of settlements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/301  Respondent: 11036705 / Brian Slade  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Green Belt, Policy 2 at paragraph 4.3.15 - Send Business Park taken out of Green Belt because it is an old non-conforming user in an area of countryside of outstanding natural beauty which is also an area of special scientific interest adjacent to the Wey Navigation Canal; Tannery Lane has very restricted vehicular access in both directions; has major junction problems with the A247; is prone to flooding; and any further development of this area is inappropriate - not least because it detracts from the openness and effectiveness of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16180  Respondent: 11036737 / Charley Penny  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
• As stated in Policy P2 the Green Belt was implemented to ‘prevent urban sprawl’ and provide opportunities for people to access the countryside. By removing these local, rural villages from the Green Belt it will lead to urban sprawl and will mean the individual villages will lose their identity. The Green Belt area around Send and Ripley also act as an important buffer between the larger towns of Woking and Guildford.
• There are no exceptional circumstances as to why these villages should be removed from the Green Belt. I know a lot of people live in these villages to be closer to the countryside and they should be safe in the knowledge that the rural area they have chosen to live in is in the Green Belt and protected from large developments. Garlick’s Arch is also home to some areas of ancient woodland which are not protected as part of the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14583  Respondent: 11036801 / Judith Mercer  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I strongly object to the way this policy has been drawn up as it fails to robustly support the Metropolitan Green Belt, its value and the protection it is afforded by the NPPF and government statements. It makes up 89% of the borough. Support for this should therefore be at the heart of all local planning policy in the Guildford Borough. This policy on the contrary makes no such declaration of support for protecting Guildford Green Belt.

As already argued under Policy S1, the Green Belt is an important legacy to future generations, an asset and valuable amenity for Londoners and the whole country as well as for its current inhabitants.

P2 fails to assess the Green Belts value and treats it simply as potential land to be built on. It is far too precious an asset to be neglected in this way. The restrictions on the building on Green Belt enshrined in National law are there for many reasons. This draft plan risks, through unrestrained development, causing severe damage to the Green Belt and its environment. This involves impact on the following:

- local agricultural production
- rural leisure and tourism
- flood control
- water catchment
- biodiversity
- natural heritage
- carbon sink and air pollution
- room for public space amenities e.g. parks, burial grounds
- rural business
- natural landmarks and views
- future economic potential such as mineral mining
- natural beauty, landmarks, open space rural views etc
- harm to public health and wellbeing (expressed in NPPF as giving physical and psychological benefit-)
P2 seeks to allow excessive levels of development in protected areas ignoring views given in the last consultation and against policy issued in government statements in support of protecting the Green Belt. This precious area and amenity is not for the Council to give away. Councillors are arguing that there is an acceptable % of Green Belt that should be sacrificed to development. There is no such rule or justification for such set down in the NPPF.

It fails to take a fair approach by sharing out the burden of development between settlements according to and in proportion to their size.

Insisting on a disproportionate amount of development (most of it) to be in the Green Belt is counter productive and it would make better sense to develop new homes in the urban areas, including cheaper accommodation, where most people (Young and less well off) want to live and work. These areas could be regenerated in this way and fewer people need to commute, thus saving the environment as well, saving untold damage to the surrounding countryside which the whole nation can continue to enjoy. Once it is lost it is gone forever.

In particular, I strongly OBJECT to the "insetting" of 14 villages from the Green Belt. In their current state these villages continue to contribute significantly to the 'openness' of the Green Belt and their removal from the Green Belt has not been justified under this plan. No exceptional circumstances or other justification has been made to allow new Green Belt boundaries which would result from the proposed insetting. On the contrary, these villages should not be inset, because they represent the contribution to the purposes and aims of the Green Belt as specified in NPPF para.80. It includes the importance of protecting the openness of the countryside and the settlements within it. Not only should the Local Plan be aiming to protect the very rural nature of these villages (settlements) under these provisions, but also the Green Belt itself.

NPPF para.83 states that Green Belt boundaries should only be changed in exceptional circumstances, and in further guidance notes that housing need will not be regarded as "exceptional circumstances". Thus for my own village in West Horsley, the plan seeks to simply allow many houses to be built without any justification for them. As anyone who properly looks at the character of all the villages in their rural setting, they offer space air and light and the amenity we cherish for leisure and conservation of our heritage sites and wildlife. If we develop on these green spaces inside the villages they will be lost and so will the openness of the Green Belt area.

The policy ignores most of NPPF17.

The policy is based on a flawed Green Belt and Countryside Study, and it suggests that 2/3 of the boroughs rural villages should be 'inset' because they no longer contribute to the purposes of the Green Belt. This is completely ridiculous considering the location of the borough.

Further this study should not be relied on as I understand it was not commissioned correctly and without Councillor authority.

This policy states "the general extent of the Green Belt has been retained". This is not correct.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Policy P2 concerns the Green Belt. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. Primary legislation ensures protection for The Green Belt areas in perpetuity. This proposed policy appears to omit large chunks of the NPPF concerned with the protection of the Green Belt. Policy P2 has no mention of a commitment to uphold Green Belt boundaries and protections, or setting clear tests to scrutinise plans and proposed planning decisions without fear or favour. I include a large number of detailed comments here on the impacts and harms which will flow from the proposed policies:

- Impact on natural landmarks and views
- Impact on rural business
- Curtailment of space for public amenities e.g. Parks, cemeteries, recycling.
- Disregard of impacts to water catchment
- No mention of impact to the natural heritage.
- Protection of Biodiversity, one of the key outputs of the Green Belt, is missing.
- Guildford in general and the Horsley in particular have high levels of traffic pollution exacerbated by the proximity to the A3 and M25 and also by the huge increase of traffic levels on local roads. The Green Belt is a large ‘carbon sink’ which helps to mitigate this pollution.
- The proposed policy would have a devastating effect on air pollution, light pollution and climate change and has been discounted or ignored.
- Flood prevention and control is missing or ignored.
- Local agriculture is clinging onto its fingernails, with the current onslaught of ‘land-banking’ and subsequent rural decline. As the proposed policy is so widely drawn and weak, it will effectively allow any development on Green Belt land which is mainly agricultural. This is completely contrary to the provisions and spirit of the NPPF.
- The Green Belt has been the subject of many assurances of support and protection from government and planning law. The proposals in P2 contain no declarations of such support.
- The 12 Core Planning Principles set out in NPPF paragraph 17 cannot be ignored by policy P2. The proposals to change the Green Belt boundaries are simply an excuse to allow any type of building within the Green Belt. This is in my view illegitimate at best and represents a reversal of the intentions of the law. The Green Belt is not the property of the council to give away and cannot be treated as such. It is not something to be treated as available for building with only a few inconvenient restrictions.
- This proposed policy allows the argument that there is some proportion of the Green Belt which can be sacrificed to development. The NPPF allows no such argument.
- The amount of ‘Insetting’ of most of the villages around Guildford is unjustified and disproportionate. It is an attack on the value of the countryside and its contribution to the openness of the Green Belt. It is also an attack on the nature and conservation of the entire area.
- There is no objectively scrutinised and assessed development plan for Guildford post the referendum on 23rd June 2016.
- It makes no sense to concentrate most of the proposed development on the Green Belt when brown field sites are barely mentioned.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/1522</th>
<th>Respondent:</th>
<th>11036801 / Judith Mercer</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
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object to Policy P2 Green Belt because:

- It still completely fails to appreciate and acknowledge the importance and permanence of the Metropolitan Green Belt and the fact it has played a major part in planning in London and the Home Counties for a long time and that it needs to be permanently protected. It was established in 1938 under the London Home Counties (Green Belt) Act and then in the 1944 Greater London Plan to contain the outward sprawl of London. The boundaries of the Green Belt through Guildford Borough were defined in the 1987 Local Plan. It formed part of a 19-24 km belt around London and had very specific purposes, which are enshrined in the NPPF, and reinforced in the local plan. The aim and five purposes of Green Belt are outlined in NPPF section 9 paras 79 & 80. The Metropolitan Green Belt is a major model of good planning.

- Policy P2 omits any assessment of the value of the Green Belt. It is not just an empty space but is an inhabited working environment that safeguards a certain stock of natural capital. It is wrong for the Council to argue that the plan would involve the loss of “only” 1.5% of the boroughs Green Belt. This is misleading because really the amount is nearer to 7% when infilling, insetting and settlement boundary extensions/alterations are included. GBC have suggested incorrectly that this is acceptable. It is not, as there is no “acceptable” percentage (mentioned in the NPPF or anywhere else) of Green Belt which may be sold. Any amount of the Green Belt is a precious asset to be protected and kept because once it is gone it is gone forever.

- I object to the statement in the draft Local Plan under Green Belt Policy P2 (4.3.13) which claims that Send and a further list of 13 villages are “now inset from the Green Belt.” This statement is untrue as GBC is proposing to “inset” these villages. No decision has been made by an inspector so therefore the villages remain in the Green Belt.

- I object to the changed “insetting” of 15 villages (including Ripley) from the Green Belt and at “infilling” 12 of the borough's Green Belt villages.

- I strongly object to the proposal of settlement boundaries being vastly extended in many of the villages, especially in Send and infilling planned for outside the boundaries of 11 further villages. This is unplanned and unmeasured development outside of the Objectively Assessed Need (OAN).

- The local plan should not claim in the Policy for example, that parts of the villages with ribbon development contribute nothing to the “openness” of the Green Belt. This term is not defined by NPPF or in the draft. The Policy appears to be self-defeating by on the one hand saying that it will look after Green Belt land, whilst on the other fails to acknowledge the 5 tests of Green Belt status correctly. It is effectively using this Policy to allow all villages in Green Belt to be vulnerable to large areas of development which would be harmful to the Green Belt, ignoring its very importance to the residents and the borough as a whole.

- It is very short sighted of GBC to look at a village such as Send and conclude that in its “leggy” appearance that it doesn't contribute to the value of the Green Belt. Of course it does because it acts as a vital buffer between Woking and Guildford. It should not therefore be removed from the Green Belt. The village and countryside behind the A247 should all be protected, otherwise the two large towns will link up causing urban sprawl, which would be exactly against the fundamental aim of the Green Belt (para. 79 NPPF).

All other Green Belt villages in the borough are acting in a similar way and should be protected for the same reason, and for the other reasons set out in para 80 NPPF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<th>Comment ID: PSLPP16/10766</th>
<th>Respondent: 11037089 / Yan Lee</th>
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<td>• I oppose unjustified Green Belt development</td>
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<td>• Allowing Green Belt development to pay for transport schemes will simply add yet more traffic from more homes, fuelling congestion.</td>
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<td>• I do not think the Plan is ready for an inspector.</td>
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<td>As a resident of East Horsley since 2002, I object to the removal of the Horsleys from the Green Belt. I feel the plan has failed to illustrate that &quot;exceptional circumstances&quot; have been demonstrated.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<th>Comment ID: PSLPP16/11140</th>
<th>Respondent: 11037185 / Jonathan Parr</th>
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<td>Under no circumstances should Green Belt be built on. Green Belt was introduced for sound reasons and there is no justification to deprive future generations of their benefits.</td>
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<td>Sufficient sensible use of brownfield sites is not being made.</td>
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<td>There has not been sufficient consultation with local residents or their representative bodies.</td>
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<th>Comment ID: PSLPP16/1872</th>
<th>Respondent: 11037441 / Bryan Joseph</th>
<th>Agent:</th>
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<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

I note the plans to remove or to use the polite phraseology adopted within the plan to 'inset' a number of villages from within the Green Belt. I can see no justification for this. The Green Belt is designed to protect such rural villages from development or over-development. The rural villages each have their character and have managed their development locally. While I recognise that the Green Belt is a living and breathing artifact, there is no need for the creation of a 'free for all' with respect to in-fill and multiple fill development that will occur within the settlement areas of the villages once the green belt protection is removed. The nature of the villages, and in particular East Horsley where I live, is rural and peaceful. Its infrastructure is already strained with its existing population. I do not foresee affordable housing or even housing that takes into account the needs of an aging population or the increasing shift to mobile and other forms of work being served by the removal of the village from the Green Belt. This is especially disturbing with the presumption in favour of development that is mentioned in Section 1 of the plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1873  Respondent: 11037441 / Bryan Joseph  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

I am concerned that you make the assertion 'Exceptional Circumstances Exists inset villages from the Green Belt' without any description of what those are. Anyone can make an assertion, it is the supporting evidence that provides the justification and having read the plan I can find no supporting evidence that has been presented.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1874  Respondent: 11037441 / Bryan Joseph  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

As a supplementary to my previous comment, the council says that its policies will be outlined in its forthcoming Green Belt Supplementary Planning Document. No-one can support a plan on the basis of Trust Me - I will write something sensible. Furthermore, having 'inset' the villages from the Green belt the policies will not apply. The situation is perverse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3717  Respondent: 11037921 / C. H. Morris  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Secondly, the proposal to remove the Horsleys from the green belt appears disproportionate to the documented need for additional housing. Whilst, there is clearly some potential for limited development within the two villages, this needs to have the current level of scrutiny of new planning applications, if the essence of the local environments is to be maintained.

Thirdly, removing the green belt will make it too easy for builders to develop relatively low cost agricultural sites rather than more expensive brown fields or more innovative options such as building over the urban sections of the A3 and railways.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11162  Respondent: 11039105 / Robert and Judith Warren  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Sustainability and the Green Belt (Policy P2)

I object. The Green Belt is a highly valued asset and we are the custodians of it for today and future generations in the South East and London. Long-term sustainability is critical to such an asset and the draft Local Plan does nothing to uphold the Green Belt. Rather by stealing from the Green Belt to add settlement areas the Plan undermines Green Belt principles. The Green Belt is a covenant to protect the area in perpetuity not to be eroded for short-term gain.

- The Green Belt should be a cornerstone of local planning policy.
- The Green Belt cannot be replaced – once it is gone it is gone forever.
- It should not be in the gift of the Council to give away this asset that belongs as much to Londoners and the whole nation as to the people who live in it.
- The Plan does not assess the loss associated with taking Green Belt land; its working environment and its natural capital including flood control biodiversity, open space, rural views etc. as well as benefits to health and wellbeing.
- The Green Belt is protected by law and national and local policy. The Plan needs to recognise this.

All Green Belt sites should be removed from the plan until “exceptional circumstances” for development are proven, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4671  Respondent: 11039297 / Juliet Bradshaw  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

‘Protects our most important countryside, landscapes and heritage ’ - How does removing the protection of the green belt and building large number of houses safeguard our countryside and landscapes? If the plan allows the green belt to be eroded, how can it be stopped long term as the precedent is set. The recent proposals for developing Newlands Corner show the Council have a complete lack of understanding of what it means to protect the countryside (and I do not understand how the council could account for the financial figures it gave for its upkeep!). Also, the heritage of our
separate villages is to be replaced by conglomerates of housing areas vvear away our most important countryside, landscapes and heritage’ is a better description of this plan.

In particular, I object to the removal of West and East Horsley from the green belt, changes to the boundaries and the large number of houses proposed to be built. There are no exceptional circumstances for this change to the green belt. The disproportionate number of houses planned is a huge increase in density for our village and exacerbates the chronic issues of „ school places, surgery appointments, drainage and substandard roads. Also, Horsley railway station would have problems dealing with the increased demand and there is not enough parking in the area. Furthermore, the type of housing proposed will not address the true housing needs but will totally change the character of our village. The plan is unsustainable and destabilizing. In view of recent events, I hope the Council will really start to listen and act on views of its residents and perhaps find the true meaning of “sustainable”.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/7249</th>
<th>Respondent: 11040193 / Jill Stevens</th>
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I strongly object to the proposal to remove Ripley, Send, Wisley and Clandon villages from the Green Belt. The intention was for green belt to be permanent and allow for open space and a natural environment to prevail and not for more houses, which will create the joining of villages into a wider urban existence. Development will become inevitable and our rural villages will disappear for ever. 'Inset' of our villages must not happen, development should be on brownfield sites only.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/1161</th>
<th>Respondent: 11040449 / Rosalind Pollock</th>
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3/ I disagree strongly that building should take place on the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/15975</th>
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I object to not protecting the Green Belt (Policy P2)

Our Green Belt is precious. It is what protects London from urban sprawl; it preserves air quality; it prevents flooding; it is the city’s playground. It is for us to conserve and protect it. There are 5 legal purposes for Green Belt, and it meets them all:

- To check the unrestricted sprawl of large built up areas
- To prevent neighbouring towns merging into one another
- To assist in safeguarding the countryside from encroachment
- To preserve the setting and special character of historic towns
- To assist in urban regeneration by encouraging the recycling of derelict and other urban land.
This policy is flawed and should have been amended. In the last consultation just six individuals, out of the c. 7,000 of those who took part in the consultation, supported the policy. Another 20 comments of support were from organisations such as: the University of Surrey, local councils (including Guildford), consultants (e.g. Savills) or landowners. But of the 1,371 who commented on the green belt policy 1,332 (97%) were against.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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**1. NO EXCEPTIONAL CIRCUMSTANCES**

I object to the methodology of drawing up the plan also it appears that they have not taken into account the Surrey County Council highway planners’ views and the real risk of flooding in the area and the costs involved in improving the existing infrastructure. Furthermore, the plan has been formulated without regard to village neighbourhood plans. There should have been extensive consultation before removing the affected villages from the Green Belt, particularly the villages affected neighbour National Trust sites and Areas of Outstanding Natural Beauty such as the Sheepleas and Ranmore Common.

The local plan proposes nearly 9000 new homes to be built on Green Belt land (compared with ~ 5000 current homes in Guildford, so approx. equal to 18% of the existing homes in the borough) – a huge proportion. The National Planning Policy Framework (NPPF) requires any change of Green Belt boundaries to demonstrate exceptional circumstances. Unmet housing need is NOT an exceptional circumstance in law. No exceptional circumstances have been disclosed. So the Green Belt boundaries should NOT be changed through the plan making process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/6410</th>
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I OBJECT to all insetting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT TO SEND VILLAGE, RIPLEY, WISLEY AND CLANDON BEING REMOVED FROM THE GREEN BELT.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to this policy for the following reasons:

1. It does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local Planning policy. The Green Belt is not the Council’s to give away and once it is gone, it is gone forever. Sacrificing areas of the Green Belt to a developer-influenced growth agenda is a betrayal of future generations and does not constitute sustainable development. Green Belt was last taken in the 2003 Plan and now it is again proposed to move the boundaries.

1. The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the Plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

1. Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

1. The Countryside Study was a simplistic exercise based on the erroneous principle that ranking Green Belt land would identify candidates for development. The Council has not carried out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. This exercise should be based on the awareness that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently Planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brownfield sites.
1. **I object** to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt (a term which neither the Plan nor the NPPF defines) and there is no need to inset them. I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling, and that infilling is also proposed **outside** the settlement boundaries of a further 11. In effect, each village will become a nucleus for further development. The NPPF’s other four tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development.

1. To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead. This policy is wildly disproportionate in terms of any foreseeable development need and has caused intense opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

1. Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” This is misleading. Since the Second World War, Guildford has been expanding to the north east, starting with the Bushy Hill estate in the 1950’s, then Merrow Park and Weybrook Park were built on around 100 hectares of Green Belt land in the 1980’s, and now 89 hectares of land from the adjacent Gosden Hill Farm is also to be taken out of the Green Belt. This will connect to the proposed Garlick’s Arch development (30 hectares), also in the Green Belt, via several slip roads and feeder roads alongside the six-lane A3 (a further 4.5 hectares). If allowed, these two proposals will more than double the area of Green Belt land hitherto removed to enlarge Guildford’s NE suburbs.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** pslp171/1377  **Respondent:** 11041121 / Catherine Dean  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ) , is Sound? ( ) , is Legally Compliant? ( )**

**Policy P2 Green Belt - Objection**

The Plan states: “4.3.16 National planning policy requires that Green Belt boundaries are only amended in exceptional circumstances and that this must be undertaken as part of the Local Plan process. We consider that exceptional circumstances exist to justify the amendment of Green Belt boundaries in order to facilitate the development that is needed and promote sustainable patterns of development.”

- In the introduction to the Policy statement, numerous sites are taken out of the Green Belt including Gosden Hill, Blackwell Farm, Garlick’s Arch, Burnt Common, HM Prison Ripley Road, Send, and a number of villages. The Plan fails to detail the exceptional circumstances that have been identified for each site that is to be taken from the Green Belt.
- It appears therefore that the Plan is based on an assumption that because the housing number cannot be accommodated on brownfield or previously developed land in the Green Belt, it is legitimate to move the boundaries. A blanket change to Green Belt boundaries is being made to facilitate development. That is not in accord with the NPPF or ministerial statements.
Policy P2 Introduction – Objection

- The removal of Green Belt protection from the site of HM Prison, Ripley Road means that it could come forward for housing development. The nearest feasible access to the A3 is at the A247 junction.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9440  Respondent: 11041153 / Melissa Ransome  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the removal of any villages from the green belt (Policy P2). As requested by the National Planning Policy, there are no exceptional circumstances for Ripley, Send and Clandon, alongside the sites of Garlicks Arch (A43) and Wisley Airfield (A35) to be removed from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1898  Respondent: 11041281 / Chris Harlow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

3. I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a “special circumstance” and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16099  Respondent: 11041569 / Peter Belton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to removal of Send and other villages from the green belt. This can only be done in exceptional circumstances according to planning law, and none exist in this area. The interests of developers profiting from indiscriminate urban development are not exceptional circumstances.

Any weakening or exceptions to green belt protection will lead to its permanent loss. The green belt must be protected in its entirety, according to current law. It is the lungs of the densely populated south east, and an area that is enjoyed by millions, including valuable tourism from abroad.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1342  Respondent: 11041569 / Peter Belton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the local plan, on grounds that much of the development is on Green-belt land. The Borough does not provide sound evidence of need, and does not provide infrastructure improvement already needed and cannot be trusted to ensure sufficient investment in infrastructure to accommodate additional local development.

I object to removal or inset' from the Green-belt of Send and other villages in the Borough, or sections of land such as Send Business Park (Policy 2 at paragraph 4.3.15). This can only be done in exceptional circumstances according to law, for which none exist. This is deliberate erosion of the green-belt by stealth. Any exceptions made to green belt protection will lead to its demise. All green belt land in Britain must be protected in its entirety in perpetuity as the law intended and stands,

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2576  Respondent: 11041601 / Robert Bayley  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the changes to Policy P2

• Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital.
• It is quite incorrect to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold. No-one argues that we should sell 1.6% of the Crown jewels in order to build houses.
• I object to the changed “insetting” of 15 villages (including Ripley) from the Green Belt, and at “infilling” 12 of the borough’s Green Belt villages.
• I am deeply upset that settlement boundaries are to be hugely extended in many villages (particularly at Send) and that infilling is also proposed outside the settlement boundaries of 11 further villages. This is completely unplanned and unmeasured development outside of the OAN.
2 Loss of protection for the Green Belt. The draft Local Plan states that “We will continue to protect the Metropolitan Green Belt” and then is directly in breach of this policy as it proposes that 65% of housing will be built on land that is currently Green Belt.

Protecting Policies

Local Plan Policy P2 states that “We will continue to protect the Metropolitan Green Belt.”

However in direct contradiction to this the analysis in the Appendix shows that 65% of the developments proposed in the Local Plan are to be built on land currently within the Metropolitan Green Belt.

It has been repeatedly stated within government by different ministers that unfulfilled housing needs does not qualify as a special circumstance and our local MP Sir Paul Beresford has reiterated this in a letter of 21st June 2106 – “that Government Advice is unmistakeably clear – that housing need alone is *not* adequate grounds for building on the Green Belt.”

This was stated by GBC’ Planning Officer in assessing an earlier application for the Wisley site – “it has not been demonstrated that the benefits clearly outweigh the harm to the Green Belt”.

*I therefore object to Policy P2 on the grounds that it breaches central government policy.*

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
With reference to the Draft Local Plan published by Guildford Borough Council, I wish to **OBJECT** to the following proposals:

**I OBJECT to Send Village being removed from the Green Belt.**

The Green Belt was created to protect open spaces and prevent the indiscriminate growth of individual communities and loss of community identities. Politicians frequently promise to protect the Green Belt but this proposal is a clear breach of these hollow promises. There are no special circumstances that justify this breach of public faith in their representatives and officers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/18654  **Respondent:** 11042401 / Richard Gray  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Dear Sir/Madam

I would like to object to the proposal to change the Settlement Boundary so that it includes Fangate Manor, thereby removing Fangate Manor from the Green Belt. I am writing because of my concern relating to Green Belt and to Fangate Manor:

1. **We OBJECT** to the proposal to inset East Horsley from the Green Belt. The proposal to inset East Horsley from the Green Belt will be detrimental to the rural character of the village and should be dropped. The specific changes proposed are not justified under the National Planning Policy Framework rules.
2. We strongly oppose and **OBJECT** to the proposal to remove Fangate Manor from the Green Belt and include it within the Settlement Boundary. There are no exceptional Planning circumstances to justify removing Fangate Manor from the Green Belt, and changing the Settlement Boundary does not in any way enhance the defensible nature of the Settlement Boundary. It merely involves moving the boundary from one hedgerow to another, but leads to the loss of Green Belt and agricultural land.
3. There is an **ERROR** in the Land Availability Assessment dated February 2016, and we ask that GBC corrects this. There is a plan on page 299 that appears to show access to Fangate Manor from Manor Close. Manor Close is a private road, and access will not be granted. MCRA would oppose any change to the character of this very quiet road. The road and the verges are narrow and are not suited to any growth in traffic.

Please can you take my objection seriously as I find this to be very damaging to our local area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/11545  **Respondent:** 11042433 / Sam Thompson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to not protecting the Green Belt (Policy P2)
I object to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development. There is also an existing industrial site just past the Shell garage that could be extended rather than creating a brand new industrial site in Ripley/ Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12704  Respondent:  11042433 / Sam Thompson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development. There is also an existing industrial site just past the Shell garage that could be extended rather than creating a brand new industrial site in Ripley/ Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9657  Respondent: 11043041 / James Withers  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY P2: GREEN BELT: Object
● No exceptional circumstances exist which warrant removal of land from the Green Belt. Unmet housing need is not an “exceptional circumstance”.
● Socalled “insetting” of villages from the green belt is simply removal of more land from the green belt. GBC has a duty to use plain English to describe their proposals rather
than hiding behind unclear language.
- The Draft plan seems to priorities development on the Green Belt over brownfield sites in meeting future housing need.
- The Green Belt land is a precious asset and its loss is irreversible. It is our collective responsibility to protect it for future generations.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<thead>
<tr>
<th>Comment ID: PSLPP16/9660</th>
<th>Respondent: 11043041 / James Withers</th>
<th>Agent:</th>
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<tr>
<td><strong>Document:</strong> Proprietary Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
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<td>I object to GBC removing land from the Green Belt, including by insetting villages, as there are no exceptional circumstances to justify this. GBC’s efforts should focus on developing brownfield sites before any consideration is given to removing land from the Green Belt.</td>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<th>Respondent: 11043073 / Ingrid Botha</th>
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<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
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<td>I object in the strongest possible terms to the removal of Send from Green Belt status and to the proposals to build on the Green Belt fields at Gosden Hill, Garlick’s Arch, Send Hill and Clockbarn Nurseries, particularly Sites A25, A35, A42, A44 and A43. NPPF states that the Green Belt should only be altered in “exceptional circumstances.” There simply are no eligible exceptional circumstances expressed in the Local Plan or supporting documents. Guildford’s urban brownfield areas must be identified and utilised instead, not only to protect our countryside but also to limit the impact on road traffic yet provide much-needed access for new housing to transport links such as the rail network.</td>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<th>Comment ID: PSLPP16/10928</th>
<th>Respondent: 11043425 / Melinda McLean</th>
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<td>I particularly object to the removal of any Villages - especially Ripley - from the Green Belt (“insetting)</td>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td>I object to the extended development in the Green Belt (Policy P2, Site A43)</td>
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<td>I object to Garlick’s Arch (A43) being extended and the resulting urban sprawl. There are no exceptional circumstances for this site being removed from the Green Belt, as required by the National Planning Policy.</td>
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<th>Comment ID: PSLPP16/5491</th>
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<td>Re: Responses to Guildford Borough Proposed Submission Local Plan (June 2016)</td>
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<td>I have been a resident in West Clandon for almost 30 years and in the past Guildford Borough Council has listened to the views of the local people. I am appalled that this process is seemingly being overturned with regard to the Local Plan and our opinions not taken into account. How can you ignore the views of many thousands of people who strongly object to these plans?</td>
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<td>This is not YOUR town, it is OUR town! You, no doubt like us, moved to this area because we love the fact we have a wonderful town in the Surrey countryside. We have some of the best landscape in the south of England, protected by Green Belt policies which were put in place decades ago to safeguard this lovely area for not just us, but our children, and our children’s children and for generations to come.</td>
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<td>You have no right to start chipping away at these Green Belt boundaries – boundaries that you have repeatedly enforced in your decisions to prohibit planning applications in the Green Belt. You are guilty of breaching your own policies by simply re-drawing boundaries to suit housing purposes.</td>
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<td>You are the guardians of our town and countryside, you are the elected protectors of this legacy. You should feel ashamed if you, by one swipe of a pen, start taking away our protection that was so passionately put in place for the whole of England to come and enjoy.</td>
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<td>I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.</td>
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<td>I set out below my objections to specific policies and matters within the Plan.</td>
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1. POLICY P2

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of “About Guildford” (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.
This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

| Comment ID: | PSLPP16/5516 | Respondent: 11043553 / Geraldine Banks | Agent: |
| Document: | Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? | () |
| Sound? | () |
| Legally Compliant? | () |

1. SITES - POLICIES A1 TO A57

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development." However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

| Comment ID: | PSLPP16/14302 | Respondent: 11044129 / Christopher Barrass | Agent: |
| Document: | Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? | () |
| Sound? | () |
| Legally Compliant? | () |
I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

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2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as well as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as well as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14591  Respondent: 11044129 / Christopher Barrass  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an ‘acceptable’ percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.
Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages.

In particular I object the proposed changes to the settlement boundaries for East and West Clandon.

Neither the residents nor the Parish Councils have been consulted on this and we do not wish our boundaries to be altered.

I also object to proposed infilling. A visit to Hook Heath in Woking demonstrates how a village is turned into a crowded estate very quickly once infilling is allowed.

We wish to keep the rural nature of our villages and infilling, together with proposed development of Gosden Hill Farm, will simply create merged suburbs of the rapidly extending Guildford Urban Area.

Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.
In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

I remind you of Guildford Borough Council’s submission to Parliament:

“5.1 Guildford Borough Council supports the fundamental principles of the Green Belt, as set out in PPG2: Green Belts (1995). They are:

1. to check the unrestricted sprawl of large built-up areas;
2. to prevent neighbouring towns from merging into one another;
3. to assist in safeguarding the countryside from encroachment;
4. to preserve the setting and special character of historic towns; and
5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.”

The proposed development of the ‘strategic sites’ in this draft Local Plan goes completely against the Council’s own stated policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp171/103  Respondent: 11044257 / Corinne Waring  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Green Belt, Policy 2 at paragraph 4.3.15

I object to the proposal to inset Send Business Park from the Green Belt because there is highly restricted vehicular access along Tanner Lane in both directions, further expansion or development at this location detract from the openness of the Green Belt and will ruin an area of outstanding countryside adjacent to the beautiful Wey Navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2836  Respondent: 11044353 / Michael Frayn  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13760  Respondent: 11044353 / Michael Frayn  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY P2

I wish to register my objections to the proposed development of sites in East and West Horsley on the following grounds:

The proposed development area lies within the Metropolitan green Belt, which the policy P2 undertakes to protect from inappropriate development. There is no justification for the removal of this protection of a rural area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6751  Respondent: 11045601 / Chloe Hartwell  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Green Belt

West Horsley is situated within the Green Belt and on the edge of the Surrey Hills, a Sight of Special Scientific Interest. Taking the village out of the Green Belt, and building such a huge number of houses, both in Horsley and Wisley Airfield, will have an enormous impact on these delicate areas. The increase in the number of people and in particular dog walkers and horse riders, using the SSSI will have an enormous negative impact on such a special environment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17894  Respondent: 11045665 / Graham Bannister  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

65% of the housing proposed in the new plan is on green belt. WE are lucky enough to live in a beautiful part of this country but not for much longer if proposed developments go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/14936  Respondent: 11045697 / Nick Hartwell  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am totally opposed to the village’s removal from the Green Belt by insetting and extending the 2003 Local Plan Settlement Area Boundaries. This seems madness for ecological reasons and also will change the face of the village for ever. The defined Settlement Area boundaries (ref 2003 Local Plan) do not need to be further extended. Over development will destroy the character of the area and deter what recreational visitors we have left (cyclists and walkers). Also the Guildford Borough Economic Strategy 2013-2031, makes no case for locating large numbers of homes in East and West Horsley or indeed the neighbouring villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1452  Respondent: 11045729 / Samantha Wigfall  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I want to vehemently object to the villages being inset from the green belt.

In the Guildford plan section 4.3.12 it states "Historically all the villages, except Ash Green, and major previously developed sites have been washed over by the Green Belt designation. However, the national planning policy states that only those villages whose open character makes an important contribution to the openness of the Green Belt should be included in the Green Belt. Those that do not should be inset, or removed, from the Green Belt and other development management policies used to restrict any inappropriate development". According to the National Planning Policy Framework (NPPF, 2012) there are five stated purposes of including land within the green belt: to check the unrestricted sprawl of large built-up areas, to prevent neighbouring towns from merging into one another, to assist in safeguarding the countryside from encroachment, to preserve the setting and special character of historic towns, and to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

In fact the UK government encourages local authorities to protect the land around the towns by creating green belts, and not to build on them. By insetting the villages you are effectively disregarding the government policy to protect urban sprawl, not safeguarding the countryside, and not preserving the character of the villages in this area. Who has decided that West Horsley and the other villages mentioned in the plan do not make a significant contribution to the openness of the greenbelt?

This is a village and should remain a village at its current size, and not be inset by the plan to accommodate the greed of the property developer, it should remain in the greenbelt as it is a beautiful village to live in and it should remain so. Lets face it, putting a quarter of the homes designated for development in greenbelt villages in one village is too much and should not be allowed to happen. Please listen to our concerns and not allow developers to make significant revenue for themselves at the expense of destroying village life in Surrey.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Respondent: 11045761 / Sean Dowdeswell</th>
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<td><strong>I object to the Proposal to remove the Horsleys from the Green Belt.</strong> The exceptional circumstances required before taking this action have <strong>not</strong> been demonstrated.</td>
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<td><strong>I object to the Extension of the boundaries of the Settlement area of the Horsleys:</strong> no sound reasons have been given for the proposed changes which seem to be aimed solely at increasing the land available within the settlements for future additional development.</td>
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<td><strong>I should like to make the following comments about the local plan and its relevance to Send.</strong></td>
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<td>1. <strong>I object to Send Village being removed from the green belt.</strong> The green belt was intended to be permanent, as required by the national planning policy framework, and there are no special circumstances to justify abandoning it. Send’s green belt provide an essential buffer between Guildford and Woking stopping them becoming a continuous built up area. Local councillors and central government gave a clear election promise to protect the green belt and this reneges it.</td>
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<td><strong>I object to Send Village being removed from the Green Belt.</strong> The Green Belt was intended to be a lasting arrangement under the National Planning Policy Framework. There are no exceptional circumstances that warrant departing from that...</td>
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arrangement. Send's Green Belt provides an essential buffer stopping Woking and Guildford comprising one conurbation. It is a betrayal of the trust that was placed by residents in local councillors and central government who gave clear undertakings to protect the Green Belt. These proposals represent a breach of representations made to, and the mandate given by, residents who elected them. The Green Belt is a safe haven for a diverse range of wildlife. I have observed over the 16 years that I have lived in Send how this wildlife has been eroded. For example, it is clear that plants and animals such as the English oak, the adder, the song thrush and toads are less numerous than when I first came to live in Send. Removing the village of Send from the Green Belt will further limit the ability of these and other wild lifeforms from using the area as a habitat, if not exclude them from the area altogether. Removing Send from the Green Belt will also result in a loss of amenity to residents, many of whom live in the area as young families or retirees, or who otherwise as residents take pleasure from its semi-rural/rural setting and surrounds. This proposal, if successful, will without doubt result in extensive development that will destroy forever (a) the personality and fabric of the village and (b) in turn, the lifestyles and amenity of residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/4866</th>
<th>Respondent: Hazel Corstin</th>
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### 1. POLICY P2

I object to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

I object as Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned.
I object as The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of “About Guildford” (published by the Council) on page 5 states that “... the Plan rejects any schemes that would have a detrimental impact on the Green Belt.” This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages.

In particular I OBJECT to the settlement boundary put round East Clandon with no reference to the residents or the Parish Council.

Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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1. **SITES - POLICIES A1 TO A57**

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. **The plan says that “allocating these sites does not grant planning permission for development.”** However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/2083  **Respondent:** 11047329 / Hazel Corstin  **Agent:**

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I wish to object to a number of issues in the ‘Proposed Submission Local Plan (2017)’ which have changed since the previous ‘Draft Local Plan 2016’. In addition I would like to state that the original objections to the 2016 plan remain. I still believe that this deeply flawed Local Plan will have a direct and detrimental effect on the amenity currently enjoyed by residents of East Clandon and to the even greater detriment to our neighbouring villages of West Clandon, Ripley, Send, West and East Horsley. The plan erodes the openness of the Green Belt and endangers the beauty and views in and out of the Surrey Hills AONB.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14364  **Respondent:** 11047425 / Ian & Karen Pollard  **Agent:**

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The Plan involves moving the current Greenbelt boundaries and the Greenbelt is one of the main reasons why this area maintains its rural charm and character, particularly just outside the M25. If the proposal goes ahead then the Greenbelt land will be lost forever and our inheritors will be denied these benefits and be thrust into an increasing metropolitan mass.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14525  **Respondent:** 11047681 / Robert Stewart  **Agent:**
| Comment ID: | pslp171/2404  | Respondent: | 11047681 / Robert Stewart  | Agent: |
| Document: | Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |

**Development within the green belt**

The stringent national criteria for exceptional circumstances for removing greenbelt classification has not been met.

The area is uniquely placed to act as a barrier from the urban sprawl of London, and adjustments to the greenbelt boundaries will result in an additional housing load. This will erode the current green area between the major towns of Woking, Cobham, Leatherhead, and Guildford. I do not believe the reason for removal of green belt status is justified.

This area of rural Surrey attracts visitors to the region, such as walkers and cyclists from outside the county and its importance extends beyond that of the local residents.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

| Comment ID: | PSLPP16/16206  | Respondent: | 11047809 / Jeremy Frost  | Agent: |
| Document: | Proposed Submission Local Plan: strategy and sites 2017 / Policy P2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |

Whilst I welcome the removal of site A36 and A41, the amendments have not addressed the failings in the local plan on infrastructure (that the level of development is so extensive the area cannot accommodate the additional housing without major investment in infrastructure and other local provisions), development within the green belt and other concerns as stated in my letter dated 17 July 2016, for the following sites:

**Former Wisley Airfield (site A35)**

**Bell & Colvill (site A37)**

**Manor Farm Site (site A38)**

**Ockham Road North (site A39)**

**Ockham Road North (site A40)**

**Garlick’s Arch (site A43)**

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I object to the removal of the Horsleys from the Green belt. In order for an area to be taken out of the Greenbelt, it requires ‘exceptional circumstances’ and I don’t believe that Guildford has set out a solid case for this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16259  Respondent: 11047809 / Jeremy Frost  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Plan taking the Horsleys out of the Greenbelt. The plan fails to demonstrate the ‘exceptional circumstances’ that are required for this action to take place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12946  Respondent: 11047873 / Mary Waldner  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY P2

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and
nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

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In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am shocked to read about the gerrymandering with established boundaries in, what appears to be, an attempt to make the plans work where they are unworkable under existing and long established village boundaries. It is my understanding that any change in Green Belt boundaries should demonstrate exceptional circumstances. I see no exceptional circumstances to justify the proposed arbitrary changes to the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6522  Respondent: 11047969 / Richard Poppe  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

There are obvious and real reasons why the plan to ‘adjust’ the village boundaries and cancel large areas of Green Belt to accommodate a 35% increase in local households does not work. In addition the loss of recreational amenities, both for local people and the considerable number who travel, particularly from London would be disastrous. There appears to be a determination to extend the boundaries of the built up area of London through the Horsleys, past Guildford and beyond. Our Green Belt is precious. It is what protects London from urban sprawl; it preserves air quality; it prevents flooding; it is the city’s playground. It is for us to conserve and protect it. I understand that there are five legal purposes for Green Belt as I am certain you are aware, and the area around East and West Horsley is particularly critical in meeting all of these criterial:

• To check the unrestricted sprawl of large built up areas
• To prevent neighbouring towns merging into one another
• To assist in safeguarding the countryside from encroachment
• To preserve the setting and special character of historic towns
• To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

The concept of limiting urban sprawl, and the requirements for the establishment and maintenance of the Green Belt have apparently been disregarded or completely ignored in the new Guildford Local Plan.

May I urge you urgent to reconsider this objectionable and unworkable plan that will result in the loss of the villages and country in which we live.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2245  Respondent: 11048001 / Robin Dorran  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

I strongly object to policy 4.3.13 which removes a number of villages from the green belt for the following reasons:

Whereas only certain sites have been identified within these villages at this stage of the local plan it will open the floodgates to future high density infilling within the villages which will put pressure on the infrastructure and roads and more importantly destroy historic English villages forever.
There has been little consultation from the council with the public many of whom do not understand the implications of this document.

The Localism Act has been ignored

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/611  Respondent: 11048353 / Lynda Hill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The greenbelt is so unique as a buffer from congestion, pollution and wildlife. To completely disregard the greenbelt is a complete failing by the council.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16257  Respondent: 11048481 / Patrick Oven  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the "insetting", i.e. removal, of the villages of Send, Ripley and the Clandons from the Green Belt. There is no demonstrated need let alone "exceptional circumstances" for such action and the proposed massive development in these areas. The former Secretary of State, Eric Pickles, emphasised last year that Councils did not need to achieve Government building targets at the expense of the Green Belt. Both the outgoing Prime Minister and Chancellor, David Cameron and George Osborne, reiterated this earlier this year. There is no reason to assume that government policy has changed in the light of events over the past week, and indeed "Brexit" may well lead to a reduction of immigration, depending on the terms of withdrawal from the EU that are negotiated in due course. The Green Belt was to remain sacrosanct as a buffer between urban area except for where exceptional circumstances exist. It is abundantly clear from the proposals in this ill-conceived plan that no such circumstances exist as regards the proposed developments on green field sites in the existing Green Belt.

Send in particular, I concede is not a pretty village, at least as far as the central section of it's main street is concerned. Nevertheless the roads off it are predominantly attractive semi-rural and rural lanes, soon running into attractive and largely unspoilt countryside. Send in particular however, has one attribute shared by only one other village, Shalford, in the Guildford Borough Council area: the Wey Navigation runs through it. This provides a beautiful rural corridor through the northern edge of the village, especially from Trigg's Lock south-west of the village to the Tannery Lane Business Park north-east of it. The Green Belt principle has already been breached in this area by the grant of planning permission for the construction of the new Vision Engineering factory adjacent to the Navigation, but it is accepted that exceptional circumstances were shown for the building of the new factory on land owned by the company next to the existing one. That of course is no reason to allow any further development without again demonstrating exceptional circumstances, nor I would argue, to remove this area from the Green Belt. Send, and its neighbours, should remain in the Green Belt to continue the separation of Guildford from Woking and to avoid having what would effectively be one continuous conurbation from the M25 to Woking to the west of the M25, and to Guildford to the south-west. That is what
the Green Belt principle was intended to achieve, and which remains its objective, the intention being that the Green Belt should be permanent unless special circumstances are made out. They clearly are not here.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

GREEN BELT POLICY 2 AT PARAGRAPH 4.3.15 - RE SEND BUSINESS PARK

I OBJECT to the "insetting" i.e. removal, of Send Business Park from the Green Belt. This is a long-established non-conforming user in the Green Belt adjacent to the National Trust owned Wey Navigation. There is no justification for its insetting and indeed the Council makes no attempt to argue that there is any such reason. It therefore follows that no exceptional circumstances exist as required by the National Planning Policy Framework and thus that there is no reason to inset it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the proposed removal of Green Belt Protection for Send - the Green belt status should be left in place as per the National Planning Policy framework to provide permanent protection against over development and the risk of conurbation and transformation of villages into sprawling areas of mass population.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

1. Legality of Insetting of Villages from the Green Belt
2. Current case law in England is that any removal of land from the Green Belt for any reason and by any means is illegal unless there are special circumstances. This is also set down in the various planning frameworks. Insetting from the Green Belt for the purposes of freeing up land for building without special circumstances has been declared illegal in previous court judgements.
3. No special circumstances are set out in the Draft Local Plan. Proposing or following a course of action known to be illegal should be cause for investigation of those involved for misconduct in public office.
4. I specifically object to the removal of Send from the Green Belt because the village and its countryside provides a necessary buffer between Woking and Guildford. With no special circumstances given in the Draft Plan, the insetting of Send from the Green Belt would be illegal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2608  Respondent: 11049185 / Alan Holden  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. The changes to the plan appear go against the “Countryside Vision Strategy” adopted by the Borough Council and published in the Summer 2017 edition of “About Guildford”. The strategy talks of protecting the countryside, not insetting large areas from the Green Belt and building houses, traveller pitches and industrial sites on it. The strategy talks of aligning the countryside management with “national policy” - and national planning policy dictates that the Green Belt should be protected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7547  Respondent: 11049473 / Victor Bates  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from
the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of “About Guildford” (published by the Council) on page 5 states that “… the Plan rejects any schemes that would have a detrimental impact on the Green Belt.” This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

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There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

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1. **Green Belt Protection**

Green Belt status is a vital protection for our environment, our way of life, and our communities. While GBC is seeking to make massive detrimental changes to meet their perceived but wrong housing need, I believe in any case that meeting housing development need is not sufficient grounds to amend the Green Belt. **Therefore, I strongly OBJECT to any changes to the Green Belt being made for housing reasons.** Our villages should retain their Green Belt status to preserve the culture, the environment, and provide a barrier against the continual and pervasive over-population of our beautiful countryside.

I would remind GBC that there needs to be “exceptional reason” for any village to be removed from the Green Belt, and that housing need to make up development plan numbers is NOT one of them. Where there is need to add housing, use brownfield and extend the current larger communities such as Guildford and Woking to meet needs – where the infrastructure can support the growth. Please consider refusing planning for future new supermarkets such as Waitrose in Guildford, which was not needed, and build housing to the maximum capacity instead. It is simply outrageous that the plan entails over 65% of the new housing being planned for current Green Belt areas.

It is counter to national policy to remove the highest level of statutory protection and rely on conservation areas and other changeable planning policies. Therefore, I can only conclude that the proposed changes to the Green Belt are being done simply to remove any objections to the future development. Hence, **there should be NO CHANGE to the Green Belt status of the villages concerned.** The LDP therefore needs to be amended to remove the proposals to remove Green Belt status and remove development plans seeking to build on current Green Belt land.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

| **Comment ID:** PSLPP16/13422 **Respondent:** 11051649 / Andy Lewis **Agent:** |
| **Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 |

| **Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( ) |

**Concluding remarks**

In summary, there are several significant areas of major objection to the LDP that impact on life in the Surrey villages. The LDP appears to have specifically gone against national Green Belt policy that states that meeting housing need is absolutely not a valid reason for re-categorisation of Green Belt. This plan is therefore ill-considered, and needs to be re-worked from the ground-up and taking full account that Green Belt villages cannot be re-designated to get round planning laws. GBC should seek to:

1) get accurate (and hence far lower) housing demand forecast, and provide objective evidence for their forecasts

2) find ways to meet this without sacrificing Green Belt nor existing village character and community, and

3) before deciding to recommend plots for development, actually consider the real implications on rural lanes and other infrastructure when the plots are amalgamated

GBC should be protecting the Green Belt, the villages and the way of life that we have all come to know and love. Let’s use the plan to do that, not destroy it in many areas, as seems to be the likely outcome from the current draft plan. You have the power to protect for the next 20 years at least, or the ability at a stroke to destroy forever the heritage we cherish. As councillors and planners, you have this important responsibility – please do not take it lightly on the basis of flawed assumptions.
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Attached documents:

Comment ID: PSLPP16/12849  Respondent: 11053825 / Claire Owen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads)
considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

1. **POLICY P2**

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London.
cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

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There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

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**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16789</th>
<th>Respondent: 11058913 / Tarn Stroud</th>
<th>Agent:</th>
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<tbody>
<tr>
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<tr>
<td>I am opposed to the changes to the Green Belt boundaries. I am opposed to the removal of villages from the Green Belt.</td>
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<tr>
<td>The Local Plan proposes taking a number of villages out of the Green Belt to avoid the restriction on development in the Green Belt. The Government has strongly urged Planning Authorities to follow the National Planning Policy Framework detailed advice when considering whether to permit additional development in the Green Belt. The National Planning Policy Framework (NPPF) requires any change of Green Belt boundaries to demonstrate exceptional circumstances. No case for exceptional circumstances has been made in the plan. The Government has made it clear that unmet housing need is not an exceptional circumstance in law.</td>
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<td>The National Planning Policy Framework (NPPF) states the purposes of the green belt are to check the unrestricted sprawl of large built-up areas, prevent neighbouring towns from merging into one another, assist in safeguarding the countryside from encroachment, preserve the setting and special character of historic towns and to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. This Local Plan goes against the stated purposes of the green belt.</td>
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The Local Plan allows for several large developments along the route of the A3, from Guildford to the outskirts of London, creating a corridor of development between the two – and so does not prevent the unrestricted sprawl of the London urban area into the countryside.

The Local Plan aims to remove a number of villages from the green belt, thus removing restrictions on development within and around the villages – however, the stated purpose of the green belt is prevent urban sprawl by keeping land permanently open, and consequently the most important attribute of green belts is their openness. Also, the location of the land designated as green belt is fundamental to its purpose – designating alternative land that is located in a more developed area further away from London that is of less interest to developers is not protecting the green belt at all.

The Local Plan permits a disproportionately large amount of development in areas that are currently Green Belt, whilst a relatively small amount of development is planned for the existing urban land. The proportion of new housing within Guildford is far too small, with the development planned for the countryside, ruining the latter and harming urban regeneration. This goes against the aim that urban regeneration is encouraged.

Our ancestors had the foresight to create the Metropolitan Green Belt to restrict the outward growth of London. We must protect this for our descendents.

I OBJECT ESPECIALLY TO 6 POLICIES: A36, A37, A38, A39, A40 & A41:

I am opposed to the changes to the settlement boundaries for East and West Horsley. I am opposed to the removal of East and West Horsley from the Green Belt.

The proposed changes to the settlement boundaries for East Horsley and the northern part of West Horsley may result in considerable development within the new boundary in addition to the development proposed in the plan. There is no assessment of the level of additional, as yet unplanned, development that this change may have.

The plan indicates that it is assumed that some of the development in East and West Horsley will be within walking distance of the primary school and the railway station. However, the pedestrian pavements within East and West Horsley are frequently on only one side of the road and often narrow due to encroachment of trees and hedges. The roads often flood or have large puddles making walking along pavements hazardous after heavy rain. The roads and pedestrian pavements are also often poorly lit or not lit at all. This infrastructure would have to be dramatically improved to avoid significant increase in car traffic - but to do this would completely change the character of the villages to be more like an urban area.

The public transport facilities in East and West Horsley consist of a good train service but an infrequent bus service that does not run in line with typical working hours. It is likely that most of the additional transport resulting from the development in East and West Horsley will result in additional car journeys - either directly to the destination or to and from the railway station. The assumption of pedestrian access to the facilities is incorrect.

The proposed amount of new housing far exceeds the local need. The proposed developments would bring a disproportionally large number of new residents to West Horsley, in particular, for whom there a few opportunities for local employment. The employment prospects for these new residents would mostly be outside of the Horsleys. Hence the new developments would not be providing for local needs, but would allow for people to move out of London and still commute into London for their employment. This is not a sustainable development and goes against the purposes of the green belt.

The infrastructure of East and West Horsley cannot support such a great increase in the number of houses. The local plan classifies Station Parade in East Horsley as a District Centre, designating it an area appropriate for large development due to the availability of local facilities. There is no assessment of the facilities themselves and whether they could support the proposed development sustainably. The 'supermarket' in East Horsley is not sufficiently large to be subject to Sunday trading restrictions, and as such would not fall into a modern description of a supermarket. The small parades of shops in East and West Horsley can only be described as local shops. However, once again, to develop these areas to provide the additional facilities to support a far greater population would completely change the character of the villages, a result which goes completely against the purpose of the Green Belt.
The proposed housing density is excessive when compared with existing housing density within the Horsleys and would transform the Horsleys into a sizable town, something for which no case is made and for which there is no local support. The collective impact of these 6 sites on a small part of the borough is not considered by the Local Plan and they should not be treated as isolated, separate sites. The total amount of new building in the northern part of West Horsley and the adjoining part of East Horsley is out of scale with the planned development elsewhere the borough, including the less sensitive urban areas that are not protected by the Green Belt.

The Horsleys are characterised by streets with development along only one side of the road and an attribute of openness. The policies allow too many adjacent green fields to be developed. This goes against the stated purpose of the Green Belt to retain attractive landscapes and the enhancement of landscapes, near to where people live.

The development sites are mostly currently used for agricultural purposes. To use agricultural land for development purposes cannot be considered ‘sustainable’. Also, the key infrastructure is lacking, with poor wastewater capacity and flooding.

The development of the Horsleys would contribute to a significant narrowing of the Green Belt gap with neighbouring settlements hugely narrowed, especially if the neighbouring large developments also occur at Wisley Airfield, Burnt Common and Gosden Hill Farm.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I strongly object to not protecting the Green Belt (Policy P2).

I am appalled that such a large amount of greenbelt is being used by the GBC plan. I strongly object to removing Ripley, Send and Clandon from the Green Belt, together with Wisley Airfield (A35) and especially Garlick’s Arch (A43) and am appalled at the resulting urban sprawl that would result from this development plan. Why put houses and light industrial close to the A3 at Garlicks Arch? The quality of housing will not be great because of proximity to the A3 (noise and pollution) and there are overhead pylons across the proposed development. There are no exceptional circumstances for these villages and sites being removed from greenbelt status, as required by the National Planning Policy.

I believe the Plan should develop the existing brownfield site at Burnt Common rather than developing Garlick’s Arch (A43), if indeed it believes that we now need this.

Furthermore what about using the Slyfield site – there was a leaflet proposing that site instead recently?

Additionally – climate change – it is predicted – could remove 30% or so of our farming land. Why waste valuable productive farmland when it may become even scarcer in the future? Is the official GBC view that climate change is not happening?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

There is no exceptional circumstance that has been demonstrated to require Horsley to be removed from the green belt. Extension of the boundary area of Horsley is being attempted with no sound reason for this action.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

3. POLICY P2

I OBJECT to not protecting the Green Belt (Policy P2).

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.
This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions. Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I do not believe this to be true.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16754  Respondent: 11070113 / Alison Hague  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

12. SITES - POLICIES A1 TO A57

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraint The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013.

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Attached documents:

Comment ID: pslp171/2501  Respondent: 11070113 / Alison Hague  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy P2 Introduction – My Objections

83) The removal of Green Belt protection from the prison site means that it is likely to come forward for housing development. The nearest feasible access to the A3 is at the A247 junction.

84) My objections to increased traffic on the A247 through West Clandon are outlined more fully elsewhere but include: (i) although notionally an A-road the A247 is narrow and winding in parts and is most unsuited to carrying additional traffic, (ii) the A247 has a single non-continuous footpath in several sections, (iii) a care home, a church car park and a pub, as well as very many houses, are located on the opposite side of the road to the only footpath, making pedestrian access difficult for people moving about the village on foot, especially for elderly and disabled people; (iv) the railway
station and other commercial and residential properties have poor sight lines for access onto the A247 and difficulties in accessing the A247 from these properties will be exacerbated by increased traffic volume (and fewer “gaps” between cars); (v) the A247 is popular with cyclists and because of its narrow and winding nature the potential for accidents that additional traffic will cause is clear.

Policy P2 – My Objections

The Plan states: “4.3.16 National planning policy requires that Green Belt boundaries are only amended in exceptional circumstances and that this must be undertaken as part of the Local Plan process. We consider that exceptional circumstances exist to justify the amendment of Green Belt boundaries in order to facilitate the development that is needed and promote sustainable patterns of development.”

The Plan fails to demonstrate that exceptional circumstances exist for each site that is to be taken from the Green Belt. The wording implies that it is legitimate to have a blanket change to Green Belt boundaries to facilitate development. That is not in accord with the NPPF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8827  Respondent: 11071553 / Nicholas Roberts  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY P2 (GREEN BELT) – I object very strongly. This policy should start by stating the council’s support for the Green Belt, in line with the NPPF, statements by Ministers and its own election manifesto commitments. It should then make a fair and balanced assessment of the Green Belt’s positive importance to Guildford as an asset providing amenities and services to the public and to private individuals alike. This would allow planners in future to evaluate the cost of development proposals in terms of the damage to natural heritage, views and landmarks, farm production, leisure and tourism, biodiversity, flood control, water catchment, carbon sink capacity, public health and wellbeing, public open spaces (eg parks, SANG, burial grounds, recycling areas), mineral extraction, other rural businesses etc, etc…

The amount of new building planned to be located in the Green Belt is beyond all reason. It’s out of proportion with the relatively minor amount destined for the urban areas, where most people would prefer to live. It discriminates against the less well-off by dumping them in remote ghettos in the countryside where there are no jobs, no transport and no social infrastructure. It discriminates against rural residents who’ll have their environment ruined. Actually, it even discriminates against town dwellers who will never see Guildford regenerated.

2000 residents made all this clear in the last consultation and the Conservatives promised to protect the Green Belt, but this plan is a major assault on it, just like the last version, piloted by the infamous Monika Juneja. Nothing has changed.

Why can’t the urban and rural settlements simply adopt new development in proportion to their size? That would mean Guildford town accommodating 20 times the number of new homes compared with the next biggest settlement, East Horsley. People would accept that.

I find it offensive for councillors to say that there is a percentage of Green Belt that should be “sacrificed” to development when this isn’t necessary. It doesn’t matter what the percentage is – this approach isn’t supported by any government policy. We’re being told we can’t stand in the way of progress. That’s what they said about asbestos – and Communism.

Who says Guildford’s rural villages don’t contribute to the “openness” of the countryside and should be “inset” (ie kicked out)? Only the consultants that some unauthorised civil servant hired to draw up the defective Green Belt and Countryside Study, which has never even been vetted by councillors. It’s all too subjective as a basis on which to wreck the lives of thousands of rural residents.
This policy doesn’t refer at all to the requirements in NPPF para.17 and the effects that major development in the Green Belt would have in this regard.

Any impartial observer can see that removing most of the villages from the Green Belt is a very dubious move, especially given the lower economic and population growth following Brexit.

Village settlement boundaries would be extended in a major way, allowing great blocks of house building on green fields and changing forever the rural character of our villages. There is no argumentation or case made in the plan for doing this, and it is unjustified.

As a young resident (23) I don’t want my heritage sold off by people who won’t live long enough to see the consequences. The Green Belt has survived several generations already and should continue to be protected down the ages. The council has misjudged young voters like me if it thinks a vain attempt to manipulate short-term house prices is going to win our support.

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<th>Respondent: 11074561 / Tim Anderson</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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1. POLICY P2

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.
I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID:</th>
<th>PSLPP16/6507</th>
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<td>Respondent:</td>
<td>11074561 / Tim Anderson</td>
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<td>Agent:</td>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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1. SITES - POLICIES A1 TO A57
I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<th>Comment ID: pslp171/1735</th>
<th>Respondent: 11077025 / David Williamson</th>
<th>Agent:</th>
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I object to the proposal to inset Send Business Park from the Green Belt for the following reasons:

- It is an old site that should not be further developed because of its location within Green Belt land on the Wey Navigation
- The road network is narrow and restricted, and totally unable to service any new expansion
- Road links to the A3 and elsewhere go directly through the village, which would increase traffic pollution and danger to local residents and children

To summarise, all these developments in Green Belt land have attracted many thousands of objections from local residents - they are not wanted, but more importantly, they are simply not needed. There are many brown field sites throughout the borough that have not been taken advantage of, only because they would not yield as good a profit for developers.

Housing is needed, but it must be built in the right places, not just the most convenient or most profitable, and be accompanied with investment in local services for the huge increase in numbers of people that would come along with the proposed construction. The real tragedy is that were these developments in Send, Send Marsh and Burnt Common allowed to go ahead, the quality of life for existing and new residents alike would be much poorer than it is now. Local roads, schools and medical facilities are already fully stretched. There would be a considerable human cost for hitting government targets.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/13150</th>
<th>Respondent: 11077473 / Helen Austin</th>
<th>Agent:</th>
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Green Belt.
The proposed plan does not protect the Green Belt and 65% of the proposed new developments will be placed on land that is currently Green Belt. According to the National Planning Policy Framework para 87, it is stated that ‘As with previous Green belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances’. The housing need has already been turned down as an exceptional circumstance.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
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<th>Comment ID: PSLPP16/13497</th>
<th>Respondent: 11078337 / Giselle Hampton</th>
<th>Agent:</th>
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The plan refers to various villages being currently washed over by the green belt and goes on to say that "the national planning policy states that only those villages whose open character makes an important contribution to the openness of the Green Belt should be included in the Green Belt” (4.3.12) With no further justification or discussion the Plan then states that 14 villages are summarily inset from the Green Belt (4.3.13). This is wrong, arbitrary and seemingly in conflict with what has been expressed in previous drafts of the Local Plan which stated

"....The Government attaches great importance to the Green Belts and there is a general presumption against new development in the Green Belt."

"...National Planning Policy requires that Green Belt boundaries are only amended in exceptional circumstances and that this must be undertaken through the Local Plan process"

We consider that the Plan has completely failed to make the case that such exceptional circumstances exist and that as such no amendments to the boundaries should be made around the village settlement boundaries or specifically in relation to the proposed massively inappropriate free standing settlement at the former Wisley airfield which also requires land to be taken out of the Green Belt. We consider in particular that the open character of the East and West Horsley and Effingham villages does make an important contribution to the openness of the Green Belt. Specifically we think that the openness of the Green Belt along the A246/A3 corridor is of critical importance, and has the added benefit of buffering the Surrey Hills AONB. We also consider that the current openness of the Green Belt to the west of the Leatherhead/ Fetcham/Bookham extended settlement and south of Cobham plays a key role in preserving the character of the Green Belt. As such we think the preservation of the Green Belt status of the historic villages running from West and East Clandon to West and East Horsley and on to Effingham and Ockham is massively desirable and entirely in keeping with national guidelines.

Similarly to create a massive new settlement south of the 43 at Wisley, further compromises the openness of the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: pslp171/1422</th>
<th>Respondent: 11078817 / Rachel Miller Johnson</th>
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I object to the Removal from the Green Belt of homes in Guildford Road, northern end of Glaziers Lane, Flexford, Walden Cottage and Palm house Nurseries traveller site.

The GBC has not provided exceptional circumstances for changes to the Green belt.

I object to the changes to Policy P2 because the council has not addressed many of the 32000 comments made about the 2016 plan.

Policy P2 fails to appreciate the importance and permanence of the Green belt and that it needs to be permanently protected. The intension of the Green belt is to check unrestricted urban sprawl.

I object to the statement in the submission Local Plan under Green belt Policy P2 (4.3.13) which claims that Normandy, Flexford and a further lists of 12 villages are “now inset from the Green belt.” This is untrue as GBC is proposing to “inset” these villages. No decision has been made by an Inspector, therefore these villages remain in the Green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/14315</th>
<th>Respondent: 11080097 / David &amp; Julia Hunt</th>
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I object to Policy P2 green belt This policy states, “the general extent of the Green Belt has been retained.” This is a misleading statement. The policy wording is weak in support of the Metropolitan Green Belt even though the latter forms 89% of the borough and should be the cornerstone of all local planning policy. It is precious beyond the short-term demands of the present Government’s policy or a 15-year local plan. As noted under Policy S1 above, it is a solemn legacy to future generations – an asset and amenity that belongs as much to Londoners and the whole nation as to the people who live in it. Once gone it is gone forever. It is not the Council’s to give away. Policy P2 completely fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it has been around for a long time and it needs to be permanently protected. It was actually established in a local act of parliament in Guildford under the London Home Counties (Green Belt) Act 1938 and subsequently in the 1944 Greater London Plan to contain the outward sprawl of London. The boundaries of the Green Belt through Guildford Borough were later defined in the 1987 Local Plan, forming part of a 19-24km concentric belt around London. The Green Belt is intended to check the unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and other urban land. The principles of the Green Belt designation were outlined within Planning Policy Guidance 2: Green Belts (PPG2) and are found within the National Planning Policy Framework (NPPF). The Metropolitan Green Belt is an exemplar of good planning and the envy of planners throughout the world. Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. Building on it involves high opportunity costs, including an irreversible loss of:

1. Agricultural production
2. Rural leisure and tourism amenities
3. Water catchment
4. Flood control
5. Biodiversity
6. Natural heritage
7. A carbon sink for air pollution
8. Room for public facilities such as parks and burial grounds
9. Profitable film locations (e.g. Shere)
10. Future economic potential such as mineral extraction (even fracking)
11. Natural beauty, landmarks, open space, rural views and sight lines
12. Benefits to public health and wellbeing, physical and psychological (as well expressed in the NPPF)

As a matter of law and national and local policy, these assets should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultations. It is quite incorrect to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold. I object to the “insetting” of 14 villages from the Green Belt. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost hell bent on self-defeat. I believe this policy is based on a flawed Green Belt and Countryside Study that, according to one Conservative Councillor, was irregularly commissioned by Council officers without the authority of Councillors. To “inset” two thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, although they would quickly destroy them if the proposed “insetting” and boundary extensions go ahead.

I object to the removal of over 400 hectares of Green Belt land in and around Blackwell Farm to facilitate further development of Surrey Research Park and for 1800 homes. Over 60 hectares were removed from Green Belt 12 years ago for the same developer (Surrey University) who has yet to fulfill their planning obligations. This valuable land has been squandered with over 17 acres of surface car parking and as one of the key features of Green belt is its 'permanence' this second request for yet more Green Belt land to be released in such a short space of time, with all the outstanding issues that remain makes this all the more objectionable.

Furthermore I object on grounds of the impact this development will have in terms of congestion on our highways, these issues have been highlighted under 'infrastructure'.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Council to act in accordance with the views of the majority of Borough residents, rather than to continue with proposals that benefit a minority with a vested interest in the proposed major new housing developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2913  Respondent: 11086433 / Colin Carmichael  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I have lived in West and East Horsley since 1984 and object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15058  Respondent: 11095905 / Joanna Holden  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. Legality of Insetting of Villages from the Green Belt
2. Current case law in England is that any removal of land from the Green Belt for any reason and by any means is illegal unless there are special circumstances set down in the various planning frameworks. Insetting from the Green Belt for the purposes of freeing up land for building without special circumstances has been declared illegal in previous court judgements.
3. No special circumstances are set out in the Draft Local Plan for or following a course of action known to be illegal which should cause for investigation of those involved for misconduct in public office.
4. I specifically object to the removal of Send from the Green Belt because the village and its countryside provides a necessary buffer between Woking and With no special circumstances given in the Draft Plan, the insetting of Send from the Green Belt would be illegal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9679  Respondent: 11096161 / Janice Perry  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. Legality of Insetting of Villages from the Green Belt
2. Current case law in England is that any removal of land from the Green Belt for any reason and by any means is illegal unless there are special circumstances set down in the various planning frameworks. Insetting from the Green Belt for the purposes of freeing up land for building without special circumstances has been declared illegal in previous court judgements.
3. No special circumstances are set out in the Draft Local Plan for or following a course of action known to be illegal which should cause for investigation of those involved for misconduct in public office.
4. I specifically object to the removal of Send from the Green Belt because the village and its countryside provides a necessary buffer between Woking and With no special circumstances given in the Draft Plan, the insetting of Send from the Green Belt would be illegal.
I object to not protecting the Green Belt (Policy P2)

It would be a tragedy to remove Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) as this would result in an urban sprawl that would utterly destroy the character of the area. Successive governments have continually supported the retention of the UK's Green Belt that is particularly necessary in the outer reaches of London. The alternative would lead to London sprawl extending to beyond Godalming. This must be avoided at all costs. There are more than enough brownfield sites in the Guildford area that should be developed for the Plan.

There are no exceptional circumstances for these villages and sites being removed from the Green Belt, as required by the National Planning Policy (Policy P2).

Central Government state clearly that housing need is not an exceptional circumstance.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/6402  Respondent: 11098241 / Sammy Chalk  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to all insetting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15857  Respondent: 11098369 / Neil & Nicki Covington  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

WE OBJECT to not protecting the Green Belt (Policy P2)

WE OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13597  Respondent: 11099169 / Ben Fraser  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Loss of Greenbelt Land:

It is of paramount importance that we continue to protect our green belt and open spaces, especially when there are brown field sites available in the UK for development.

This is to say nothing of a raft of other concerns ranging from policing to pollution and potentially increasing the flooding risk. I urge you to rethink the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt, and its inclusion in the Local Plan as a site suitable for development. This site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt. The proposed removal of this site from the Green Belt by GBC only a few months after Wisley Property Investments Ltd.’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers is totally hypocritical, lacking in logic and integrity, and would seem to indicate the existence of an unduly coercive influence by the associated developers on some council members.

From what I have seen of the Local Plan Guildford’s planners, councillors and external consultants seems to have forgotten (or not be aware of) what gives the Borough and Surrey as a whole its unique character and the attributes which currently make it one of the most desirable places in the country to live in.

The first of these is of course that a good proportion of the Borough and indeed the county is countryside protected by the Green Belt, a piece of planning legislation which has given London its “Lungs” and prevented an unrestricted urban sprawl envied by most of the world’s capital cities.

The second is that quintessential element of the British countryside, small villages dotted about the county each with its own character, vernacular architecture, church and village green and individual communities.

The third attribute is the space that we enjoy by choosing to live in a rural and not an urban environment.

The proposals shown in the Local Plan spell out the destruction of what causes this part of Surrey to be unique and will devalue the quality of life of many of the Borough’s residents particularly in the Horsleys, Ockham, Ripley and Send.

5) For these reasons I also object to the proposed extension of the Settlement Boundaries of the Horsleys.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to Policy P2 green belt. This policy states, “the general extent of the Green Belt has been retained.” This is completely false. The policy wording is weak in support of the Metropolitan Green Belt even though the latter forms 89% of the borough and should be the cornerstone of all local planning policy. Policy P2 completely fails to appreciate the importance and permanence of the Metropolitan Green Belt and it needs to be permanently protected. The boundaries of the Green Belt through Guildford Borough were defined in the 1987 Local Plan, forming part of a 19-24km concentric belt around London. The Green Belt is intended to check the unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and other urban land. The principles of the Green Belt designation were outlined within Planning Policy Guidance 2: Green Belts (PPG2) and are found within the National Planning Policy Framework (NPPF). Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. As a matter of law and national and local policy, these assets should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected
This is in breach of party manifesto commitments and contrary to previous responses to public consultations. It is quite incorrect to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold. I object to the “insetting” of 14 villages from the Green Belt, and at “infilling” 12 of the borough’s Green Belt villages. I am disturbed that settlement boundaries are to be hugely extended in many villages and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages reflect the effect of ribbon development (often along just one side of existing roads) permitted between the Wars. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development. I believe this policy is based on a flawed Green Belt and Countryside Study. To “inset” two thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, although they would quickly destroy them if the proposed “insetting” and boundary extensions go ahead. This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions. Send is a good example of villages that should not be removed from the Green Belt. Send provides an important Green Belt buffer between Woking and Guildford. The village and the countryside behind the A247 should all be protected.

I object to three particularly vulnerable areas of high quality amenity land being taken out of the Green Belt around Send which include:

- The land behind the schools including playing fields and woodland.
- The land to the right of Cartbridge by the River Wey Navigation up to the new boundary fence with Vision Engineering.
- Land to the left of Cartbridge going up to the old depot on the Wey Navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/524  Respondent: 11100193 / Michael Turner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy 2 paragraph 4.3.15 green belt.

I object to the proposal to inset Send Business Park from the green belt. The business park fronts the River Wey navigation which is acknowledged as protected corridor. The business park is a historical accident arising from a former historic industrial use. Tannery Lane is too restricted for any increase in traffic and the business park should remain within the green belt to inhibit further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12503  Respondent: 11101345 / Katja Schilling-Bayley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I categorically OBJECT to this policy.

As a start, the Green Belt does not belong to Guildford Borough Council and therefore is not theirs to carve up and dispose of as they choose. The Green Belt totals 89% of the borough and as such must be vigorously protected for existing and, above all, future generations.

Careful and considered development of certain Green Belt areas could be considered – but these must be proportionate to the size of existing developed areas. For example, how can anyone justify that urban Guildford receive less development than semi-rural Horsley? Guildford is in desperate need of regeneration! How can this be overlooked in favour of sacrificing untouched countryside? The revival and repopulation of central London is a clear example that building satellite settlements is an out-of-date approach to planning.

Furthermore, the “insetting” of 14 villages and “infilling” 12 villages from the Green Belt is a completely flawed plan when considering these villages’ proximity to metropolitan London. How can someone argue that these villages fail to contribute to the purposes of the Green Belt? Yet again this is a totally flawed manipulation of incorrect information.

I fervently hope that this time residents’ considerations will be taken into account more and will result in a less “fluffy” version of a Local Plan – one that will be based upon concrete evidence rather than hypothetical approximations and one that will preserve the existence of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2020  Respondent: 11101345 / Katja Schilling-Bayley  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the changes to Policy P2

- Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital.
- It is quite incorrect to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold. No-one argues that we should sell 1.6% of the Crown jewels in order to build houses.
- I object to the changed “insetting” of 15 villages (including Ripley) from the Green Belt, and at “infilling” 12 of the borough’s Green Belt villages.
- I am deeply upset that settlement boundaries are to be hugely extended in many villages (particularly at Send) and that infilling is also proposed outside the settlement boundaries of 11 further villages. This is completely unplanned and unmeasured development outside of the OAN.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLLPP16/15533  Respondent: 11104033 / David Dutton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to not protecting the Green Belt (Policy P2).

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6549  Respondent: 11107105 / Michelle Manester  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

As a resident of Send Hill having lived here for 13 years, I feel the need to write to you about the proposed development currently being considered in Send.

First and foremost I was shocked, and object to Send Village being removed from the Green Belt, I was under the impression that this was always intended to be permanent and do not see any justification in removing it. Send is of significant importance as it acts as a conduit between Woking and Guildford. I feel totally let down upon hearing this as local councilors and the government had promised to protect our Green Belt, and this will clearly open the floodgate for developers to build in the area to saturation point if it goes ahead putting pressure on infrastructure, services, loss of nature etc

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6818  Respondent: 11114721 / Elizabeth Wilcockson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to building on the Green Belt because the essential characteristic of Green Belt is its openness and permanence (National Planning Policy Framework paragraph 79);

I object to the changes to Green Belt boundaries. This is not justified by any very special circumstances. All the Green Belt sites meet the five purposes of the Green Belt;

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6821  Respondent: 11114721 / Elizabeth Wilcockson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to all other strategic sites in the Local Plan, Blackwell Farm, 3 Farms Meadows, Garlick’s Arch, West Horsley and Hog’s Back. All are out of proportion to the surrounding area and none qualify for the exceptional circumstances required to take them out of the Green Belt;

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6832  Respondent: 11114721 / Elizabeth Wilcockson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

3. I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5695  Respondent: 11115201 / Philip Colinese  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Green Belt: The Plan, if implemented, would mean a serious loss of Green Belt land in the vicinity. It does not provide adequate evidence that exceptional circumstances exist to justify taking over Green Belt land for strategic development. More consideration needs to be given to development on brownfield sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17320  Respondent: 11116001 / Audrey Bennett-Davies  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Over 65% of the proposed housing is planned for land currently in the Green Belt. The Government has stated that housing need is not a reason for protected Green Belt Land being used to provide it.

In conclusion, I object to the Local Plan as it seeks to remove the Green Belt from our villages and places a far greater housing burden on West Horsley proportionate to the current number of houses, than anywhere else in the borough. It provides for no additional infrastructure or facilities and is largely a developers’ charter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14037  Respondent: 11136993 / Elliot Machin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The following points listed are my objections to Ripley, Send and Send Marsh villages being removed from the Green Belt & the development of the following areas:

Clockbarn Nursery
Garlick's Arch
Send Hill
A3 at Burnt Common

The Green Belt was intended for permanent intentions, by the National Policy Framework.

The above mentioned villages were intended as buffers between the towns of Guildford and Woking.

The clear election promise of protecting our Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17411  Respondent: 11149217 / Royal Horticultural Society (RHS)  Agent: Montagu Evans LLP (Montagu Evans)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Both RHS Wisley and Wisley village are located within the Metropolitan Green Belt.

The RHS has been located at Wisley for over 100 years, and Wisley is the RHS’s flagship garden. It is therefore not just a garden but is the headquarters of the RHS. Consequently it contains built development to provide offices, a centre for research, education, an extensive horticultural library, restaurants and cafes, retail, tourism and leisure, and maintenance. All of these are ancillary to the main Garden and are necessary for the RHS to function and thrive. Consequently, these facilities need to have the ability to adapt and evolve in accordance with the primary use and function of the Garden.
Green Belt policy is not an effective way to control development at Wisley. The Garden requires the flexibility to adapt and we therefore propose that part of the Garden is excluded from the Green Belt in previously developed areas where the principle of development is either established or to be established by future planned development.

Policy P2 states:

“We will continue to protect the Metropolitan Green Belt, as shown on the proposals map, against inappropriate development. In accordance with national planning policy, the construction of new development will be considered inappropriate and will not be permitted unless very special circumstances can be demonstrated.

Certain forms of development are not considered to be inappropriate. Proposals will be permitted where they are consistent with the exceptions listed in national planning policy and, where relevant, also meet the following criteria:

Extensions or alterations
The extension or alteration of a building provided that it would not result in disproportionate additions over and above the size of the original building.

Replacement buildings
The replacement of a building, provided the new building:

- would be in the same use, and
- is not materially larger than the one it replaces, and
- is sited on or close to the position of the existing building.

Limited infilling
Limited infilling within the identified settlement boundaries of the following villages: Albury, Compton, East Clandon, East Horsley (south), Gomshall, Holmbury St Mary, Peaslake, Pirbright, Puttenham, Shere, West Clandon and Worplesdon.

Limited infilling may also be appropriate outside the inset or identified settlement boundaries, and in the following villages, where it can be demonstrated that the site is as a matter of fact on the ground within the village: Artington, Eashing, Farley Green, Fox Corner, Hurtmore, Ockham, Seale, Shackleford, The Sands, Wanborough and Wisley.”

It is considered that the wording of this policy is not clear and therefore the following alterations to the wording is suggested:

“We will continue to protect the Metropolitan Green Belt, as shown on the proposals map, against inappropriate development. In accordance with national planning policy, the construction of new development will be considered inappropriate and will not be permitted unless very special circumstances can be demonstrated.

Certain forms of development are not considered to be inappropriate. Proposals will be permitted where they are consistent with the exceptions listed in national planning policy and, where relevant, also meet the following criteria:

Extensions or alterations
The extension or alteration of a building provided that it would not result in disproportionate additions over and above the size of the original building.

Replacement buildings
The replacement of a building, provided the new building:

- would be in the same use, and
- is not materially larger than the one it replaces, and
- is sited on or close to the position of the existing building.
Limited infilling
Limited infilling within the identified settlement boundaries of the following villages:
Albury, Compton, East Clandon, East Horsley (south), Gomshall, Holmbury St Mary, Peaslake, Pirbright, Puttenham,
Shere, West Clandon, and Worplesdon and Wisley.

Limited infilling may also be appropriate outside the inset or identified settlement boundaries, and in the following
villages, where it can be demonstrated that the site is as a matter of fact on the ground within the village: is contained on
at least 3 sides by built development:
Artington, Eashing, Farley Green, Fox Corner, Hurtmore, Ockham, Seale, Shackleford, The
Sands, and Wanborough and Wisley.”

Previously, a proportion of Wisley Garden was proposed to be allocated as a Major Previously Developed Site within the
Draft Local Plan Strategy and Sites Document.

Since the Draft Local Plan Strategy and Sites Document was published, national planning policy and guidance now refers
to limited infilling as an exception to development in the Green Belt. Paragraph 89 of the National Planning Policy
Framework (NPPF) outlines exceptions to the construction of new buildings as inappropriate in the Green Belt. These
exceptions include the following:

“Limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether
redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness
of the Green Belt and the purpose of including land within it than the existing development.”

The exception of ‘limited infilling’ is incorporated within Policy P2. However, Wisley Garden and Village are not
currently proposed to be an inset in the Green Belt in the Submission Local Plan: Strategy and Sites document. The
principle of the exception therefore only applies to land at Wisley that is previously developed and would not have a
greater impact than existing development. This does not serve the purpose of the Society. When development is planned
at Wisley the need to improve facilities to meet future demand naturally means that development will be larger and
therefore a subjective judgement is applied to determine whether this is a greater impact on the Green Belt or whether
very special circumstances exist. In order to provide greater clarity, we proposed that the Garden and Village are removed
from the Green Belt.

The garden at Wisley is definably a previously developed site, within the Green Belt, which is constantly evolving,
reflecting and supporting the work of the Society. On the basis that RHS Wisley has been formerly considered as a
previously developed site, we would propose that the gardens and village are included as an inset within the Green Belt
within adopted policy. This would allow for limited infilling and the redevelopment of brownfield land within the village
and garden.

Land at Wisley Village could provide a potential future housing site. This would reduce the need for development to be
directed to the Green Belt and could form a more sustainable option as well as creating a critical mass for a more
sustainable community at Wisley.

To support the allocation of land within the village for housing an assessment of the following would need to be
submitted in support to inform such proposals. This assessment would consider the following issues:

• Flooding;
• Access; and
• Ecology

A smaller scale of housing of approximately 15 units through infilling could be delivered in the plan period. This
approach would aid the delivery of the Borough’s housing targets. With that said, we hope the request to include Wisley
Gardens and the Village as an inset within the Green Belt will be supported.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of “About Guildford” (published by the Council) on page 5 states that “... the Plan rejects any schemes that would have a detrimental impact on the Green Belt.” This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.
This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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1. I object to Policy P2 under which areas of land surrounding Send Village would be taken out of the Green Belt. The Green Belt around Send provides a buffer between Guildford and Woking in accordance with Government Policy to limit urban sprawl and the reduction of the Green Belt in this strategic area would be the first step in the development of the very urban sprawl which the Green Belt was devised to prevent.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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1. I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.
The Plan should develop the existing brownfield site at Burnt Common rather than developing Garlick’s Arch (A43).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/7972  **Respondent:** 11151745 / Nigel Thomas  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I write to state that I strongly object to the above proposals. This land contributes to the open character of Shalford Village and provides an attractive setting for the villages community, facilities. Highly significant is that access to this land is via Chinthurst Lane which is an already heavily congested country lane!

As a Shalford resident since 1969 I urge you to withdraw these proposals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/11846  **Respondent:** 11153313 / Milena Nicholas  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The removal of land and villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/18620  **Respondent:** 11154881 / National Rifle Association (A Mercer)  **Agent:** Andy Stallan (WYG)

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Section 4.3: Protecting Policies; Policy P2: Green Belt

The NRA note paragraph 4.3.11 reflects the NPPF in stating that the main aim of Green Belt is to prevent urban sprawl by keeping land permanently open.

Paragraph 4.3.12 states that historically all the villages in the Borough, except Ash Green, and major previously developed sites have been washed over by the Green Belt designation. The text then correctly confirms that the NPPF states that only those villages whose open character makes an important contribution to the openness of the Green Belt should be included within it. Those that do not should be inset, or removed, from it and other development management policies used to restrict any inappropriate development.
Paragraph 4.3.13 provides a list of villages which under LP1 will now be inset from the Green Belt.

Paragraph 4.3.14 follows and clearly states that although not villages, a similar approach is to be applied to major previously developed sites in relation to whether they should remain washed over or be inset from the Green Belt. Again the paragraph correctly reiterates that the NPPF requires that land which it is unnecessary to keep permanently open should not be included in the Green Belt. If major previously developed sites are of sufficient scale and do not possess an open character, it is not considered necessary for them to remain within the Green Belt.

Paragraph 4.3.15 goes on to list the major previously developed sites (MPDS) which will become inset from the Green Belt under LP1. These are: Henley Business Park, HM Prison Send, Keogh Barracks, Mount Browne, Pirbright Barracks, Pirbright Institute and the University of Law Guildford.

The NRA do not object to the insetting of any of these MPDS from the Green Belt. However, the NRA are entirely concerned, and disappointed, by: 1) the omission of Bisley Camp from the list of major previously developed sites within the Borough set out by paragraph 4.3.15; and 2) the according omission of Bisley Camp's developed land area as being inset from the Green Belt and shown to be so on the proposals maps of LP1.

As the Council will recall, in response to the consultation on the DLP in late 2014 the NRA submitted representations on the findings of the Council’s Green Belt and Countryside Study (GBCS) which comprised, and still does, part of the evidence base upon which the new local plan and its policies are being developed. It is not our intention to fully reiterate the content of the representations made in response to the DLP in response to LP1. A copy of the complete submission is however included at Appendix 1 of this submission for ease of reference and we invite the Council to review it again as a comprehensive element of the NRA’s submission to LP1, specifically in regard to the content under the section heading ‘Assessment of the Evidence Base’.

As currently written, whether by intention or otherwise, the NRA are concerned that between the consultation on the DLP the potential, and correct, status of the developed area of Bisley Camp as a MPDS has now been withdrawn by LP1. This is sincerely disappointing given the comparable similarities identified for the Council within the NRA’s representations made in response to the DLP, specifically regarding the developed area of Bisley Camp and Henley Business Park and The University of Law. The NRA consider that the status of these sites as MPDS support the basis for recognising and establishing Bisley Camp as a MPDS within LP1; and equally for Bisley Camp to be removed from the Green Belt also.

Accordingly, the NRA would like to see paragraph 4.3.15 amended to include Bisley Camp as a specified major previously developed site. The NRA also consider that the boundary of Bisley Camp’s MPDS should be drawn on the LP1 proposal maps to the extent shown on the drawing attached as Appendix 2 of this letter.

The NRA also note that beyond the reference to MPDS within paragraph 4.3.15 LP1 does not contain any other policy concerning MPDS. Having spoken with members of the Council’s Policy Team we have been advised that, at this time, it is the intention that a specific policy or set of policies relating to MPDS’s will be brought forward as part of the future Local Plan 2: Development Management Policies (LP2). It is considered this approach is less than ideal for the NRA and Bisley Camp. Firstly, although a MPDS policy could conceivably be delivered via the LP2 given the purpose and intent of MPDS status and its implications it is considered that this matter should be addressed as part of the LP1. MPDS are strategic policy designations and their designation and policy context should be developed and assessed accordingly. Indeed, as currently written in LP1 it would appear that this is what the consequence of paragraph 4.3.15 and the proposals maps are already establishing. The omission of Bisley Camp as an inset MPDS within LP1 is therefore failing to support the future regeneration and potential sustainable growth of the camp as a significant contributor to the leisure and tourism industry within the Borough. This would be contrary to paragraph 28 of the NPPF and likewise to the Council’s own stated spatial vision.

The NRA would also acknowledge the Council’s current LDS sets out the timescale for delivery of LP2 which is due to commence with evidence gathering from September 2017. Final adoption of LP2 will subsequently follow, after intervening consultation stages, in late 2018/early 2019. LP2 is clearly someway from the present and this further increases the importance to the NRA of the appropriate nature to define the status of Bisley Camp as a MPDS (whether within or inset from the Green Belt) as part of LP1.

In summary conclusion, the NRA consider Bisley Camp should be allocated as an inset major previously developed site. Insetting the site would not conflict with the purposes of including land within the Green Belt (as defined by Paragraph 80 of the NPPF) and, on balance, there is no reason why sufficient defensible boundaries (in compliance with Paragraph
85 of the NPPF) should not be identified. In this regard the NRA would welcome further dialogue with Officers of the Policy Team to discuss and provide additional boundary information. Furthermore, as identified in paragraph 20.8 of the GBCS, if major previously developed sites are not considered appropriate for insetting and are to remain washed over within the Green Belt this implies the open character of the site makes an important contribution to openness. This in turn implies there is limited opportunity to redevelop, or expand the site, without detracting from the openness of the Green Belt. It is evident from an objective assessment of the major developed area at Bisley Camp that the land does not make such an important contribution to the openness of the Green Belt nor does it in landscape character terms as identified in the Council’s own Landscape Character Appraisals. It is also evident that Bisley Camp exhibits comparable features with other major previously developed sites in the Borough that are proposed to be inset from the Green Belt and are stated as such within paragraph 4.3.15 of LP1.

**Policy P2: Green Belt**

The NRA generally support the wording of Policy P2.

However, the 4th bullet point of paragraph 89 of the NPPF clearly states the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces is one of the stated exceptions whereby the construction of a new building need not be considered inappropriate. Nowhere within the NPPF is it stated or implied that new buildings must also be sited on or close to the position of the existing building.

The inclusion of this requirement within Policy P2 is therefore entirely unnecessary, unduly restrictive and fails to accord with the corresponding Green Belt policies of the NPPF. The inclusion of this requirement within Policy P2 is also unqualified within the supporting text to justify why such a specific additional policy requirement should be included within the Borough’s development plan.

The NRA would therefore support an amendment to Policy P2 so that it reads:

‘…Proposals will be permitted where they are consistent with the exceptions listed in national planning policy and, where relevant, also meet the following criteria:…

**Replacement buildings**

The replacement of a building, provided the new building:

- Would be in the same use, and
- Is not materially larger than the one it replaces.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

**Attached documents:**
- Appendix 2 GBCS Section 20 Extract (2).pdf (479 KB)
- Appendix 1 BISLEY CAMP MPD (2).pdf (2.2 MB)
- 160713 LP1 Representation on behalf of the NRA DRAFT (002) (2).pdf (287 KB)
I object to the plan on the basis that any new development in this area will generate additional risk of flooding from drainage issues on Chinthurst hill; additional traffic congestion and risk of accidents in on already busy and narrow roads in the area. The infrastructure of the area with poor road capacity already struggles to cope with traffic that attempts to get in to and around Guildford via Shalford and Chilworth.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<thead>
<tr>
<th>Comment ID: PSLPP16/973</th>
<th><strong>Respondent:</strong> 11157185 / G Keelan <strong>Agent:</strong></th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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As a resident of Shalford at [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] I object to the proposed redevelopment of the above since access to this land is via Chinthurst lane which is already heavily congested. The land also contributes to the open character of the village providing an attractive setting for the villagers and its community facilities. The boundaries in question have been there for a long time and therefore there is no valid reason for change bearing in mind the number of residents who have signed a petition objecting to the proposed settlement boundary change last year.

I sincerely hope that the Council will reconsider their proposals in light of the residents' wishes.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/18540</th>
<th><strong>Respondent:</strong> 11157409 / Burpham Neighbourhood Forum (Ros Pollock) <strong>Agent:</strong></th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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I disagree strongly that building should take place on the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: pslp171/818</th>
<th><strong>Respondent:</strong> 11159809 / Hilary Road <strong>Agent:</strong></th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
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</table>

I object that all these proposed developments are on Greenbelt land

Must the people of Send, which comprises some 11% of the Borough, have imposed on them 40%
of the development of the whole Guildford Plan? This would see the village become submerged by overdevelopment, at
even greater risk of flooding, traffic congestion, an industrialised area conjoined to Woking and Guildford by houses for
families for whom no additional provision has been made.

The Government has repeatedly spoken in defence of the Greenbelt. Is Send excluded from this?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/2012</th>
<th>Respondent:</th>
<th>11160001 / Andy Freebody</th>
<th>Agent:</th>
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<tr>
<td>1. I OBJECT to not protecting the Green Belt (Policy P2)</td>
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<td>I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance' and the land to be taken from the Green Belt. Once taken the green belt is lost forever.</td>
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<td>There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt &amp; Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.</td>
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<td>Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<tr>
<th>Comment ID:</th>
<th>pslp171/2681</th>
<th>Respondent:</th>
<th>11166497 / CALA Homes (Southern Home Counties)</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
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<tr>
<td><strong>Use of Previously Developed Land</strong></td>
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<tr>
<td>Section 4 of the Plan under Site Allocations A1 - A58, is split into sections including ‘Previously Developed Land in the Green Belt’.</td>
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<td>The Plan proposes the redevelopment of two sites (A32 Surrey Police Headquarters and A33 The University of Law).</td>
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<td>As highlighted above, the NPPF encourages ‘... the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value;’</td>
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</table>
Land at Treetops Boarding Kennels and Loxhill Nursery, Old Portsmouth Road, Guildford was assessed through the 2014 SHLAA (Site 2118) as being suitable, available and achievable for the delivery of residential development subject to a satisfactory relationship within the Green Belt, and in relation to the AONB, conservation area and listed building. The site’s development potential was considered to be in the order of 12 units on 2ha, at a density of just 6dph. The site was confirmed as both available and achievable. An application for the site’s redevelopment for 39 dwellings 17/P/00801 is currently being considered by the Council. It is considered that this application reaches a balance between making most effective and efficient use of available previously developed land whilst still respecting the site’s environmental constraints. The resulting density remains very low at 20dph.

Again, at paragraph 14 of the NPPF, the definition of sustainable development is confirmed:

‘For plan-making this means that:

- local planning authorities should positively seek opportunities to meet the development needs of their area;
- Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change.’

The effective use of such previously developed land will assist the local planning authority in meeting its objectively assessed housing needs and in so doing respond positively to wider opportunities for growth as required by the NPPF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

i) Site Allocations:
Land at Treetops Boarding Kennels and Loxhill Nursery, Old Portsmouth Road should be added to the list of sites in the Previously Developed Land in the Green Belt category of Site Allocations as follows:
New Site A34 Treetops Boarding Kennels and Loxhill Nursery Shalford Homes (C3)39

ii) Policy P2: Green Belt
Policy P2 should be amended to recognise the potential that previously developed sites within the Green Belt can make to housing delivery. As such an additional section should be added as follows:
‘Use of Previously Developed Land
(7) The redevelopment of previously developed land within the Green Belt is considered to be appropriate provided that it is appropriate to the scale of the locality and has a beneficial impact on the character of the countryside or the local environment in terms of improving the local built fabric.’

Attached documents:

Comment ID: PSLPP16/10149    Respondent: 11170401 / Anna Bowe    Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I want to bring your attention to a settlement boundary change in one part of the village of Shalford.

I live at [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] and behind us is a small triangular field which belongs to [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998]

I've attached a map of the field in question. I've highlighted in different colours the current situation and what I'd like to see changed. Basically:

- I believe the the proposed boundary change in blue is not correct and it's an accidental mistake. There is a lot of drama surrounding the fields behind the village hall. I think the residents of our part of Christmas Hill have got caught up in this unnecessarily.
- The preferred solution would be to leave the boundary unchanged (in red).

- As you can see in the map the field at the back of Findon Lodge has changed over time. The garden now extends back the whole way (in between the lime and white lines). The original field would have covered all this area hence the existing red boundary line.

- Because of the garden changes I have suggested two alternative boundary lines in lime and white.

The main point here is that the small triangular field needs to remain in green belt please!

- Over 700 residents signed a petition objecting to these boundary changes last year.

- We live in an area of outstanding natural beauty. Although this small piece of land currently has no intentions of being anything else we need to protect it. You just have to look across to Chinthurst Hill to see how badly this would be affected if something bad were to happen.

- If the fields behind the village hall were not up for consideration then I'm sure the boundary near us would not be changing either. It's a very small correction.

I'm happy to show you what I mean from my back garden. I'll throw in a cup of tea too. If you'd like to chat then please do call me on [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998.].

I also want to object to the proposed boundary change to the fields behind the village hall. The big danger here is that the current owner wants to build houses on it.

- Over 700 residents signed a petition objecting to these boundary changes last year.

- The elevation of this land and where it sits in the village contributing to the open character of the village should be protected.

- We live in an area of outstanding beauty. If these fields become less protected then it's such a great shame. I know we need new housing but I think Station Road has given well above the quota needed in our area!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: ChristmasHillPlan - BoundaryChange PNG (1.9 MB)
• Aerial maps which are being used to help draw the new settlement boundary don’t take into account the particularly high elevation of this land and its protected status.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID</th>
<th>Respondent</th>
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<tbody>
<tr>
<td>pslp171/1411</td>
<td>11550561 / Karen Lord</td>
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<td>Greenbelt, At Paragraph 4.3.15, Policy.2, Send Business Park now taken out of the Green Belt altogether, I object from this removal from Green Belt because development of this beautiful area is inappropriate as it protects our unique character around the Wey Navigation and the rural part of our community that will be otherwise be absorbed into the surrounding towns/villages. It offers cleaner air, contiguous habitat network for wild plants, and wildlife. All the reason why it was inserted into Green Belt initially. I object because the road access is very bad into and out of Tannery Lane onto the already very busy and congested Send Road.</td>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<td>PSLPP16/2371</td>
<td>11556161 / Barry Lewis</td>
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<td>Can you tell me why GBC have ring-fenced Council owned residential properties from further development? I have identified a number of Council houses with large gardens, not in the Green Belt which are suitable for additional development. The Housing Department however, flatly refuse to discuss such development proposals. surely an untenable situation? The Council do however seem &quot;hell-bent&quot; on development within he Green Belt. The basic principal of no development within the Green Belt should be upheld. Communities however need to grow so I can support limited and sustained development within the Green Belt on specific infill sites. I cannot support whole scale removal of land from the Green Belt.</td>
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<tr>
<td>PSLPP16/17212</td>
<td>11832961 / The National Trust - London and SE (Rachel Botcherby)</td>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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The National Trust recognises the need to build more houses, and we support development in line with locally agreed plans.

Given the Borough’s landscape and green belt designations, which footnote 9 of the NPPF (discussed earlier in this letter) acknowledges are such areas where development should be restricted, in determining the approach to where new development should be distributed due regard should be given to the retention of the Green Belt to ensure that communities remain separated and to prioritise the re-use of brown field over green field sites.

Settlement Boundaries

West Horsley

As stated in our previous representations to the Local Plan we object to the removal of West Horsley (south) from the Green Belt. West Horsley is smaller in scale, and very different in form and character from East Horsley and its rural nature and proximity to Hatchlands Park are such that we believe it should be retained within the Green Belt. A future aspiration should be to extend northward the current boundary of the Surrey Hills AONB to wash over Clandon, Hatchlands, West and East Horsley.

Send

We object to the removal of the village of Send from the Green Belt. The scale, form and open, rural character of the village is such that it makes a significant contribution to the openness of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID:</th>
<th>PSLPP16/11038</th>
<th>Respondent:</th>
<th>11941665 / Debra Hurdle</th>
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<td>is Legally Compliant?</td>
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I object – Having visited a friend whose house and garden overlooked our beautiful countryside, I was shocked and dismayed to hear that the Guildford Local Plan included a site to build houses on the adjacent field! I am therefore concerned that it is possible to find ‘special circumstances’ to justify building on protected Green Belt areas and especially in Send?

I am very concerned about the proposed ‘in-setting’ of Send which will mean that the green areas within our rural village will become much more vulnerable to development as they no longer have Green Belt protection? The green areas within Send characterise the rural aspect of the village and to develop them could spoil it!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID:</th>
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</table>

I believe the plan is unsound for reasons including but not limited to:
-building on Green Belt when there is brownfield sites available.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16716  Respondent: 11992097 / Karen Fryatt  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

building on Green Belt when there is brownfield sites available:

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3244  Respondent: 12124385 / P Davie  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

b. Building on Current Green Belt land: I OBJECT to the proposed development of current Green Belt sites at Clockbarn Nurseries, Garlick’s Arch, and Send Hill since there are no special circumstances which justify removal of their Green Belt status.

c. Process: I OBJECT to the failure of Guildford Borough Council to identify sufficient brownfield sites within existing urban areas that should be targeted for development before the open countryside and the Green Belt.

d. Process: I OBJECT to the failure of Guildford Borough Council to include the Town Centre Masterplan 2015 within the overall Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18642  Respondent: 12136289 / Martin Digby  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Allowing Green Belt development to pay for transport schemes will simply generate yet more traffic from more homes, fuelling congestion.

I oppose unjustified Green Belt development.

It is irresponsible to squander every last resort greenfield site in a single Plan, robbing future generations.

Brownfield opportunities are being ignored – we need homes in the centre (not 40% more shops), much more accommodation on campus for students, and homes for the elderly to free up family houses.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/700  Respondent: 12191873 / Rob Woof  Agent:  

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )  

Under this policy Send will be removed from the Green Belt which means that all areas within the settlement boundary will no longer be afforded Green Belt protection. The GBC suggest that exceptional circumstances exist to justify the amendment of Green Belt boundaries in order to facilitate the development that is needed. I do not agree that these exceptional circumstances have been proved in the case of Send, when many suitable brownfield / non Green Belt sites remain for consideration

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17504  Respondent: 13579713 / Roger Daniels  Agent:  

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

Local Plan Policies S2 and P2, in particular, are not sound.

Policy P2 and the related maps of Green Belt boundaries are also not sound as they are based on a review of Green Belt boundaries that does not comply with paragraphs 84 and 85 of the National Planning Policy Framework. In particular, insufficient weight has been given to the need to promote sustainable patterns of development and to the consistency of the policy with meeting identified requirements for sustainable development.

Opportunities for sustainable development for housing and other uses associated within the edges of the main urban areas and other settlements have been overlooked because of an inappropriate approach to review of the Green Belt, based on the boundaries of largely irrelevant land parcels.

The review of Green Belt at Wood Street Village exemplifies these shortcomings, which are explained in detail in the report that forms part of this submission. There are opportunities for sustainable development in the village on sites that were identified as Potential Development Areas in the Green Belt & Countryside Study.

The proposed inset boundary for Wood Street Village is unduly restrictive. It excludes large parts of the settlement, including its Green, Conservation Area and Potential Development Areas which are proposed to remain in the Green Belt. The inset boundary appears to have been drawn to restrict development to previously developed sites.

The inset boundary for Wood Street Village should be redrawn to take account of the need to promote sustainable patterns of development and to recognise opportunities for meeting the identified requirements for sustainable development in the village, within revised Green Belt boundaries that also reflect physical features that are readily recognisable and likely to be permanent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Background

Lightwood Strategic submitted representations on the Local Plan Issues and Options consultation in November 2013 and on the Local Plan Consultation Draft (Regulation 18) in September 2014. Their representations expressed concerns about the Council’s proposed approaches to:

- the objective assessment of housing needs;
- Green Belt review; and
- Settlement boundaries in the larger villages, particularly at Wood Street Village.

Lightwood Strategic pointed out that there are natural infill sites in Wood Street Village (including the two ‘alternative sites’ shown on Map 1 - see end of document) that can provide SANG and are located only a short distance from the village green, shops and other amenities.

The Council identified these two sites in April 2014 as ‘Potential Development Areas’ in its Green Belt & Countryside Study (Map 2 - see end of document). It also undertook analysis of various characteristics of the settlement in its Green Belt & Countryside Study to determine whether it was appropriate to define an inset boundary rather than leave the whole village as ‘washed over’ by the Green Belt.

The Council has modified its approach to villages in the Green Belt, in response to the National Planning Policy Framework (March 2012). In the 2003 Local Plan villages were generally ‘washed-over’ by the Green Belt. New Local Plan Policy P2 provides for Wood Street Village and 13 other villages (as well as several, large previously developed sites) to be inset from the Green Belt. In these villages, Policy D4 (Development in Urban Areas and Inset Villages) allows for limited development within strict environmental guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Policy P2 and the related maps of Green Belt boundaries are also not sound as they are based on a review of Green Belt boundaries that does not comply with paragraphs 84 and 85 of the National Planning Policy Framework. In particular, insufficient weight has been given to the need to promote sustainable patterns of development and to the consistency of the policy with meeting identified requirements for sustainable development.

Opportunities for sustainable development for housing and other uses associated within the edges of the main urban areas and other settlements have been overlooked because of an inappropriate approach to review of the Green Belt, based on the boundaries of largely irrelevant land parcels.
The review of Green Belt at Wood Street Village exemplifies these shortcomings, which are explained in detail in the report that forms part of this submission. There are opportunities for sustainable development in the village on sites that were identified as Potential Development Areas in the Green Belt & Countryside Study.

The proposed inset boundary for Wood Street Village is unduly restrictive. It excludes large parts of the settlement, including its Green, Conservation Area and Potential Development Areas which are proposed to remain in the Green Belt. The inset boundary appears to have been drawn to restrict development to previously developed sites.

The inset boundary for Wood Street Village should be redrawn to take account of the need to promote sustainable patterns of development and to recognise opportunities for meeting the identified requirements for sustainable development in the village, within revised Green Belt boundaries that also reflect physical features that are readily recognisable and likely to be permanent.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: PSLPP16/148  **Respondent:** 13707041 / Kirsty Lockie  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

In addition to these other concerns, a development of this scale on greenbelt land would be a disaster for Surrey's Natural Beauty taking away some key green belt land that is a key part of the county's charm and appeal. I am concerned with GBC's attitude to Greenbelt land in general within this local plan as many of the housing development areas are in greenbelt land rather than using the many, many brownfield sites available within the county.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: PSLPP16/11149  **Respondent:** 14188833 / Graham Mills  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Green Belt:

The National policy is clear in that it attaches great importance to the nature of the Green Belt.

The Plan does not show evidence of exceptional circumstances to justify why the Green Belt land should be used for strategic development.

Brownfield land needs more consideration, surely the decline in the need for retail space means that houses could be built in the town centre instead of more retail units, student accommodation should be constructed on campus even if higher rise accommodation is used.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
3) The removal of the green belt.

The green belt is a lawful boundary set in place to protect the identities of rural villages and towns. To stop these places merging into one urban area, and for the welfare of the people and wildlife of Britain. This is an historic beautiful country and will be terribly damaged by the removal of its green belts. Below is a statement relating to this..

'Green belt policy in the UK has shown to be highly effective in halting the urban sprawl and improving the quality of life for both rural and urban population. However, the CPRE warns on the so-called developmental threats to green belt policy and emphasizes the importance of protecting the existing green belt areas in their boundaries'.

'The UK government said that it has no intention of changing the boundaries of green belts but the CPRE says that developmental plans and talks about replacing the “lost” green belt areas elsewhere are clearly revealing that the current green belt policy is under threat.

We live in a democratic country. Yet this Government has not listened to the wishes of its people regarding this issue and now we are told that the lawful green belt can simply be removed? This is a legal binding boundary that no developer can question, yet the council can? This should be totally illegal! Our MP for Surrey Sir Paul Beresford stated before his election last year that he wanted the green belt protected. Yet here we are, one year later taking all the villages out of the green belt?!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/7983  Respondent: 15062145 / Philippa Hackett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Send being removed from the Green Belt. The village Send provides a green buffer between Woking and Guildford. To develop in the Green Belt requires ‘special circumstances’ there are none to justify developing the land in and around Send so Guildford Borough Council have come up with another plan, to remove Send from the Green Belt therefore freeing up the area for development. Guildford Borough Council should not be allowed to abuse the Green Belt in this way in order to just suit themselves. The Green Belt was set up to control urban growth from unscrupulous Council’s and Developers permanently. If this is not protected then all of the land in and around the village will be vulnerable to development. This would destroy the character of the village of Send. Guildford would merge with Woking through a series of urban estates.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6298  Respondent: 15062625 / Stephen Groves  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Send Village being removed from the Green Belt. The Green Belt was intended to be permanent, as required by the National Planning Policy Framework, and there are no special circumstances to justify abandoning it. Send’s Green Belt provides an essential buffer stopping Woking and Guildford becoming one large conurbation. Local councillors and central government gave a clear election promise to protect the Green Belt and this plan reneges upon that election promise. Developers will be quick to take advantage of the removal of Send from the Green Belt and then there will be nothing to stop further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/417  Respondent: 15062817 / Keith Liddell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( Yes ), is Legally Compliant? ( Yes )

I agree with these proposed changes

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
### Comment ID: pslp171/214  **Respondent:** 15063745 / John Pryce  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

<table>
<thead>
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**Policy P2, Green Belt**

I object to the proposal to inset Send Business Park from the Green Belt because it is essential to conserve the Green Belt wherever possible. In this case Send Business Park is a non-conforming user in an area of outstanding countryside close the Wey Navigation, which is cherished by walkers of all kinds and from all parts of the country.

There is extremely restricted vehicular access along Tannery Lane, which makes expansion of this site totally inappropriate.

Overall, the Green Belt was designed to provide a cordon of countryside and green fields around London, and should be kept sacrosanct in respect of its original purpose.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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### Comment ID: PSLPP16/17  **Respondent:** 15064481 / Colin and Sue Henderson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

<table>
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</tr>
</thead>
</table>

Finally, I object to Send being removed from the "Green Belt" designation. It is a lovely area that serves to separate the already sprawling Guildford and Woking. Soon, there will be no differentiation.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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### Comment ID: PSLPP16/29  **Respondent:** 15067361 / Nicola Adams  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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</table>

1) This policy directly conflicts the government’s objective in the NPPF to “assist in safeguarding the countryside from encroachment”, and that “once established, Green Belt boundaries should only be altered in exceptional circumstances”. Normal population growth does not constitute exceptional circumstances which would justify removal of Green Belt status with the associated loss of rural character of the village.

Under the NPPF policy #86, “If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt.”

Ref West Horsley: As a minimum, the southern part of West Horsley (south of the railway line) strongly meets these criteria, being characterised by low housing density, open countryside views and bordering directly onto both National Trust and AONB lands, and should remain in the Green Belt with its existing boundaries intact. This area should be...
considered separately to the northern area of West Horsley which directly adjoins East Horsley and is developed to a greater degree (though still a rural village).

2) Expansion of the village settlement boundary vs Local Plan 2003

Together with the insetting policy, the proposed expansion of the settlement boundary vs LP 2003 would remove additional undeveloped green spaces from the Green Belt, rapidly hastening village expansion and encroachment on the neighbouring countryside. There is no supportable basis for this expansion which contradicts the NPPF policy that local planning authorities should “define boundaries clearly, using physical features that are readily recognisable and likely to be permanent” and the above government objective to safeguard the countryside from encroachment.

I want to specifically highlight the area to the east of The Street currently outside the settlement boundary, including the Village Green and neighbouring undeveloped land which contributes to the village’s rural character, which would not be best served by being included in the settlement.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: WH_Boundaries.png (520 KB)
WH_The_Street_Boundaries.png (2.5 MB)

Comment ID: PSLPP16/17834  Respondent: 15067361 / Nicola Adams  Agent: 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

As a resident of West Horsley I write to you with regards the Guildford Borough Proposed Submission Local Plan (Reg 19) 2016 draft which was issued in April, and is now under public consultation.

Having reviewed the submitted document, I am very concerned at the potential implications for the rural village of West Horsley, and challenge the following key points:

1. A) Policy P2: Removal (‘insetting’) of the village from the Green Belt

- This policy directly contradicts the government’s objective in the NPPF to “assist in safeguarding the countryside from encroachment”, and that “once established, Green Belt boundaries should only be altered in exceptional circumstances” . Normal population growth does not constitute exceptional circumstances which would justify removal of Green Belt status with the associated loss of rural character of the village.

- Under the NPPF policy #86, “If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt.”

As a minimum, the southern part of West Horsley (south of the railway line) strongly meets these criteria, being characterised by low housing density, open countryside views and bordering directly onto both National Trust and AONB lands, and should remain in the Green Belt with its existing boundaries intact.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/26  Respondent: 15067425 / Anita Fairbairn  Agent:
<table>
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<th>Document:</th>
<th>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</th>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<tr>
<td>I object to the proposed plan. Building should be done on brownfield sites not Greenbelt. Send provides a buffer between Guildford and Woking and has Greenbelt status. Vulnerable areas of land being taken out of the Greenbelt include the land behind Send school, the land to the right and left of Cartbridge by the River Wey navigation. The land at Garlick's copse is covered in ancient woodland. Trees which existed in the 16th century would be endangered.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<tr>
<td>Attached documents:</td>
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</tbody>
</table>

| Comment ID: pslp171/1854  Respondent: 15067585 / Ann Elms  Agent: |
| Document: | Proposed Submission Local Plan: strategy and sites 2017 / Policy P2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| I fiercely object to **Green Belt, Policy 2 at paragraph 4.3.15** to remove Send Business Park from the Green Belt. This area should not really exist in the first place as it is in an area of beautiful countryside next to the Wey navigation system. Traffic access till be a nightmare in both directions and further development is completely inappropriate and will ruin the Green Belt. |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |

| Comment ID: PSLPP16/643  Respondent: 15068257 / Thomas Tuck  Agent: |
| Document: | Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| I OBJECT TO THE 2016 DRAFT LOCAL PLAN on the following points; |
| 1) I object to the erosion of the Green Belt. |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |

| Comment ID: PSLPP16/644  Respondent: 15068257 / Thomas Tuck  Agent: |
| Document: | Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| 6) I object to "in-setting", removal of villages from Green Belt |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
Comment ID: PSLPP16/30  Respondent: 15068737 / Angela Blaydon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy P2.

I object to Send being removed from the green belt. If the proposals go ahead we lose more green space and this could then open the door for development on surrounding green belt land that will eventually join Woking and Guildford into one large conurbation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4187  Respondent: 15076513 / Ian Groden  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I further object to building on green belt because I am reminded that it is an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity. It is truly precious beyond the short term demands of the present Government’s policy or a 15 year plan. It benefits public health and wellbeing, physical and psychological health. Chipping away at a natural heritage can only lead to more future cuts to benefit developers and the radical transformation of a largely rural borough into a mainly urban or suburban one.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4195  Respondent: 15076513 / Ian Groden  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I strongly object to the removal of Send from the Green Belt (Policy P2) and also building along the Portsmouth road and the A3 on the Land at Garlick’s Arch. It may not be of marked beauty but it provides a vital role as countryside rather than town and a “breathing space” break for residents and travellers. What are the exceptional reasons for taking it out of Green Belt?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/583  Respondent: 15080865 / Adar Sinai  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to policy 2 at paragraph 4.3.15;

I object to the proposal to inset Send Business Park from the green belt because there is highly restricted vehicle access along Tannery Lane, which is very narrow. This is an area of outstanding countryside adjacent to the beautiful river wey navigation and once again this is another attack on the green belt, which is inappropriate and should be protected at all costs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/32  Respondent: 15081281 / Sabine Marke-Deleau  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Policy P2. Send should not be removed from the Green Belt. The green belt separates that villages from Woking and Guildford, is essential to local wild life including some buzzards that now live in the fields behind Boughton Hall Avenue and we need the flood plains still to prevent flooding further down the river.

There is no need to be destroying our beautiful countryside and endangering ancient trees, local wildlife and the existing quality of life for current residents. Green Belt is Green Belt for a reason, please respect that.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/728  Respondent: 15081569 / Gary Cable  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am a resident of Send Marsh and I recently attended a local meeting where the New Local Plan was discussed and some questions were put to 2 Guildford councillors involved in the creation of the local plan.

I came away from the meeting with numerous unanswered questions and the feeling that Guildford BC is determined to destroy the local Green Belt from Guildford right up to the M25 and with it the destruction of the lovely villages of Send, Ripley and beyond. I object to many aspects of the plan not the least of which:-

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/731  Respondent: 15081569 / Gary Cable  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
* The wholesale destruction of Green Belt including 2000 homes at Merrow and without doubt the 2000 homes at Wisley if the 4 way junction at Burnt Common goes ahead

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/34  Respondent: 15081729 / peter mccarthy  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

I object as i do not believe that removing Send from the green belt as it currently provides a buffer between Woking and Guildford and does not have the infrastructure to support any major house or industrial building works within it's boundaries. in addition, any further loss of open land will lead to a further loss of habitat to the current wildlife that surrounds this village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13267  Respondent: 15084545 / Andrew Wilton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Our Green Belt is precious to all of the residents within Horsley. It is what protects London from urban sprawl; it preserves air quality; it prevents flooding. It is for us to conserve and protect it. There are 5 legal purposes for Green Belt, and it meets them all:

• To check the unrestricted sprawl of large built up areas
• To prevent neighbouring towns merging into one another
• To assist in safeguarding the countryside from encroachment
• To preserve the setting and special character of historic towns
• To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

NO EXCEPTIONAL CIRCUMSTANCES

The local plan proposes additional housing stock to the area, 385 new homes being built in West Horsley (a 35% increase on the current housing number of 1,111) and an additional 148 homes proposed for East Horsley.

I am totally opposed to the village's removal from the Green Belt by insetting and extending the 2003 Local Plan Settlement Area boundaries

Our local doctors surgery cannot cope now with the current resident numbers, with constant difficulty in making appointments.

The Raleigh school which serves both East and West Horsley is full every year and this has been the situation for many years. There is a continuing lack of state primary school places in the village.
Our local waste drainage, our water supply, our medical facilities and our roads cannot cope with the proposed number of new homes. Building this number of homes will lead to further flood risk here and downstream. The planned development on Green Belt is therefore unsustainable.

In conclusion, I must ask you to revise the housing number, and to amend the Local Plan to utilise brownfield land rather than green field sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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8 THE NEED TO APPLY CONSTRAINTS

8.1 Ministerial guidance in relation to building on the Green Belt is clear:

1. “the single issue of unmet need - is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development in the Green Belt” - Nick Boles to Sir Paul Beresford MP 7th February 2014.

2. “we were always very clear that we would maintain key protections for the countryside, and, in particular, for the Green Belt. The Framework makes it clear that a Green Belt boundary may be altered only in exceptional circumstances and reiterates the importance and permanence of the Green Belt” – Nick Boles to Sir Michael Pitt, Planning Inspectorate 3rd March 2014. 3. “Planning Guidance, updated in March 2014, also states that unmet housing need is unlikely to outweigh the harm to the Green Belt to constitute the very special circumstances justifying inappropriate development within the Green Belt” – Nick Boles to Sir Paul Beresford MP 18th June 2014

8.2 70% of the sites put forward in the Local Plan are in the Green Belt which flies in the face of current government planning policy. The National Planning Policy Framework (NPPF), National Planning Policy Guidance and case law make it clear that Green Belt is an absolute constraint on housing supply. Exceptional circumstances need to be shown to adjust boundaries.

8.3 Other constraints under the NPPF include assessments of sustainability, strategic flood risk assessment, physical constraints on land use and infrastructure constraints (this can include road congestion, schools, drains, power supply and medical requirements).

8.4 Constraints should be applied to the Objectively Assessed Housing Need (OAN). However this itself is overstated and should be reduced from 693 per annum to 500.

8.5 In view of the comments above it would appear logical to apply CONSTRAINTS in line with government policy to a corrected OAN. of approximately 50% to account for the fact that 89% of the borough is in the permanent Green Belt and development is not supported by adequate major infrastructure. This reduction is in line with the constraints percentage of 50% applied by Woking Borough Council.

8.6 This would result in a more acceptable and practically achievable HOUSING TARGET of 250 homes per annum which over a 20-year period would be 5,000 homes. All of these homes could be built in the existing urban brownfield areas of the borough and would in part satisfy the 20,000 objections made by residents to the 2014 draft plan and also relieve the additional problems of inadequate infrastructure.

8.7 It would also mean that there is currently 8.5 years supply of housing (2131/250) which is made up of existing permissions granted (1,518) and completions made (613) during 2013/2015. (Monitoring Report by GBC 2015)
8.8 I have recently (9 July 2016) had a meeting with Sir Paul Beresford my own MP for Mole Valley who has kindly assured me that he is in the process of speaking to the Secretary of State to ratify the current government policy of protecting the Metropolitan Green Belt and to instruct the Planning Inspectorate and Local Planning Authorities accordingly. This is in the wake of the recent national referendum and the likelihood of the easing pressure on international immigration over the next 20 years.

8.9 The Brexit vote may have strengthened government policy further. Theresa May, the new prime minister in waiting, announced on 11 July that she is personally committed to protecting the Green Belt once she takes office.

8.10 Whilst I have many significant objections to the GBC Local Plan I applaud the policy statement by GBC in their Monitoring Report, “We will continue to monitor the use of previously developed land, and continue to identify as many opportunities as possible for redevelopment of previously developed land.” I believe it will be to the benefit of all residents if GBC can apply themselves vigorously to this endeavour in order to protect the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4752  Respondent: 15084897 / Save Send Action Group (Andrew Procter)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

13 POLICY P2 GREEN BELT

13.1 I object to Policy P2 green belt

13.2 This policy states, “the general extent of the Green Belt has been retained.” This is completely false.

13.3 The policy wording is weak in support of the Metropolitan Green Belt even though the latter forms 89% of the borough and should be the cornerstone of all local planning policy. It is precious beyond the short-term demands of the present Government’s policy or a 15-year local plan. As noted under Policy S1 above, it is a solemn legacy to future generations – an asset and amenity that belongs as much to Londoners and the whole nation as to the people who live in it. It is an inalienable public good. Once gone it is gone forever. It is not the Council’s to give away.

13.4 Policy P2 completely fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it has been around for a long time and it needs to be permanently protected. It was actually established in a local act of parliament in Guildford under the London Home Counties (Green Belt) Act 1938 and subsequently in the 1944 Greater London Plan to contain the outward sprawl of London. The boundaries of the Green Belt through Guildford Borough were later defined in the 1987 Local Plan, forming part of a 19-24km concentric belt around London. The Green Belt is intended to check the unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and other urban land. The principles of the Green Belt designation were outlined within Planning Policy Guidance 2: Green Belts (PPG2) and are found within the National Planning Policy Framework (NPPF). The Metropolitan Green Belt is an exemplar of good planning and the envy of planners throughout the world.

13.5 Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. Building on it involves high opportunity costs, including an irreversible loss of:

1. Agricultural production
2. Rural leisure and tourism amenities1
3. Water catchment
4. Flood control
5. Biodiversity
6. Natural heritage
7. A carbon sink for air pollution
8. Room for public facilities such as parks and burial grounds
9. Profitable film locations (e.g. Shere)
10. Future economic potential such as mineral extraction (even fracking)
11. Natural beauty, landmarks, open space, rural views and sight lines
12. Benefits to public health and wellbeing, physical and psychological (as well expressed in the NPPF)

13.6 As a matter of law and national and local policy, these assets should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultations.

13.7 It is quite incorrect to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold. No-one argues that we should sell 1.6% of the Crown jewels in order to build houses.

13.8 I object to the “insetting” of 14 villages from the Green Belt, and at “infilling” 12 of the borough’s Green Belt villages. I am deeply disturbed that settlement boundaries are to be hugely extended in many villages and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are ‘leggy’ in outline, reflecting the effect of ribbon development (often along just one side of existing roads) permitted between the Wars. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost hell bent on self-defeat.

13.9 I believe this policy is based on a flawed Green Belt and Countryside Study that, according to one Conservative Councillor, was irregularly commissioned by Council officers without the authority of Councillors.

13.10 To “inset” two thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, although they would quickly destroy them if the proposed “insetting” and boundary extensions go ahead. This policy is wildly disproportionate in terms of any foreseeable development need (especially post-Brexit) and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

13.11 Send is a good example of villages that **should not be removed** from the Green Belt. Send provides an important Green Belt buffer between Woking and Guildford. Yes, it is true that Send comprises old ribbon development but this should not mean it can be removed from the Green Belt so that Woking joins up to Guildford. The village and the countryside behind the A247 should all be protected.

13.12 I object to three particularly vulnerable areas of high quality amenity land being taken out of the Green Belt around Send which include:

1. The land behind the schools including playing fields and woodland.
2. The land to the right of Cartbridge by the River Wey Navigation up to the new boundary fence with Vision Engineering.
3. Land to the left of Carbridge going up to the old depot on the Wey Navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID:</th>
<th>PSLPP16/4797</th>
<th>Respondent:</th>
<th>15084897 / Save Send Action Group (Andrew Procter)</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

37 GREEN BELT SITES

37.1 I object to ALL Green Belt sites allocated for development in the local plan

37.2 I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development, however, it does identify the principle of development and uses.” This ignores the tens of thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. This amounts to a war of attrition by the Council in conjunction with developers, since many busy residents are sick and tired of repeating the same comments to deaf ears. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014.13

37.3 There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

37.4 All Green Belt sites should be removed from the plan until “exceptional circumstances” for development are proven, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1.1 I object to the changes to Policy P2 because they have not addressed many of the 32,000 objections made to the 2016 plan.

1.2 I object to the new para (1) “The Metropolitan Green Belt will continue to be protected as shown designated on the Policies Map, against inappropriate development. In accordance with national planning policy, the construction of new development will be considered inappropriate and will not be permitted unless very special circumstances can be demonstrated.” The words “as shown designated on the Policies Map” should be deleted. The Policies Map has effectively ignored huge areas of Green Belt protection and the new para (1) is therefore a sham.

1.3 I object to the proposed change that Send Business Park should be inset from the Green Belt due to the fact that:

1.4 It is effectively a non-conforming user in an area of beautiful countryside adjacent to the beautiful Wey Navigation
1.5 It has restricted access along Tannery Lane

1.6 It should not be given the opportunity for further expansion or development

1.7 Policy P2 still completely fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it has been around for a long time and it needs to be permanently protected. It was actually established in a local act of parliament in Guildford under the London Home Counties (Green Belt) Act 1938 and subsequently in the 1944 Greater London Plan to contain the outward sprawl of London. The boundaries of the Green Belt through Guildford Borough were later defined in the 1987 Local Plan, forming part of a 19-24km concentric belt around London. The Green Belt is intended to check the unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and other urban land. The principles of the Green Belt designation were outlined within Planning Policy Guidance 2: Green Belts (PPG2) and are found within the National Planning Policy Framework (NPPF). The Metropolitan Green Belt is an exemplar of good planning and the envy of planners throughout the world.

1.8 Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital.

1.9 It is quite incorrect to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold. No-one argues that we should sell 1.6% of the Crown jewels in order to build houses.

1.10 I object to the statement in the Draft Local Plan under Green Belt Policy P2 (4.3.13) which claims that Send and a further list of 13 villages are “now inset from the Green Belt”.

1.11 This statement is untrue as GBC is proposing to “inset” these village. No decision has been made by an Inspector, therefore the villages remain in the Green Belt!

1.12 I object to the changed “insetting” of 15 villages (including Ripley) from the Green Belt, and at “infilling” 12 of the borough’s Green Belt villages.

1.13 I am deeply disturbed that settlement boundaries are to be hugely extended in many villages (particularly at Send) and that infilling is also proposed outside the settlement boundaries of 11 further villages. This is completely unplanned and unmeasured development outside of the OAN.

1.14 Many Guildford villages are “leggy” in outline, reflecting the effect of ribbon development (often along just one side of existing roads) permitted between the Wars. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost hell bent on self-defeat.

1.15 Send is a good example of villages that should not be removed from the Green Belt. Send provides an important Green Belt buffer between Woking and Guildford. Yes, it is true that Send comprises old ribbon development but this should not mean it can be removed from the Green Belt so that Woking joins up to Guildford. The village and the countryside behind the A247 should all be protected.

1.16 I object to three particularly vulnerable areas of high quality amenity land being taken out of the Green Belt at Send which include:

1.17 The land behind the schools including playing fields and woodland.

1.18 The land to the right of Cartbridge by the River Wey Navigation up to the new boundary fence with Vision Engineering.

1.19 Land to the left of Cartbridge going up to the old depot on the Wey Navigation.
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<tr>
<td>I object to the removal of Send from the Green Belt because the village and its countryside provides a necessary buffer between Woking and Guildford.</td>
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<td>I object to the building on the Green Belt at Send at Garlick’s Arch, Clockbarn Nurseries and Send Hill because it is not justified by any special circumstances and the fact that Green Belt is meant to be permanent and not continually eroded.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td>I object to the large proposed development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.</td>
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<tr>
<td>I OBJECT. Send should not be removed from the Green Belt. The village provides an important buffer between Woking and Guildford and without the Green Belt status the entire area will be covered in urban sprawl. There are no exceptional circumstances which give GBC the right to do this. In particular the land at Garlick's Arch is covered in ancient woodland and should not be built upon.</td>
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Green Belt Policy 2 at Paragraph 4.3.15
I object to the proposal to inset Send Business Park from the Green Belt because
Further expansion or development in this location detracts from the openness of the Green Belt
It is an area of outstanding Natural Beauty adjacent to the beautiful Wey Navigation
There is highly restricted vehicular access along Tannery Lane in both directions, it is extremely narrow.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8983  Respondent: 15098945 / ALISON TURNER  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY P2.Send should not be taken out of the Green Belt Send provides green space between Woking and Guildford.
   1. Send is a much loved village which actively encourages village activities.
   2. It has strong historic links to the local area including Henry VIII, Sir Francis Drake, one of the oldest churches in the country as well as its links to neighbouring historic Ripley.
   3. There is outstanding countryside in Send and its surrounding areas including country lanes and peaceful Wey Navigation walks.
   4. It would be a huge loss to erode our much loved village by taking it out of its Green Belt protection.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/47  Respondent: 15099265 / Andrew Crawford  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I would like to lodge my strong objection to the Guildford Local Plan 2016.

1. Failure to protect the Green Belt
   I object to the proposals to remove Ripley, Send and Clandon from the Greenbelt. There are no special circumstances to do this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/48  Respondent: 15099265 / Andrew Crawford  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

1. **Disproportionate size of sites in relation to rural locations**
   I object to the allocation of land to the strategic sites of Wisley Airfield, Garlicks Arch (Ripley/Send border) and Gosden Hill (Clandon). The proposed development of these sites will have a disproportionate and permenant impact on the surrounding local villages.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

1. Under Policy P2 you are proposing that Send should be removed from the Green Belt. I object to this on the grounds that Send provides a needed buffer between Woking and Guildford.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Green Belt, Policy 2 at paragraph 4.3.15**

I object to the proposal to inset Send Business Park from the Green Belt because it is an old non-conforming user in an area of outstanding countryside adjacent to the river Wey navigation. The roads are highly restricted for vehicle access on Tannery Lane in both directions. Development here would detract from the openness of the Green Belt and is inappropriate.

Please can you ensure my objections above are submitted as part of the Local Plan Consultation.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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I object to the policy of inserting send business park from green belt because the access is very restricted in Tannery lane and an increase of development would only increase traffic.

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Please accept the following reasons why I object to the 2016 draft local plan; I object to all erosion of the Green belt I object to any "insetting (ie removal) of any villages from the green belt

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</table>
I am writing to express my objections to the ill thought out planning proposals for the area in which I live and for a much larger area which includes erosion of the green belt. There is no apparent thought to provision of schools, surgeries and general amenities for the large surge in population which will result not to mention the fact that the present roads will not support the huge increase in traffic. The disregard for the importance of the green belt is beyond belief and the proposed amount of development in one area seems ridiculous. The limited time for consultation has been quite inadequate and I can only hope that some one will consider these objections before proceeding with the proposed plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/112  Respondent: 15105793 / David Clue  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I totally object to Ripley Send and Clandon being removed from the green belt it would spoil the lives of people who live in these villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13775  Respondent: 15106593 / Louise Clark  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Send village being removed from the Green Belt on the basis that it was intended that this would be permanent as required by the national Planning Policy Framework. The Green Belt prevents any joining of Woking & Guildford in a large unwelcome and anti-social conurbation, removing essential natural landscape. Removal reneges on election promises and gives a free rein to developers for ever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/118  Respondent: 15106689 / Joseph Hine  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Local plan 2016 for the following reasons

1. I object to insetting of the local villages of Ripley, Send and Clandon from the Greenbelt. The purpose of the greenbelt is to prevent urban sprawl, as such removing the villages specifically those located between your identified strategic sites at Wisley airfield and Garlicks Arch would seem to be encouraging an urban sprawl directly damaging the integrity of the greenbelt. As these Strategic sites sandwich Ripley it would seem highly
It is important for Ripley to remain washed over within the greenbelt to provide separation and identity to any proposed new developments and those existing at present.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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</tbody>
</table>

My name is Mr Puckle, my wife and I are the owners and residents of [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998]. I would like to lodge my objections to the 2016 draft local plan for the following reasons:

- I object to removing Ripley, Send and Clandon from the Greenbelt. There are no special circumstances to remove these villages and once this beautiful greenbelt with beautiful woods and natural wildlife habitats has been lost it will never return.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/133</th>
<th><strong>Respondent:</strong> 15106977 / Y C Smithers</th>
<th><strong>Agent:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td></td>
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<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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</tbody>
</table>

I strongly object to the Green Belt status being eroded away from Send Village. I appreciate more housing is required but there are a number of brown fill land sites in the borough on which to build.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/162</th>
<th><strong>Respondent:</strong> 15106977 / Y C Smithers</th>
<th><strong>Agent:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td></td>
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<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
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</tr>
</tbody>
</table>

I strongly object to the Green Belt status being eroded away from Send Village. I appreciate more housing is required but there are a number of brown fill land sites in the borough on which to build. I object to the plans for the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley, land for new north facing slip roads to/from A3 at Send Marsh/Burnt Common and Clockbarn Nursery, Tannery Lane.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
Green Belt, Policy 2 at Paragraph 4.3.15

I object to the proposal to inset Send Business Park from the Green Belt because it is in a restricted vehicular access area along Tannery Lane from both directions and further expansion and development is not in keeping and will detract from the natural beauty of the area. The existing infrastructure is not sufficient to cope with any increase in traffic and building development. It will seriously impact the area of outstanding building along the Wey Navigation, which my family and friends have enjoyed for many years.

My wife and I have lived in Send in excess of 24 years. I originally grew up in Send and we chose to return to the village to enjoy our retirement. We have family and friends living close by, including both my daughters and grandchildren, all of whom regularly visit us. The proposals above would considerably change the way of life in the village and surrounding area, we along with many others chose to buy in Send because of its village environment and rural setting, away from built up areas. We live in Potters Lane and are impacted every day by commuters speeding through to and from the A3, both my wife and I and are family have had our cars damaged from cars speeding past and not keeping to their lane and clipping our cars.

I appreciate more housing is required but there are a number of brown fill land sites in the Borough on which to build. I strongly object to the Green Belt status being eroded away from Send Village. I do hope you will take my comments on board along with the many other residents of Send who very much care about their village and its surroundings and who have lived in the village for many years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT TO POLICY P2 (GREEN BELT):

- No declaration of support for protecting the Guildford Green Belt, contrary to NPPF and government statements.
- No evaluation of value of local Green Belt as a public and private asset: it’s just treated as potential building land with a few inconvenient restrictions.
- Impact of Green Belt development on local agriculture ignored.
- Impact on rural leisure and tourism ignored.
- Impact on flood control ignored.
- Impact on carbon sink and knock-on effects for air pollution and climate change ignored.
- Impact on biodiversity ignored.
- Impact on national heritage ignored.
- Impact on water catchment ignored.
- Impact on room for public space amenities (parks, cemeteries, waste facilities etc) ignored.
- Impact on rural business (e.g. mineral mining, film making) ignored.
- Impact on natural landmarks and views ignored.
- Harm to public health and wellbeing (physical, psychological) ignored.
- Allows excessive levels of development in breach of views expressed in last consultation and Conservative Party manifesto commitments at the last local elections.
- Has allowed ruling Councillors to argue that there is an acceptable percentage of Green Belt that should be sacrificed to development, when no such rule exists in the NPPF.
- Ignores alternative approaches, such as fair burden-sharing under which settlements would undertake to accommodate new development in proportion to their size.
- Disproportionate amount of development (most of it, in fact) to be in Green Belt. Too few new homes in urban areas where most people (especially the young and less privileged) want to live. This will act against much needed urban regeneration.
- “Insetting” of most villages disproportionate and unjustified in terms of their contribution under the NPPF to the purposes of the Green Belt. Based on flawed Green Belt and Countryside Study. Idea that most Guildford villages do not contribute to “openness” is subjective.
- Major settlement extensions allow indiscriminate housebuilding, as irregularly shaped villages are squared off to enclose green fields.
- Overall harm to Guildford Green Belt unjustified by any objective development need post-Brexit.
- Ignores most of NPPF 17 stipulations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/140  Respondent: 15107937 / Ken Harding  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing to strongly object to many issues contained in the unbelievably long
document of about 1800 pages covering the Draft Local Plan.

Firstly I object to the any erosion of the Green Belt and strongly object to any removal
of villages from the Green Belt, including Ripley where I have lived for the last forty years.

There appears to be no sensible reason or logic in this "in-setting" which will just help to
hasten the destruction of our rural environment and village life, and open the flood gates
for more and more building in previously rural areas to further destroy the natural surroundings.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/150  Respondent: 15108801 / David Allison  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

"I OBJECT TO THE 2016 DRAFT LOCAL PLAN"

I have been made aware of the above development proposals affecting our villages.

Whilst I recognise the need for housing developments my main objection is the use of "Green Belt" land.

I have read numerous development proposals which could be located on "Brown Field" sites which I have no objection to.

The other serious issue is the infrastructure associated with the above proposals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/153  Respondent: 15108833 / Barry Armstrong  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
The Green belt seems to be coming under increasing pressure without the slightest regard for the increased capacity on the infrastructure needed to sustain the constant bombardment of outrageous developments in the villages of Ripley, Send, Oakham and Wisley.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/165  **Respondent:** 15109377 / Cara Crawford  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I would like to lodge my strong objection to the Guildford Local Plan 2016.

1. **Failure to protect the Green Belt**

   I object to the proposals to remove Ripley, Send and Clandon from the Greenbelt. There are no special circumstances to do this.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/2812  **Respondent:** 15109537 / Elizabeth Alexander  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/176  **Respondent:** 15110721 / Stuart Reeves  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )
I object to the plan. Send provides a buffer between Woking and Guildford and should not be removed from the green belt. the land west of winds ridge and send hill is a new site and was not included in the regulation 18 and has not been consulted upon previously. Development for housing is inappropriate due to its perminant green belt status and high quality green belt amenity within an area of beautiful countryside which would be spoilt by development. The subsoil of the existing site is also inappropriate for housing and the access road on Send hill is a narrow single width track unsuitable for access and additional volumes of traffic.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/181</th>
<th><strong>Respondent:</strong> 15111873 / Cindy Knight</th>
<th><strong>Agent:</strong></th>
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</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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</table>

I strongly object to the above Plan for the following reasons:

1) I object to the removal of our villages i.e. Ripley, Send, Clandon from the Greenbelt as I feel that once removed the Greenbelt will be lost forever.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/188</th>
<th><strong>Respondent:</strong> 15111905 / Wendy Reed</th>
<th><strong>Agent:</strong></th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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</tbody>
</table>

Therefore I want to formally confirm that:

I OBJECT TO any/all erosion of the green belt

I OBJECT to any 'in-setting' of any villages from the green belt

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/192</th>
<th><strong>Respondent:</strong> 15112193 / Jennifer Reigate</th>
<th><strong>Agent:</strong></th>
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</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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</table>

I object to the proposal to remove Ripley,Send and Clandon from the Greenbelt. There are no clear reasons to do this.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/206</th>
<th>Respondent: 15112769 / Gordon Laidlaw</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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<tr>
<td>I also object strongly to the dictatorial edict proposed to withdraw the Green Belt status of Send.</td>
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<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<tr>
<th>Comment ID: PSLPP16/217</th>
<th>Respondent: 15112769 / Gordon Laidlaw</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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<tr>
<td>Without protection of the Green Belt all types of unacceptable developments such as these would appear in our villages.</td>
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<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<table>
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<tr>
<th>Comment ID: PSLPP16/211</th>
<th>Respondent: 15113281 / Mr and Mrs Richardson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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<tr>
<td>WeI write with reference to the proposed development on Green Belt Land of 400 houses and an industrial site at Garlicks Arch – Burnt Common Send Ripley Borders which has been drafted into the Guildford Local Plan 2016. We would like to register my objection to this proposed development for the following reasons:</td>
<td></td>
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<tr>
<td>1) Erosion of the Green Belt –</td>
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<tr>
<td>We strongly object to this development as it is proposed on a Green Belt site. Once this area is developed not only will this part of the Green Belt be eroded, but it will set a precedent for future development and erosion of the green belt – not only in Send/Ripley and Clandon villages but on other green belt sites within the Guildford area. The Green Belt should and must be protected, and whilst I appreciate the need for more housing in Guildford, there are plenty of brownfield sites which can be redeveloped. Also, it is alarming that not only is housing proposed on the greenbelt, but also an industrial site – which will have a negative impact on the surrounding environment e.g. pollution, long term damage to the surrounding countryside and the animals within this area (for example the deer which often use this land for grazing).</td>
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<tr>
<td>Furthermore, we also object to the proposed removal, through “in-setting”, of several villages from the Green Belt (eg Send, Ripley, Send, Clandon and Wisley to name a few).</td>
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We write with reference to the proposed development on Green Belt Land of 400 houses and an industrial site at Garlicks Arch – Burnt Common Send Ripley Borders which has been drafted into the Guildford Local Plan 2016. We would like to register my objection to this proposed development for the following reasons:

1) **Erosion of the Green Belt** –

We strongly object to this development as it is proposed on a Green Belt site. Once this area is developed not only will this part of the Green Belt be eroded, but it will set a precedent for future development and erosion of the green belt – not only in Send/Ripley and Clandon villages but on other green belt sites within the Guildford area. The Green Belt should and must be protected, and whilst I appreciate the need for more housing in Guildford, there are plenty of brownfield sites which can be redeveloped. Also, it is alarming that not only is housing proposed on the greenbelt, but also an industrial site – which will have a negative impact on the surrounding environment e.g. pollution, long term damage to the surrounding countryside and the animals within this area (for example the deer which often use this land for grazing).

Furthermore, we also object to the proposed removal, through “in-setting”, of several villages from the Green Belt (eg Send, Ripley, Send, Clandon and Wisley to name a few).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID: PSLPP16/221  Respondent: 15114017 / Jo Wright  Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I live on Burnt Common Lane and I **strongly object** to the amount of Green Belt being removed from Send/Ripley in the new local plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID: pslp171/306  Respondent: 15114017 / Jo Wright  Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to policy 2, para 4.3.15 to inset Send Business Park from the Green Belt because:

1. There is very restricted vehicular access along Tannery Lane in both directions
2. Further development here detracts from the openness of the Green Belt and is inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/230  Respondent: 15114145 / Barry Roads  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to local villages (Send, Ripley, Clandon, Wisley) being removed from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/237  Respondent: 15114657 / Jane Hill  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the 2016 draft local plan for the following reasons:
1) I object to all erosion of the green belt as the village won't be the same.
2) I object to any removal of villages from the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/239  Respondent: 15114721 / Leslie Macnair  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1 I object to all erosion of the green belt
2 I object to any removal of any villages from the green belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/241  Respondent: 15114721 / Leslie Macnair  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
<table>
<thead>
<tr>
<th>Comment ID: pslp171/751</th>
<th>Respondent: 15114721 / Leslie Macnair</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
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</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>I object removing Send Business Park from the Green Belt (4.3.15).</td>
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<tr>
<td></td>
<td>Send Business Park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for its insetting (removal) from the Green Belt, and indeed GBC have not even attempted one. Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.</td>
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<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td>Attached documents:</td>
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<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/243</th>
<th>Respondent: 15114753 / Lauren Pott</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>I write in response to the revised Draft Local Plan.</td>
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<tr>
<td></td>
<td>1) I object most strongly to any and all erosion of the Green Belt</td>
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<tr>
<td></td>
<td>2) I object most strongly to any removal of any villages from the Green Belt</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<tr>
<th>Comment ID: pslp171/96</th>
<th>Respondent: 15115201 / Katherine Mutton</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>I object to Green Belt Policy 2 at paragraph 4.3.15</td>
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<tr>
<td></td>
<td>• It is unacceptable to take the Send Business Park out of the Green Belt as it paves the way for further unwelcome construction.</td>
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</tbody>
</table>
• Tannery Lane is narrow and the access to other roads is bad.

I wish my objections to be put forward to the Planning Inspector.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/257  Respondent: 15120641 / Elizabeth Wolfe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. Green Belt

2.1. Proposed Submission Local Plan includes the statement “We will continue to protect the Metropolitan Green Belt”. No this is not the case. The housing policies set out in the Proposed Submission Local Plan; indicate that 65% of proposed new developments will take place on land that is currently in the Green Belt.

2.2. Under NPPF regulations GBC and other Local Authorities are permitted, once they have determined their Objectively Assessed housing Need (OAN), to make allowance for factors which may constrain the delivery of new housing. Constraints such as the need to protect the Metropolitan Green Belt, or the restrictions required to protect the Surrey Hills Area of Outstanding Natural Beauty, or land costs etc. Although these designated areas make up a large proportion of the land area of Guildford Borough, GBC has made no attempt to reduce its housing numbers in order to take account of such constraints. They have instead increased the number, beyond that required for normal growth projections to satisfy their own egotistical view on a path of massive economic growth.

2.3. Currently development is permitted within the settlement boundary, where villages are washed over by the green belt with particular planning regimes being applicable that have proved beneficial in preventing the urbanization of many villages. They are very successful, because of the non urban nature of small scale new development to help to retain the openness of the villages. These villages house, in some cases, a population of 4000 plus people, yet are regarded by residents as small villages. For those who drive through these areas they do not see a mass of urban style developments but trees and hedges, views between homes, views through spaces that don't reveal row upon row of homes but space and openness with trees amongst the homes and a variety of scale and architecture.

2.4. Washing some of the larger villages will result in them becoming their own urban sprawl as a result of disproportionate infilling.

2.5. Changes to settlement boundaries have been made in order to make more land available for the developers under the guise of making the boundaries more defensible. Many straight lines have now been drawn which result in villages developing hard edge profiles with buildings replacing the fragmented softer edge of the original hedgerows, trees and green fields.

2.6. Loss of Green Belt resulting from these boundary realignments can only be justified in exceptional circumstance. None of which have been provided. Moving a boundary from one already defined boundary to another, again can only be done in exceptional circumstance. Housing need has already been turned down as such an exceptional circumstance.

2.7. I object to all these changes being made to the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/268  Respondent: 15122049 / Rebekah Day  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. Not protecting the Green Belt
I strongly object to the proposals to remove Woking, Ripley, Send, Horsley and Clandon from the Greenbelt. There are no special circumstances to do this. Once taken the green belt is lost forever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/273  Respondent: 15125729 / Irene Burrows  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

I object to the removal of Ripley, Send, Sendmarsh/Burnt Common from the Green Belt. This encroachment by the council has not been rigorously justified as required by the Planning Minister. They provide a buffer between Woking and Guildford and their removal would cause real harm to charming and picturesque villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/274  Respondent: 15127649 / Neil Blaydon  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT TO all plans to erode the Green Belt.
2. I OBJECT TO site A43 Garlicks Arch. This site is unsuitable for the proposed development
3. I OBJECT TO all proposals for the removal of villages from the Green Belt by "in-setting".

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/278  Respondent: 15127713 / Emma Connors  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to all erosion of the Green Belt.
I object to any removal of any villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4513  Respondent: 15127777 / Keith Hammond  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Please find my detailed OBJECTION to the Guildford Borough Proposed Submission Local Plan: Strategy and Sites 2016 below.

I’m going to respond regarding my objection in two parts. Firstly the overall plan and secondly issues that are relevant to my local village, West Horsley, and surrounding area.

**Overall Plan**

**Green Belt**

The plan states that ‘National planning policy requires that Green Belt boundaries are only amended in exceptional circumstances’ and ‘We consider that exceptional circumstances exist to justify the amendment of Green Belt boundaries in order to facilitate the development that is needed and promote sustainable patterns of development’

The development that is needed in the borough is a result of normal growth and should be catered for in the normal way. It is not ‘exceptional’ it is normal. It is not due to a new airport, railway line, etc, etc it is just ‘normal’ evolution of the area.

The purpose of the Green Belt is to provide protection from urban growth. If it can be removed to provide for urban growth, that is a tautology!

The plan also tries to argue that some of these locations should not have been ‘washed over’ by the Green Belt in the first place and as per the wording in the plan ‘other development management policies used to restrict any inappropriate development’ in these places.

However other development management policies are not being used to restrict inappropriate development. That requirement is being completely ignored. If these areas are removed from the Green Belt on the basis of this technicality then they should be protected by those other development management policies. Why aren’t they? Why are villages like West Horsley being immediately faced with an increase of 35%? Clearly the alternative protection as defined in the plan is not being applied as required.

Also the new Settlement / Green Belt Boundaries going around the villages that are now being proposed to be inset are, as to be expected, generally hugging the main settlements. However, every so often, the boundary extends out into open countryside and then back again for no explicable reason. It is of no surprise that where it does this are the proposed development sites. This is a cynical opportunity, when insetting these villages, to include open countryside in them that clearly would have, and should have, been in the Green Belt in the first place. It is blatant opportunism when changing the designation of these villages by including lumps of countryside within their Settlement Boundaries. If the villages were not washed over by the Green Belt originally these areas which are now included in the Village Settlements would have been in the Green Belt and untouchable I will cover one specific example in West Horsley below.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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**Setting of the Green Belt / Settlement Boundaries**

If West Horsley is no longer being washed over by the Green Belt then the new boundaries need to be set carefully. I don’t believe I am being cynical when I notice that the new boundary (as one would expect) hugs the settlement closely except in the areas where development is proposed. At these places it goes into open countryside exactly replicating the development plots.

If West Horsley had previously been inset and not washed over by the Green Belt then these boundaries would have been along the edge of the settlement and all these proposed development sites would have still been in the Green Belt and not available for development.

To take the worst example – Site Allocation and Policy A41. It takes great imagination to put the Settlement / Green Belt boundary around this plot and not along the opposite side of East Lane where it clearly should be.

How on earth can anyone think that the Green Belt boundary that runs along East Lane on both sides of this plot should suddenly, for no explicable reason, suddenly bulge out and go around a piece of completely open countryside. Could it have anything to do with a proposal to build 90 houses here?

**Villages Merging**

I notice in the plan that effort is made to ensure villages don’t merge at Ash/Tongham/Ash Green by the addition of new Green Belt. I understand this is something where great effort is being made to avoid coalescence and of course the Green Belt that operated over West Horsley prevented exactly that from happening here. Yet the plans put forward are now apparently encouraging coalescence in West Horsley.

It should be noted that the political/parish boundaries of West Horsley do not represent the physical structure of the village. There are two distinct parts.

There is the original village of West Horsley, including the conservation area, with its own amenities (shop, hall, pubs etc.) and this is entirely surrounded by countryside. The Street goes through the centre of it.

When The Street becomes East Lane (at the junction with Long Reach) this is the start of the rest of West Horsley (where I live). This northern part of West Horsley is actually contiguous with East Horsley and not attached to the more historic part of the village at all. It does not have its own amenities and we tend to use those in East Horsley. This part of West Horsley, around East Lane, is distinct and separate from the original village of West Horsley.

The development proposed on East Lane (Policy A41) is starting that creep of development towards the village part of West Horsley and should not be allowed. The older part of the village of West Horsley should keep its unique identity and not be merged in with East Horsley and the northern part of West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Introduction: The policy A44 refers to new development of green sites which are recovered land fill sites after the closure of Sand Quarries. A major part of this site is currently privately owned by a person who bought it to protect the area from over development in 2002.

The other part is owned by GBC and to date has been left as an open space for the enjoyment of the local community. At the northern end is another piece of land which is owned by a traveller family. There was some consternation some years ago when the travellers set up unauthorized pitches on the land which is covenanted against such use and development. The incomers were evicted with the authority of the council and a deep trench was created to prevent any further incursion. This land is locked in on all sides by public footpaths and there is no vehicular access.

The landfill system won an award and it is well vented and monitored for methane and other pollutants. It is said that before the landfill was capped off, a large quantity of asbestos was dumped on the top level.

The residential setting to the east of these lands provides high quality housing through 57 properties and there is also a cemetery which is in regular use. The road to the junction with Potters Lane is narrow and is often congested at peak hours with traffic to the school at the northern end of Send Hill. The Junction is dangerous as cars and other vehicles

It is proposed that policy P2 would remove Send from the Green Belt to allow for the scale of development that GBC seeks.

I object in principle to this proposal which threatens to change the life of the village residents through over-development and pressure on local resources in health and education. This is an unjustified imposition on local people who will see no benefit to the wider community but certain profits for the developers.

There is already a pattern of through traffic congestion which will be predictably worsened year on year as there is a high local dependency on private cars for people to access their place of work in the local towns. The impact on vehicular pollution levels need to be evaluated as there is strong evidence that such patterns of congestion at peak times when children are starting the school day creates such an impact on their health and development which must not be ignored.

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This land is locked in on all sides by public footpaths and there is no vehicular access. The landfill system won an award and it is well vented and monitored for methane and other pollutants. It is said that before the landfill was capped off, a large quantity of asbestos was dumped on the top level.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/282  Respondent: 15127969 / Jean Fawley  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the local villages of West Clandon, Ripley and Send being part of a massive building program.

I object to any proposal that these villages and surrounding areas being taken out of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/292  Respondent: 15128641 / Caroline Dixon  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO ALL ERROSION OF THE GREEN BELT

I OBJECT ANY "IN - SETTING" OF ANY VILLAGES FROM THE GREEN BELT

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/301  Respondent: 15129441 / Janice Baker  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Introduction: The policy A44 refers to new development of green sites which are recovered land fill sites after the closure of Sand Quarries. A major part of this site is currently privately owned by a person who bought it to protect the area from overdevelopment in 2002.

The other part is owned by GBC and to date has been left as an open space for the enjoyment of the local community. At the northern end is another piece of land which is owned by a traveller family. There was some consternation some years ago when the travellers set up unauthorized pitches on the land which is covenanted against such use and development.
The incomers were evicted with the authority of the council and a deep trench was created to prevent any further incursion. This land is locked in on all sides by public footpaths and there is no vehicular access. Provision of Traveller pitches would compromise the covenant and enable unauthorized development which would be difficult to challenge and expensive on the local purse to resolve.

The landfill system won an award and it is well vented and monitored for methane and other pollutants. It is said that before the landfill was capped off, a large quantity of asbestos was dumped on the top level.

The residential setting to the east of these lands provides high quality housing through 57 properties and there is also a cemetery which is in regular use. The road to the junction with Potters Lane is narrow and is often congested at peak hours with traffic to the school at the northern end of Send Hill. The Junction is dangerous as cars and other vehicles emerge into a short stretch of road that is between two blind bends and there are frequent accidents and near misses.

Traffic at peak times by the school is very congested and there is a high risk to the children who are being dropped or collected at either end of the school day.

OBJECTIONS

I OBJECT TO EVERY ASPECT OF THIS PROPOSAL.

In particular, I object to the proposal for the travellers' pitches. The local plans "ambition" is to improve the quality of existing residents and the introduction of a culturally different group to the area has the likelihood of imposing increased noise, nuisance and traffic which would be detrimental to existing residents. [Response has been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to eliminate discrimination, harassment, victimisation against persons with a protected characteristic; and to foster good relations between persons with a protected characteristic and persons who do not share it]

I object as this is a new proposal and the consultation that is required is a FULL CONSULTATION UNDER REGULATION 18 rather than Regulation 19.

I object as there is a risk to existing residents if the underground asbestos is disturbed while the infrastructure development takes place.

I object as the provision of infrastructure to support 40 homes and two traveller pitches will require a huge disruption to the detriment of existing residents and through traffic. The necessary land clearance and provision of water, sewage, energy and telecoms will create a level of traffic and noise in an area which is noted for its peaceful amenity and rural charm.

I object as the proposal threatens the rural amenity and property values are likely to fall with loss of revenue to the local council and the local economy (eg estate agents) as well as to the Exchequer in relation to stamp duty.

COMMENTS ON OTHER POLICIES IN THE LOCAL PLAN.

Policy P2

It is proposed that policy P2 would remove Send from the Green Belt to allow for the scale of development that GBC seeks.

I object in principle to this proposal which threatens to change the life of the village residents through over-development and pressure on local resources in health and education. This is an unjustified imposition on local people who will see no benefit to the wider community but certain prof its for the developers. There is already a pattern of through traffic congestion which will be predictably worsened year on year as there is a high local dependency on private cars for people to access their place of work in the local towns. The impact on traffic pollution levels need to be evaluated as there is strong evidence that such patterns of congestion at peak times when children are starting the school day creates such an impact on their health and development which must not be ignored.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/302</th>
<th>Respondent: 15130081 / Lydia Duffell</th>
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<td>Objection to Last Minute Plans to Develop Garlick's Arch, Burnt Common, Send, Surrey.</td>
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<td>I wish to object to the proposal to build on the area of land at Garlick's Arch, Burnt Common.</td>
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<td>I am concerned that this will destroy the natural village-atmosphere we currently enjoy in Send and Ripley and believe that this is not the place to concrete over green belt land so necessary to provide a buffer between Woking and Guildford.</td>
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<td>Once Guildford Borough Council begins concreting over Green Belt Land, it will destroy Surrey and its natural charm. I am a student who has lived in this borough all my life - I want it to retain its beauty for future generations not just become an overspill for Greater London sprawl.</td>
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<td>Besides, I am advised that this proposal has not followed the correct process and a road junction has been added. This needs a full consultation to allow local residents to air their grievances, which will no doubt be considerable.</td>
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<td>I believe that new housing should be confined to brownfield sites. Infrastructure in this area is already overloaded.</td>
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<td>Am I correct in believing that 13,860 additional houses have already been proposed for this borough? We do not need any more and this site is new and has not been consulted on previously.</td>
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</table>
I expect Guildford Borough Council to behave in a responsible and indeed legal manner in matters of such importance and not just rush through proposals in the hope that residents will not notice. You can be assured that we will notice and object in the strongest way.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/303  
**Respondent:** 15130817 / D Carter  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I am writing to object to all the planning which I have listed below. I have lived in Ripley and Send and grow from the little villages with house and traffic and not for the better.

1) I object that GBC have not followed correct processes
2) I object that GBC have failed to provide sound evidence in terms of the Employment Land Needs Assessment 2015
3) I object policy P2. Send should not be removed from the Green Belt
4) I object to Policy A43, 30 ha of land at Garlick's Arch, Burnt Common, designated 400 houses and 7,000 sqm of industrial and warehousing
5) I object to Policy A44. 1.9 ha land west of winds ridge and Send Hill, designated for 40 homes and Travellers Pitches

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/127  
**Respondent:** 15131425 / Roger Mutton  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object to Policy 2 at paragraph 4.3.15 I object to the Send Business Park being removed from the Green Belt, yet another unnecessary diminution of the very precious green land in our village. It again will increase pressure on the junction of Tannery Lane and the main road through the village. A narrow lane with added traffic, what a poor way to treat the environment, adding extra business traffic to the area which is an old non-conforming user in an area of outstanding natural beauty.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/128  
**Respondent:** 15131425 / Roger Mutton  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**
I object to the Policy A42 proposal change in Tannery Lane on the grounds that firstly it erodes the Green Belt in our village along with some other plans for the area, but just as important the density of housing is too great for the village. So no additional housing should be contemplated anyway. The lane itself is narrow and the junction into the main village road inevitably will increase hold ups and delays, in turn will increase pollution from the resulting extra traffic, which in turn is putting too much pressure on the road through Send, already a main route to Woking.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/349  Respondent: 15132769 / Nicky Andrews  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the proposed developments in The Guildford local plan 2016. I object to green belt land been taken to be used for housing and industrial use. Particularly at Garlicks Arch where there is ancient woodland at risk. I object to the huge impact that the Guildford local plan 2016 would have on the environment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/355  Respondent: 15133377 / Joyce Vincente  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Loss of Green Belt land: Sadiq Khan, new Mayor of London, has instructed London planners not to approve development on Green Belt Land within the M25. If we continue to build on our countryside it won’t be many decades before we have none left. Creeping development has led to almost continuous housing from Central London to Effingham. Is this to carry on to Guildford and beyond? (1,700 houses are planned for the Guildford.

Conclusions

When my family and I moved to the area we did so because of the village life style, and proximity to the green belt and rural environment.

The local amenities cannot cope with such a large planned expansion and it would completely alter the place that we chose to make our home.

At the heart of the problem is GBC’s desire to pursue a ‘Forced Growth’ policy which results in highly aggressive and unjustified targets being set for housing development in the Borough. These excessive targets – the proposed 25% increase in housing stock in particular – create a tremendous strain on both land and infrastructure in an already over-crowded and over-stretched part of the country.

These targets will also have a material adverse impact on the Metropolitan Green Belt across this area, despite all the political promises made to the contrary.

Accordingly this local resident OBJECTS to the Proposed Submission Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<td>I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.</td>
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<td>I most strongly object to Send being removed from the Green Belt.</td>
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<td>I most strongly object to over 400 houses being built as per policy A43. There has been little consideration given to infrastructure to support this inappropriate development.</td>
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<td>Policy A44 (1.9 ha of land for 40 homes and travellers pitches). This I most strongly object to! Send village is a green buffer between Woking and Ripley/Guildford to continually keep building using the Green Belt is totally unacceptable and I object most strongly to this sort of development.</td>
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<td>Under the National Planning Policy Framework 2012 the Government stated that “The Government attaches great importance to Green Belt. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.”</td>
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<td>Over the last 50 years we have seen the removal of village status from St. Johns, Knaphill, Maybury and others, turning Woking in to one massive urban sprawl. We do not want the same thing to happen to Guildford; a beautiful town where one can see countryside from the very heart of the shopping centre. GBC must spend more time reassessing the brown field sites within the existing area. In addition, your misguided assessment of the need for more shopping and office space in the Town Centre reduces the space available for housing. If there were more homes within the Centre, the area would become more vibrant and a big boost for the local economy.</td>
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</table>

Please note that I object to building on the GREENBELT.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/373</th>
<th>Respondent: 15136481 / Roy Padgett</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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</tbody>
</table>

I object to the 2016 draft local plan on the following grounds.

1. I object to the erosion of the green belt which once lost can never be replaced.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/910</th>
<th>Respondent: 15136513 / Ian Mitchell</th>
<th>Agent:</th>
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<tbody>
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1. I object to all erosion of the Green Belt
2. I object to any “in setting” (i.e. removal) of any villages from the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/118</th>
<th>Respondent: 15136513 / Ian Mitchell</th>
<th>Agent:</th>
</tr>
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<tr>
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</table>

I object removing Send Business Park from the Green Belt (4.3.15).
Send Business park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for it’s insetting (removal) from the Green Belt, and indeed GBC have not even attempted one. Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/9554</th>
<th>Respondent: 15136641 / Jason Dack</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
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</table>

I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/380</th>
<th>Respondent: 15136737 / D Padgett</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
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1. I object to the erosion of the green belt which once lost can never be replaced.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/385</th>
<th>Respondent: 15136897 / Victoria Grafton</th>
<th>Agent:</th>
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"I OBJECT TO BUILDING ON THE GREENBELT"

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/386</th>
<th>Respondent: 15136929 / Richard Davis</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
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</tr>
</tbody>
</table>
Policy P2. Removal of Send from Green Belt

I object to Send being removed from the Green Belt. The land proposed for removal from the Green Belt provides a buffer between Guildford and Woking. Without this buffer the village of Send will lose its village identity and merge with the conurbations of Guildford and Woking.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/387  Respondent: 15137057 / Ian Phillipson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I consider that the proposals in the plan will result in the eventual loss of the Green Belt to a housing sprawl with suburban London creeping further and further south. Once the Green Belt has been used for urban development, it is lost forever for future generations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/391  Respondent: 15137409 / Mark Costello  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I live nearby the area and listed below are my objections.

I object to the erosion of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/394  Respondent: 15137409 / Mark Costello  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the removal of green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/397  Respondent: 15137697 / Phil Goodman  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Please accept this email as recognition of my firm objection to the Draft Local Plan. My primary objection is the proposed removal of Send, Ripley and Clandon fro the Green Belt. Changing this status will have a reversible detrimental effect to these areas.

As a local resident, I have been on the receiving end of planning refusal from Guildford Borough Council on the grounds of green belt. Whilst this restricted what I want to do to my home, I understood that GBC were following a plan to protect the green belt, and I admired this.

The complete turnaround by GBC is hugely disappointing.

I feel the whole process has been managed appallingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/405  Respondent: 15137825 / Lianne Sherlock  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am a resident of Ripley [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] and I am deeply concerned about the proposal to build over 14,000 new homes many of which at Garlicks Arch, Wisley and Gosden Hill.

This will have a devastating impact on the community and the effective erosion of the Green Belt is simply scandalous.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/414  Respondent: 15137921 / Jean Sylvester  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I do not consider that any of the other proposed sites are viable and strongly object to the boundaries of our villages being enlarged and land within these boundaries being removed from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/416  Respondent: 15138049 / Mark Leonard  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I do not consider that any of the other proposed sites are viable and strongly object to the boundaries of our villages being enlarged and land within these boundaries being removed from the Green Belt.
I would like to strongly object to the 2016 draft local plan. I live in Ripley High street and over the last 4 years have already seen allot of change to what was a lovely village and this has already gone downhill with all the permitted development and the local plan will only make matters worse in my eyes.

I would like to object to many points as follows:

I object to all erosion of the greenbelt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to any in-setting, removal of any villages from the Green Belt, that’s what we have brought into and should remain in

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Loss of Green Belt land: Sadiq Khan, new Mayor of London, has instructed London planners not to approve development on Green Belt Land within the M25. If we continue to build on our countryside it won’t be many decades before we have none left. Creeping development has led to almost continuous housing from Central London to Effingham. Is this to carry on to Guildford and beyond? (1,700 houses are planned for the Guildford.
These targets will also have a material adverse impact on the Metropolitan Green Belt across this area, despite all the political promises made to the contrary.

Accordingly this local resident OBJECTS to the Proposed Submission Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/419  Respondent: 15138305 / A Cripps  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  
I object to all erosion of the green belt I object to removal of villages from the green belt  
What changes (2016)/further amendments (2017) do you suggest should be made to the document?  
Attached documents:

Comment ID: PSLPP16/427  Respondent: 15138849 / Anne Walters  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  
I object to all erosion of the green belt I object to the removal of any villages from the green belt  
What changes (2016)/further amendments (2017) do you suggest should be made to the document?  
Attached documents:

Comment ID: PSLPP16/9756  Respondent: 15140225 / Stephen Reed  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  
I OBJECT TO any/all erosion of the green belt  
I OBJECT to any 'in-setting' of any villages from the green belt  
What changes (2016)/further amendments (2017) do you suggest should be made to the document?  
Attached documents:

Comment ID: PSLPP16/9707  Respondent: 15140417 / Jeff Greenwood  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  
I OBJECT TO any/all erosion of the green belt  
I OBJECT to any 'in-setting' of any villages from the green belt  
What changes (2016)/further amendments (2017) do you suggest should be made to the document?
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/439</th>
<th>Respondent: 15140481 / Jayne Grant</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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</table>

| 1) I object to loss of the Green Belt |
| 2) I object to removal of villages from the Green Belt |

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/442</th>
<th>Respondent: 15140513 / Julie Wilkinson</th>
<th>Agent:</th>
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<tr>
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As a current resident in the local Ripley area I specifically object to the villages of Ripley, Send and Clandon being removed from the green belt. These locations are very special villages with a strong village atmosphere with many events and activities encouraging the villages to thrive as they do today. The fact they are in the green belt make them and keep them special. The planned increase in housing will encroach and destroy these small quintessential English villages which help retain British heritage.

We are already struggling to provide good quality education to our children locally and the increase in housing will only add to this pressure, not to mention the burden on local infrastructure.

This consultation has not been fair, with a limited consultation period and last minute changes with the inclusion of new sites.

Please reconsider your plans.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
As a current resident in the local Ripley area I specifically object to the villages of Ripley, Send and Clandon being removed from the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9729  **Respondent:** 15140641 / Sandra Greenwood  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to all erosion of the Green Belt

I object to any "in-setting" (ie removal) of any villeges from the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/450  **Respondent:** 15140705 / Simon Moxon  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing to object in the strongest possible terms your 2016 Local Draft Plan, especially the removal of Ripley and surrounding areas from the green belt which will be the absolute death of our village.

The main reasons from my objection are, but not limited to, the following:

1. Your consultation period has been minimal and not allowed enough time for people to fully take in the massive changes proposed.
2. The consultation document is nearly 2000 pages and is not designed for the layman to read and understand, probably deliberately.
3. There needs to be special circumstances to remove an area from the green belt and I do not believe your proposals satisfy/meet those circumstances.
4. I can see no proper provision for new schools, where will children be educated? All local schools are operating at or very close to capacity.
5. No provision for increased Doctor’s surgeries, waiting lists are long enough and these proposals will completely overwhelm any semblance of an efficient GP service. This will put peoples lives and general wellbeing at risk.
6. No provision for extra Policing in the area and, having retired from Surrey Police less than a month ago, I can assure you there is no plan to increase Police numbers to cover the proposed increase in the local population. Like every Force in the country Surrey Police are massively overstretched and suffering from recent government cuts to the Policing bill which will continue for the life of this parliament. This will put peoples safety at risk.
7. The disproportionate size of development sites in relation to the rural locations, in particular the Garlicks Arch proposal in Ripley. A development of this size will have a permanent and detrimental affect on our community for all the reasons listed above.
8. The local road network is already over capacity and the increase in traffic will gridlock Ripley village and surrounding areas especially during rush hours. Simply put, our roads were not designed for the amount of traffic now on our roads let alone what your plan proposes.
9. I suffer with a respiratory disorder made worse by heavy traffic pollution, your proposed plan and the increase in traffic will severely affect my breathing.
10. Ripley already has a massive shortage of parking for vehicles, the proposed plan will make the situation far worse.

I say no to the entire plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10867  Respondent: 15140705 / Simon Moxon  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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There needs to be special circumstances to remove an area from the green belt and I do not believe your proposals satisfy/meet those circumstances.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/454  Respondent: 15140801 / Penny Alison  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. GREEN BELT INFRINGEMENT. There are plenty of brownfield sites in this area and the wider borough without infringing upon the valuable green belt. The council should be doing its utmost to protect the green belt and not consider touching it until it becomes a last resort - and we are nowhere near that point in the foreseeable future.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9687  Respondent: 15140833 / Tim Whiting  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am concerned by The erosion of the green belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<thead>
<tr>
<th>Comment ID: PSLPP16/470</th>
<th>Respondent:</th>
<th>15141089 / Ian Holms</th>
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<td>We OBJECT to the limited consultation period</td>
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<tr>
<th>Comment ID: PSLPP16/471</th>
<th>Respondent:</th>
<th>15141281 / Robert Thompson</th>
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<tr>
<th>Comment ID: PSLPP16/474</th>
<th>Respondent:</th>
<th>15141409 / Barry Summerfield</th>
<th>Agent:</th>
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Section page number 1031 of 1782 Document page number 1032
With reference to the above plan I strongly object for the following reasons:

I object to all erosion of the green belt. I object to any "insetting." I object to the removal of any villages from the green belt.

Cc'd Sir Paul Beresford as our MP requesting he consider and invoke the conservative election mandate to "SAVE THE GREEN BELT."

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/477  Respondent: 15141409 / Barry Summerfield  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

With reference to the above plan I strongly object for the following reasons:

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Cc'd Sir Paul Beresford as our MP requesting he consider and invoke the conservative election mandate to "SAVE THE GREEN BELT."

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/479  Respondent: 15141633 / Bav Majithia  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to all erosion of the green belt.

I object to the removal of any villages from the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/482  Respondent: 15141761 / Louise Jelly  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Thank you for your standard letter and wanting to know our objections to this ridiculous application and all below should be considered, so here they are:-

This area is in Green Belt Land and should not be built on for homes or dwellings.
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/483</th>
<th>Respondent: 15141761 / Louise Jelly</th>
<th>Agent:</th>
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<td>Document:</td>
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<td>Finally the retention of this land in green belt is absolutely clear from petitions and letter support sent to Guildford Borough Council over so many years that the residents and locals do not want this development to take place.</td>
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<th>Comment ID: PSLPP16/486</th>
<th>Respondent: 15141793 / Paul Peters</th>
<th>Agent:</th>
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<td>Thank you for your standard letter and wanting to know our objections to this ridiculous application and all below should be considered, so here they are:-</td>
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<td>This area is in Green Belt Land and should not be built on for homes or dwellings.</td>
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<td>Finally the retention of this land in green belt is absolutely clear from petitions and letter support sent to Guildford Borough Council over so many years that the residents and locals do not want this development to take place.</td>
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<th>Comment ID: PSLPP16/489</th>
<th>Respondent: 15141953 / R Pomphrey</th>
<th>Agent:</th>
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<td>Document:</td>
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<tr>
<td>I object to all erosion of the GREEN BELT</td>
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<td>I object to the effective destruction of rural communities by over development</td>
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| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |
Comment ID: PSLPP16/495  Respondent: 15142977 / Paulina Adair  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the local development plans for the areas around Send, Ripley and Cladon.

We have only recently moved to the area and we chose Send especially for its relative peaceful location and natural beauty. The development plans you are proposing would change the area to the extent we will not want to stay living here.

I object to the proposal of removing the villages (Send, Ripley, Cladon) from the green belt. I understand this can only be done in the special circumstances which is not the case here. Please consider other areas which are not in the green belt and therefore better suited for the housing or the commercial development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/499  Respondent: 15143073 / Sharon Rankin  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to all erosion of the Green Belt I object to any "in-setting" of any villages from the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/503  Respondent: 15143265 / Steve Hartnell  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The proposals to remove significant areas of land from the Green Belt are wrong, The whole point of the Green Belt is to preserve open land, The boundaries should not be amended without very good reason and a potentially flawed housing need calculation is certainly not a good enough reason. I also note that the policy on which the Conservative party councillors were elected was that the Green Belt would be protected. To abandon this pledge would be undemocratic and dishonest.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/505  Respondent: 15143297 / Ronald Mounsey  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I wish to object to the 2016 draft local plan, and enter the following clear specific points as follows.

1. I OBJECT to ALL erosion of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
| Comment ID: PSLPP16/10862 | Respondent: 15143681 / Mark Clover | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |

I have studied the proposed Local Plan which Guildford Borough Council has now published for public opinion and my comments are set out in this email.

**I object to the lack of protection shown for the Green Belt.**
I understood the local plan stated it would protect the Green Belt, this submission proves the opposite. 65% of developments will be made on land that is currently Green Belt.
Green Belt should be appreciated, it's not just a view or a place to picnic, an escape from City life or even farmland, its a big part of English heritage and East/West Horsley's identity.
Further ramifications will be pollution from loss of green belt and added traffic and flooding from building on an area that is partially a level 3 flood risk already.

My wife and I moved back from London after university to start our family here and we believe it's important that this area of outstanding beauty is cherished or the future generations will not see the Green Belt benefits in the decades to come.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

| Comment ID: PSLPP16/516 | Respondent: 15143713 / Naomi James | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |

I strongly object to the removal of Send from the Green Belt, something that I thought the government had put on their manifesto to protect. As this is mainly a Conservative council I thought this is something that you would be looking to uphold. It seems I, like many other voters have been misled!

The Green Belt was established to limit this type of over development, and to remove it would merge Woking into Guildford. Once a field has been built upon it will never return to its original state, it will be lost forever!

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
The local plan stated it would protect the green belt and this isn't reflected in the proposal with 65% of developments made on current Green Belt land.

The loss of green belt and added traffic will cause pollution. Building on an area that is partially a level 3 flood risk will increase the likelihood of increased flooding which the drains cannot manage.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/519  Respondent: 15143809 / Cathy Leblanc  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the loss of Green Belt.
Not only will the added cars create more pollution but the loss of green belt land will only accelerate this problem. This land is important for our wider environment which reduces the effect of heat generated by cities. The land is a flooding area and in the past the drains haven't coped with heavy rainfall, building on that area will only further the problem. Building 65% of developments on Green Belt land is a direct contradiction to the local plan statements to protect the Green Belt and this proposal further highlights the little notice it's taken from previous comments in this community.

People who live here, live here because it is a protected Green Belt area of outstanding beauty. The negatives of this proposal outweigh the positives, this plan severely tampers with the identity of East and West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/520  Respondent: 15143841 / Colin Taylor  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Although I do not live in Guildford I am a regular visitor and know the Ripley, Send area well.

I cannot believe that planners intend to take Ripley, Send and Clandon out of the Green belt. What is the point of a Green Belt if you take out of it those areas which separate Greater London from the Surrey countryside? There was huge concern when the house at Clandon was burnt to the ground, but this proposal is many times more damaging to the future of the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/527  Respondent: 15143937 / Helen Strudwick  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I am writing with reference to the final draft local plan and would like to raise my objections.

With reference to the policies P2, A42, A43, A43a and A44 I object for the following reasons.

Policy P2 - Send is a small village community on the edge of Woking and it provides a buffer between the town and the open countryside. To remove Send from the Greenbelt is a short-sighted act of lunacy. Greenbelt is designed to provide protection from urban sprawl and to erode it in this way is irresponsible and indeed there were repeated specific election promises to protect it.

We are all custodians of our countryside and it needs protecting from reckless planners for future generations.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp171/1582  **Respondent:** 15143937 / Helen Strudwick  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the proposal to inset Send Business Park from the Green Belt. This will allow future sprawling development over which we will have no control. We are all custodians of our countryside and we need to protect it for future generations. To allow this to happen will create the opportunity for future expansion or development at this location without consultation.

The housing demand number in the Local Plan has dropped by 39 houses per annum from 2018 to 2034, and despite this, Send’s contribution has been increased without any justification. Major sites in Send and Ripley have been changed 3 times; first we had Burnt Common, then Garlick’s Arch and now we have both. Guildford Borough Council appear to have a predetermined agenda to build on the Green Belt and without any constraints to take into account the lack of infrastructure such as roads, schools and medical facilities as required by law.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/530  **Respondent:** 15144065 / Margaret Heard  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

I wish to lodge my strong objection to the Draft local plan.

The Councils disregard for the Protection of the Green Belt is of great concern.

The proposed removal of the villages from the green belt, will potentially allow disproportionate housing developments to be built.

As a Surrey resident for 35 years, I feel that the threat to Surrey and the villages surrounding Guildford has never been greater, do not destroy our heritage, and that of future generations by allowing the destruction of Surreys Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Comment ID: PSLPP16/1782  Respondent: 15144065 / Margaret Heard  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the removal of Ripley, Send and Clandon from the green belt. These areas have no reason to be removed from the green belt, other than to facilitate the unreasonable developments planned. Likewise the proposed (A35) Wisley airfield and (A43) Garlicks arch sites should not be removed from the green belt. These areas should remain protected from the ridiculous submitted 'local plan' policy P2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/535  Respondent: 15144161 / Karen Patterson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I moved back to the area seven years ago after living in London and Hertfordshire and choose a village location due to easy access to the countryside. If I wanted to live in a built up area I would have bought a house in Guildford. We are surrounded by beautiful countryside, wildlife and great walks. I am writing to make my objections to proposed Garlick’s Arch and removal of the green belt.

I OBJECT to the removal of 15 villages, including Ripley and Send, from the green belt. This will lead to wholesale, and often inappropriate developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/543  Respondent: 15144225 / Donald Pitts  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing to raise a number of objections to the Guildford Borough Proposed Submission Local Plan (strategy and sites 2016):

1. I object to the lack of protection being given to the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/547  Respondent: 15144545 / Stacey Maxwell  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I have the following objections to removing Ripley, Send and Clandon from the Green Belt:

1. **Green Belt**
   I STRONGLY OBJECT to the proposal to remove Ripley, Send and Clandon from the Green Belt. These are historic villages and there is no sound reason to do this. I bought a house in Ripley as it’s a lovely village and it’s utterly heartbreaking to see that planning departments are even contemplating removing these villages from the Green Belt. If this decision moves forward, the Green Belt will be gone forever.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/9550  **Respondent:** 15144545 / Stacey Maxwell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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<tr>
<td>I object to the removal of villages from the Green Belt.</td>
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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/559  **Respondent:** 15144577 / David Johnson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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<tr>
<td>I am writing to object to the Local Plan 2016-06-18 and would like my comments to be seen by the Inspector. It would appear that far from looking after the Rate payers interests Guildford Borough Council would override our interests and previous comments and objections.</td>
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<td>I Object to the way the council have changed the plans for Send after the original plan was put forward.</td>
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<td>I Object also to the various villages being removed from the Green Belt, in particular Send Village policy P2</td>
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<td>I Object to the massive development of Garlicks Arch Burnt Common, this is another development just slipped in without the necessary consultation. The local roads in this area are already blocked during the morning and afternoon rush hour periods as they were not built to cope with this volume of traffic already using them. Apart from a major junction at Burnt Common, there does not appear to be any further plans for improvement to the roads in this area. The A3 is already grid locked to both North and South daily.</td>
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<tr>
<td>I Object because no one seems to have considered how much water and sewage will be used and generated by the properties proposed for this whole area including Ripley, Send, Wisley and Clandon. Just how are these new households and businesses to be served? What about Policing, Fire and Ambulance services on top of which the Dr surgery is already struggling as is The Royal Surrey Hospital. In summery I strongly object to the 2016 Draft Plan.</td>
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I Object to any invasion of The Green Belt.

I Object to any setting of any villages from the Green Belt.

I Object to the massive amount of development in this one area of the Borough.

I Object to the incredible limited consultation period.

I Object to the last minute inclusion of new sites with less than two weeks notice.

I Object to the total lack of any evidence for the alleged housing need numbers.

I Object to the lack of immediate provision for new schools.

I Object to the lack of creditable provision for Dr's surgeries.

I Object to the proposal to build 40 homes and 2 travellers pitches on the land West of Winds Ridge and Send Hill. This site is new and was not included in the regulation 18 Draft and has not been consulted upon previously. Development for housing is inappropriate due to its narrow entrance, Green Belt status, and high quality Green belt amenity within an area of beautiful countryside which would be ruined by development. The sub soil of this existing site contains documented unsafe land fill which is currently vented and should never be disturbed as nature has sealed the site it must be left undisturbed. The proposal to include two travellers' sites is inappropriate due to the existing narrow single track lane which provides insufficient access to the site or even access to Potters Lane. In fact residents at this point are woken up in the early hours by delivery lorries which get stuck due to wrong instructions from sat navs having to reverse back up Send Hill with warning sirens and flashing lights. There is also a school at the bottom of the hill with the attendant traffic when mothers deliver and collect their children. Policy 44-1.9na.

It is disgraceful that in spite of all the promises you made at election time, you now seem to totally disregard our views and seem intent on breaking down our village communities and destroying the community spirit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
### Comment ID: PSLPP16/560  Respondent: 15144737 / L M Wells  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

As a resident of Normandy for approx. 25 years we chose to live in a village. Over those years we have observed traffic increase enormously. Our road system just about copes the ref ore to increase the number of houses by 1100 which is your proposal doubles the size of Normandy which the current road & sewage system could not cope with. Normandy elevates from South to North at quite a steep gradient causing flooding to occur regularly on the North boundary at times closing Glaziers lane for fear of stalling in deep water, sewage has been a major problem for several properties in there gardens. To propose such an enormous development is totally unacceptable & will deprive future generation of any green belt to walk in & breath air not polluted by vehicles Therefore I am lodging a strong objection

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

### Comment ID: PSLPP16/567  Respondent: 15144929 / Michael Simpson  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

My name is Michael Simpson and I live at [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998].

I have objections to the local plan and I want the Planning Inspector to be seen by the inspector.

I object to the local plan policy P2 proposal to remove Send village from the green belt. At this rate the next generation won’t know what a village is, or what the green belt is.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

### Comment ID: PSLPP16/583  Respondent: 15145249 / Colin Wells  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I understand that a large redevelopment around the village of Send and the alteration of the existing Green Belt arrangements at Send and Burnt Common are being proposed in the Local Draft Plan.

I wish to strongly object to the changes to the Green Belt that would remove areas around the village of Send from the designation of "Green Belt". The whole idea of having a green belt is to permanently protect rural areas from development and to prevent towns and cities expanding into agricultural land and areas of natural beauty. There is a real danger that
this leads to the joining together several villages to form a sprawling area that in turn joins to Guildford or Woking ( or both ).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attended documents:

Policy P2: Green Belt

5.15 We agree that the Metropolitan Green Belt should be protected against inappropriate development in accordance with national planning policy to maintain its openness and open character. We consider that the land at Onslow Park should however, be excluded from the Green Belt as shown on the proposals map in accordance with the boundary identified in these representations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attended documents:

Comment ID: PSLPP16/18699  Respondent: 15145377 / WYG (S Fidgett)  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the changes in Green Belt Policy 2 at paragraph 4.3.15 because :-

Further expansion and development at this location would detract from the openness of the Green Belt and once lost it can never be recovered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attended documents:

Comment ID: pslp171/98  Respondent: 15146049 / Ian Tulloch  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. **Lack of protection for the Green Belt and the Historic Environment.** I object to the plan Ripley to be taken out of the Green Belt and designated as a “District Centre”. Further, the boundary for the Primary Shopping Area is to be contiguous with the the boundary of Ripley itself, opening the door to commercial development outside of the High Street. This this is being done without any prior consultation and without following proper procedure, which is unacceptable. It does not consider the current paucity of parking, yet proposes to add to the burden. It also increases the traffic burden on the interchange with Newark lane and Rose Lane in the village centre, identified choke points. It also threatens to change the nature of Ripley as an Historic Environment...
whose important presence on the Portsmouth Road has resulted in a significant number of Listed properties on
the High Street and wider. It would be more suitable to designate Ripley as a rural Local Centre and to protect
its heritage nature. I also understand that the previous plan for the Burnt Common site which was allocated for
light industrial, general industrial and warehousing and 100 houses has been replaced with a new proposal,
Garlick's Arch. This includes increased light and general industrial units and 400 houses, as well as a new 4 way
on/off junction for the A3 to support Gosden Hill and Wisley Airfield as well as developments in the East of the
borough. The site that is earmarked for this development has permanent green belt protection. There is no
proven need for additional housing or industrial development in this area and contributes to an entirely
disproportionate building burden on this area. The open character of Ockham with its Commons and RHS
Wisley, Ripley with its historic Village Green and the Wey navigations, and Send Marsh, all make important
contributions to the Green Belt and should be included rather than being inset. I strongly disagree that
exceptional circumstances exist to justify the amendment of the Green Belt boundaries in this area against
national planning policy. On the contrary, the development of the sites at Garlicks Arch and Gosden Hill Farm,
combined with proposed limited infilling in West Clandon would result in the coalescence of urban sprawl from
Guildford all the way to the M25.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/607  Respondent: 15146817 / Sue B  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

I strongly object to the 2016 draft local plan.
Specifically:-
I object to the in-setting of Ripley, Send, Clandon and Wisley from the Green Belt.
I object to any erosion of the Green Belt in Surrey.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/609  Respondent: 15146913 / Nicola Barber  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

1. Lack of protection for the Green Belt and the Historic Environment. I object to the plan for Ripley to be
taken out of the Green Belt and designated as a “District Centre”. Further, the boundary for the Primary
Shopping Area is to be contiguous with the boundary of Ripley itself, opening the door to commercial
development outside of the High Street. This this is being done without any prior consultation and without
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Environment whose important presence on the Portsmouth Road has resulted in a significant number of Listed
properties on the High Street and wider. It would be more suitable to designate Ripley as a rural Local Centre
and to protect its heritage nature. I also understand that the previous plan for the Burnt Common site which was
allocated for light industrial, general industrial and warehousing and 100 houses has been replaced with a new proposal, Garlick's Arch. This includes increased light and general industrial units and 400 houses, as well as a new 4 way on/off junction for the A3 to support Gosden Hill and Wisley Airfield as well as developments in the East of the borough. The site that is earmarked for this development has permanent green belt protection. There is no proven need for additional housing or industrial development in this area and contributes to an entirely disproportionate building burden on this area. The open character of Ockham with its Commons and RHS Wisley, Ripley with its historic Village Green and the Wey navigations, and Send Marsh, all make important contributions to the Green Belt and should be included rather than being inset. I strongly disagree that exceptional circumstances exist to justify the amendment of the Green Belt boundaries in this area against national planning policy. On the contrary, the development of the sites at Garlick's Arch and Gosden Hill Farm, combined with proposed limited infilling in West Clandon would result in the coalescence of urban sprawl from Guildford all the way to the M25.

We keep hearing that your Borough Council is listening to your residents of Send or Ripley. But in spite of the enormous response to the last Local Plan, now even more houses and development are being planned encroaching on the Green Belt which the Conservatives pledged to save. Now we have new proposals to build a 4 way junction at Garlick's Arch.

** I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.
I have the following comments:

- I object to Send being removed the GreenBelt. Send is a small village that cannot take any more housing, the infrastructure & road systems are barely suitable for the current number of people and definitely cannot support more housing. I particularly object to the land between the 2 schools, including their playfields being taken out of the greenbelt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/652  Respondent: 15150433 / Alex Richardson  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I write with reference to the proposed development on Green Belt Land of 400 houses and an industrial site at Garlicks Arch – Burnt Common Send Ripley Borders which has been drafted into the Guildford Local Plan 2016. I would like to register my objection to this proposed development for the following reasons:

1) Erosion of the Green Belt –

   I strongly object to proposed wholesale destruction of the Green Belt, which is in clear contravention of the central governments stated commitment for “Green Belt Protection”. Once this area is developed not only will this part of the Green Belt be eroded, but it will set a precedent for future development and erosion of the green belt – not only in Send/ Ripley and Clandon villages but on other green belt sites within Guildford & surrounding areas. The Green Belt should and must be protected, and whilst I appreciate the need for more housing in Guildford, there are plenty of brownfield sites which can be redeveloped. Also, it is alarming that not only is housing proposed on the greenbelt, but also an industrial site – which will have a huge & negative impact on the surrounding environment e.g. pollution, long term damage to the surrounding countryside and the flora/fauna within this area, not to mention the negative effect on communities currently living in these areas.
Furthermore, I also object to the proposed removal, through “in-setting”, of several villages from the Green Belt (e.g. Send, Ripley, Send, Clandon and Wisley to name a few).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attended documents:

Comment ID: PSLPP16/657  Respondent: 15150593 / Janna McClean  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Planning Policy Committee.

I am writing to strongly object to the proposed 2016 draft plan for the following reasons.

1. The erosion of the green belt, which directly goes against Conservative policy. 2. Any insetting of any villages in the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attended documents:

Comment ID: PSLPP16/3554  Respondent: 15150817 / Robert Winborn  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

8) I OBJECT TO the removal of any villages from the Green Belt i.e in-setting. When will this stop, will have no green spaces left.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attended documents:

Comment ID: PSLPP16/669  Respondent: 15151009 / G Stonehouse  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. Green Belt

2.1. Proposed Submission Local Plan includes the statement “We will continue to protect the Metropolitan Green Belt”. No this is not the case. The housing policies set out in the Proposed Submission Local Plan; indicate that 65% of proposed new developments will take place on land that is currently in the Green Belt.

2.2. Under NPPF regulations GBC and other Local Authorities are permitted, once they have determined their Objectively Assessed housing Need (OAN), to make allowance for factors which may constrain the delivery of new housing. Constraints such as the need to protect the Metropolitan Green Belt, or the restrictions required to protect the
Surrey Hills Area of Outstanding Natural Beauty, or land costs etc. Although these designated areas make up a large proportion of the land area of Guildford Borough, GBC has made no attempt to reduce its housing numbers in order to take account of such constraints. They have instead increased the number, beyond that required for normal growth projections to satisfy their own egotistical view on a path of massive economic growth.

2.3. Currently development is permitted within the settlement boundary, where villages are washed over by the green belt with particular planning regimes being applicable that have proved beneficial in preventing the urbanization of many villages. They are very successful, because of the non urban nature of small scale new development to help to retain the openness of the villages. These villages house, in some cases, a population of 4000 plus people, yet are regarded by residents as small villages. For those who drive through these areas they do not see a mass of urban style developments but trees and hedges, views between homes, views through spaces that don't reveal row upon row of homes but space and openness with trees amongst the homes and a variety of scale and architecture.

2.4. Washing some of the larger villages will result in them becoming their own urban sprawl as a result of disproportionate infilling.

2.5. Changes to settlement boundaries have been made in order to make more land available for the developers under the guise of making the boundaries more defensible. Many straight lines have now been drawn which result in villages developing hard edge profiles with buildings replacing the fragmented softer edge of the original hedgerows, trees and green fields.

2.6. Loss of Green Belt resulting from these boundary realignments can only be justified in exceptional circumstance. None of which have been provided. Moving a boundary from one already defined boundary to another, again can only be done in exceptional circumstance. Housing need has already been turned down as such an exceptional circumstance.

2.7. I object to all these changes being made to the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/683  Respondent: 15153697 / Zena Singer  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object most strongly to the Horsley villages being taken out of the Green Belt. Many promises have been made to preserve the Green Belt and it should be. It is a rural area and the character of the villages should be maintained.

The Horsley villages have already, during the last few years, had considerable infilling and large areas of new houses built resulting in considerable congestion on the narrow roads, particularly at peak times. It is already almost impossible to park to shop in the village, and the overflow car park is constantly full.

The station car park is also nearly full now, and with the additional houses planned commuters would not be able to park there.

The filter roads off the A3 already have huge tailbacks at peak times.

The proposed number of houses to be built would mean a huge strain on the infrastructure, and cause a different way of life for the residents who do not want this. The further possibility of development at Wisley airfield is a complete horror as it would ruin the areas of outstanding natural beauty all around it.

Please reconsider the Local Plan.
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/695</th>
<th>Respondent: 15154593 / Linda Davis</th>
<th>Agent:</th>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</th>
<th>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</th>
</tr>
</thead>
<tbody>
<tr>
<td>I object to Send being removed from the Green Belt. The land proposed for removal from the Green Belt provides a buffer between Guildford and Woking. Without this buffer the village of Send will lose its village identity and merge with the conurbations of Guildford and Woking. GBC refer to the Green Belt as one of the borough’s biggest assets so this proposal is not designed to protect and enhance this area at all. Removal of Send and neighbouring villages from the Green belt opens up possibilities for further developments off the A3 which would be detrimental to and destroy this beautiful countryside. Guildford would lose its identity and become a sprawling area extending all the way northwards to the M25 junction.</td>
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<tr>
<th>Comment ID: PSLPP16/693</th>
<th>Respondent: 15154625 / Jacky Sutton</th>
<th>Agent:</th>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</th>
<th>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</th>
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<tbody>
<tr>
<td>I object to all erosion of the green Belt...</td>
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<tr>
<td>I object to any 'in-setting' of any villages from the Green Belt...</td>
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<tr>
<th>Comment ID: PSLPP16/701</th>
<th>Respondent: 15154849 / Julia Laing</th>
<th>Agent:</th>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</th>
<th>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</th>
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<tbody>
<tr>
<td>1. I object to the irreversible damage building new homes on woodland and farmland will create. A combination of brown field sites (burnt common) and small infill sites (Anderton's Farm) are available but have not been considered by the plan.</td>
<td></td>
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</tr>
<tr>
<td>1. I object to removing villages around Guildford (such as Ripley, Send and Clandon) from the green belt. Villages will be permanently damaged by uncontrolled development. I do not want these villages to become an extension of Greater London via spreading urbanisation. Villages are the culture and heritage of our country.</td>
<td></td>
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<td></td>
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</tr>
</tbody>
</table>
1. I object to the irreversible damage building new homes on woodland and farmland will create. A combination of brown field sites (burnt common) and small infill sites (Anderton's Farm) are available but have not been considered by the plan.

2. I object to removing villages around Guildford (such as Ripley, Send and Clandon) from the green belt. Villages will be permanently damaged by uncontrolled development. I do not want these villages to become an extension of Greater London via spreading urbanisation. Villages are the culture and heritage of our country.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to not protecting the Green Belt (Policy P2)

I object to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/18663  Respondent: 15156673 / Emma France  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy P2 - Send should not be removed from the Greenbelt. Send provides a buffer between Woking and Guildford. The particularly vulnerable areas of land being taken out of the Green Belt include: 1 - the land behind the school including playing fields and woodland. 2 - the land to the right of Cartbridge by the River Wey Navigation up to the new boundary fence with Vision Engineering. 3 - Land to the left of Cartbridge going up to the old depot on the Wey Navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/767  Respondent: 15157409 / Melanie Sykes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I would like my opposition to the proposed plans to be noted for the following sites:

Waterloo Farm
Manor Farm
The Horsley Main site
Ockham Road North
East Lane
Thatcher's Hotel

I strongly disagree with encroaching on green belt land by extending the borders of our village.

The green belt is a policy for controlling urban growth and to assist in safeguarding the countryside from encroachment. (National Planning Policy Framework (NPPF) March 2012).

Should you ignore this, I along with other residents would consider legal action.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/769  Respondent: 15157505 / Linda Leunissen  Agent:
1. I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy. The green belt is what makes these villages attractive to live in in the first place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to removing villages around Guildford (such as Ripley, Send and Clandon) from the green belt. Villages will be permanently damaged by uncontrolled development. I do not want these villages to become an extension of Greater London via spreading urbanisation. Villages are the culture and heritage of our country.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/798  Respondent: 15159873 / Martin Smith  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Yesterday morning I cycled out from Ripley on my bicycle enjoying the beautiful green countryside that has been preserved for us by previous generations.

In my opinion it is exceptionally sad that the removal of the green belt status has been proposed.

Removal of the green belt and the subsequent urbanisation of our villages and countryside is a one way decision. Once destroyed he countryside is gone forever.

In principal I am not against the development of new homes but it feels like the removal of the green belt and the disproportionate amount of proposed development is being made without any consideration of the infrastructure in our local area.

This week it took me an hour to drive from Ripley into Guildford, it took my wife an hour to drive from Weybridge to Cobham, parents cannot get their children into local schools, it can take 2 weeks to see your GP and the Royal Surrey hospital is at breaking point. Rush hour trains from Guildford and Woking to London are amongst the most overcrowded in the United Kingdom. Is the solution to this really to build the proposed quantity of new homes?

Specifically

1. I OBJECT TO ALL EROSION OF THE GREEN BELT

1. I OBJECT TO ALL "IN SETTING" OF ANY VILLAGES FROM THE GREEN BELT

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17366  Respondent: 15159873 / Martin Smith  Agent: Vail Williams LLP (Jane Terry)
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The spatial vision of the draft Local Plan seeks to maintain the extent and function of the Green Belt in order to protect the character of the Borough. However, paragraph 4.3.16 recognises that there are exceptional circumstances to justify the amendment of Green Belt boundaries in order to facilitate the development that is needed and promote sustainable patterns of development. Paragraph 4.3.17 notes that land has been removed from the Green Belt in order to enable development around selected villages. In accordance with the conclusions of the Green Belt and Countryside Study Volume IV Insetting of Villages, Normandy and Flexford have become inset from the Green Belt (paragraph 4.3.13). These changes to the Plan are supported.
Nevertheless, the strategic development proposed at Normandy/Flexford does not go far enough. In relation to Normandy, Volume IV of the Green Belt Study: Insetting concludes that the village be inset within the Green Belt. This conclusion was based on a number of factors including:

- The high and medium density and distribution of residential development located on A323 Guildford Road, Anchor Close and Walden Close;
- The intermittent visual connections between the village and the wider Green Belt with the exception of Normandy Community Centre playing fields; and
- The presence of recognisable and defensible boundaries including the A323 Guildford Road, woodland at Normandy Common, Anchor Copse, hedgerows to the north of playing fields at Normandy Community Centre, and surrounding Glazier’s Lane, Mariner’s Close, Wyke Churchyard and Walden Cottages.

Similarly, the Study concluded that Flexford to the south of the railway line should also be inset based on:

- The difference in open character to the north and south of the railway line, with high density development and enclosure more evident to south of the railway line in comparison to the north;
- The high density residential development located on Christmas Pie Avenue, Orchard Way, Cull’s Road, Flexford Road and Westwood Lane to the south of the railway line; and
- The presence of recognisable and defensible boundaries to the south of the railway line including tree belts to the east of The Paddocks, Crossways and Flexford Road, the hedgerows and newly planted woodland to the south of Flexford Road, and fence lines, hedgerows and tree belts to the west of Westwood Lane. A significant amount of existing development already lies to the west of Westwood Lane and will relate to the proposed strategic development allocation.

These conclusions were based on a very limited perceived extent of the village area and by no means included all existing development which clearly does form part of each wider village as it is on the ground. For instance a significant amount of built form exists to the west of Westwood Lane and at Wyke. The summary conclusions against each of these villages also makes reference to their relationship with the proposed strategic development allocation (Policy A46) which will further emphasise their physical and functional integration.

Consequently it is considered that land to the west of Westwood Lane albeit assessed within a different Land parcel, clearly relates to the SDA and should be included within it and / or the insetting of Normandy and Flexford.

To reinforce this, it is considered that the land in question does not contribute to any of the five purposes of a Green Belt:

- To check the unrestricted sprawl of large built-up areas. The Plan seeks to deliver development for the needs of the Borough for the next 20 years. Accordingly it has the ability to contain further growth to the areas identified within the Plan. There is no need for a subsequent layer of restriction imposed by Green Belt designation;
- To prevent neighbouring towns merging into one another. There is a significant separation between Normandy/ Flexford and development of and significance at Ash to the west and the level of development envisaged to the west of Westwood Lane would not in anyway merge the two areas.
- To assist in safeguarding the countryside from encroachment. As above, there is no necessity for further safeguards in this area;
- To preserve the setting and special character of historic towns. No special character has been identified at Normandy or Flexford which would be impacted by additional development to the west of Westwood Lane; and
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land. That there is insufficient derelict and other urban land available to meet the needs of the Borough is recognised through the draft Plan through the relaxation of Green Belt boundaries in locations such as Normandy/Flexford.

The area is generally unconstrained and, being adjacent to the proposed strategic development area, will contribute to the planned comprehensive and integrated development in a sustainable way.

In conclusion it is considered appropriate for land to the west of Westwood Lane to be incorporated within the inset area around the SDA at Normandy / Flexford.

Further changes should be made to the Green Belt designation in the vicinity of Policy A46 with the incorporation of land to the west of Westwood Lane between the railway line to the south and the A323 Guildford Road to the north. The extent of this area is indicated on the attached plan.
In order that sufficient land is made available at the proposed Potential Development Area at Normandy / Flexford to ensure a sustainable and inclusive community and to ensure that sufficient land is made available to deliver objectively assessed housing needs across the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/801  Respondent: 15159905 / Vicky Smith  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

In my opinion it is exceptionally sad that the removal of the green belt status has been proposed.

Removal of the green belt and the subsequent urbanisation of our villages and countryside is a one way decision. Once destroyed he countryside is gone forever.

In principal I am not against the development of new homes but it feels like the removal of the green belt and the disproportionate amount of proposed development is being made without any consideration of the infrastructure in our local area.

This week it took my husband an hour to drive from Ripley into Guildford, it took me an hour to drive from Weybridge to Cobham, parents cannot get their children into local schools, it can take 2 weeks to see your GP and the Royal Surrey hospital is at breaking point. Rush hour trains from Guildford and Woking to London are amongst the most overcrowded in the United Kingdom. Is the solution to this really to build the proposed quantity of new homes?

Specifically

1. I OBJECT TO ALL EROSION OF THE GREEN BELT

1. I OBJECT TO ALL "IN SETTING" OF ANY VILLAGES FROM THE GREEN BELT

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/809  Respondent: 15160769 / Elliott Stuart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to West Horsley, and all the other local villages, being removed from the Green Belt- this is being done just so that you can then allow increased development which is not wanted by local people. There are lots of other areas (like the old Wisley Airfield) which could be developed upon and which have good links to the bigger roads which could and should be used first.

Removal of villages from the Green Belt allowing increased development into the future;

The proposed erosion of the Green Belt in any way, shape or form;

The really short time frame for consultation of the Draft Local Plan;
The council ignoring the many suitable brownfield sites within the borough which could be used for future development;

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/811</th>
<th>Respondent: 15164033 / Michael Blowfield</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
</tr>
</tbody>
</table>

I object strongly to any 'plan' to build on the green belt. I ask you the question. What makes Guildford a reasonably pleasant place to live? Answer, in my opinion is the green belt. Once that goes there is nothing left, and a total reduction in quality of life with all the associated problems that come with such high density housing, schools, hospitals, pollution etc. In my opinion this is environmental vandalism straight out the top drawer.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/867</th>
<th>Respondent: 15172641 / Michael Heard</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
</tr>
</tbody>
</table>

I wish to lodge my strong objection to the Draft local plans.

The *Council's disregard for the Protection of the Green Belt* is of great concern to me.

The proposed removal of the villages from the green belt, will potentially allow disproportionate housing developments to be built.

These large developments bring with them a huge demand on already stretched local resources, overloading schools, health services and transport systems.

The already overcrowded roads, will potentially see thousands of additional cars and commercial vehicles flood into the villages, where the lanes were never designed to accommodate them.

This brings with it the problem of pollution, which is a particular problem for the young and elderly.
I have regularly been dismayed to discover that these developments with the promise of ‘affordable housing’ are far from ‘affordable’

with very little chance of young families, or local people being able to afford them.

As a Surrey resident for 33 years, I feel that the threat to Surrey and the villages surrounding Guildford has never been greater,

do not destroy our heritage, and that of future generations by allowing the destruction of Surreys Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15535  Respondent: 15172641 / Michael Heard  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object most strongly to the proposal to remove Ripley Send and Clandon from the Green Belt.

There are Brownfield sites that could be utilised, ie at Burnt Common, before considering Green Belt development at Garlicks Arch and Wisley Airfield.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/870  Respondent: 15172865 / Pete Bonner  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

GUILDFORD PROPOSED LOCAL PLAN 6/6/2016

FIELDS BEHIND SHALFORD VILLAGE HALL

Although a resident of Dunsfold but a member of Shalford LTC I wish to make known my objections to the current version of the local plan which removes the fields behind the Village Hall and Tennis Club from the Green Belt and puts them in the Shalford settlement boundary.

Although these fields have been classified as “open spaces” there is no confirmation to say that this would give them the same degree of protection as the Green Belt from housing development.

Any Construction on these fields which is 25ft above the village hall would tower over the tennis courts and bowling green and totally destroy the Green aspect of the village.

The considerable traffic from a development would have to exit on Chinthurst lane not only adding to the traffic chaos and pollution but increasing the potential for an accident.
By implementing a small adjustment back to the 2003 boundary GBC could protect these fields and ensure they remain open spaces.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1058  **Respondent:** 15174145 / Kathleen Mylet  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object very strongly to Guildford Borough Council's Local Plan dated June 2016.

Below are detailed my objections to policies within the Plan.

1) I object to removing Send, Ripley and Clandon from the Green Belt.(P2)

There are no unusual circumstances for these villages being removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1063  **Respondent:** 15174145 / Kathleen Mylet  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

13) I object to the erosion of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/886  **Respondent:** 15175873 / Jessica McCluskey  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Just writing to object to the planned building on greenbelt land. Our green belt land is precious, and one of the things that makes Surrey so special and should not be destroyed. Especially when there is not the road infrastructure to deal with the extra traffic to the town

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/888  **Respondent:** 15176001 / Lynda Skeldon  **Agent:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Please note my objection to housing on the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/890  Respondent: 15176161 / Linda Fielding  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to all erosion of the Green Belt.

I object to any in-setting of any villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1525  Respondent: 15177505 / Iain Guest  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( Yes ), is Legally Compliant? ( Yes )

I agree the policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1526  Respondent: 15177537 / Elizabeth Guest  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

Although Guildford Borough Council states they will protect the Metropolitan Green Belt which I fully support they then go on to show through analysis in the Appendix that c65% of the development proposed in the Proposed Submission Local Plan are to be built on land currently within the Metropolitan Green Belt. This would lead to the devastation of our beautiful and historic village one being East & West Horsley where over 500 house are proposed on the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/914</th>
<th><strong>Respondent:</strong> 15178113 / Jack Hornblow</th>
<th><strong>Agent:</strong></th>
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</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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<tr>
<td>1) all erosion of green belt</td>
<td>2) removal of villages from the green belt</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td>Attached documents:</td>
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<tr>
<th>Comment ID: PSLPP16/1191</th>
<th><strong>Respondent:</strong> 15180193 / Paul Bedworth</th>
<th><strong>Agent:</strong></th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), <strong>is Sound?</strong> ( ), <strong>is Legally Compliant?</strong> ( )</td>
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<tr>
<td>5.) I object to the villages of Send, Ripley and Clandon being removed from the Green Belt. Send provides a buffer between Guildford and Woking. None of these villages should be “inset”. The better use of Brownfield sites must be fully explored and exploited.</td>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td>Attached documents:</td>
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<tr>
<th>Comment ID: PSLPP16/935</th>
<th><strong>Respondent:</strong> 15180929 / Torkil Fredborg</th>
<th><strong>Agent:</strong></th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( <strong>Yes</strong> ), <strong>is Sound?</strong> ( <strong>Yes</strong> ), <strong>is Legally Compliant?</strong> ( <strong>Yes</strong> )</td>
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<tr>
<td>I fully agree that the historic development in the green belt need to be recognised and that while maintaining the intent of the green belt, already developed areas and urban areas can be excluded in order to enable growth in development. New development can and should be planned in such a way as to not hinder access to the open country site, but the villages now designated as inset areas must be open for new development in order to take the pressure off Guildford Town Centre.</td>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td>Attached documents:</td>
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<tr>
<th>Comment ID: PSLPP16/939</th>
<th><strong>Respondent:</strong> 15183393 / D Greenman</th>
<th><strong>Agent:</strong></th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), <strong>is Sound?</strong> ( ), <strong>is Legally Compliant?</strong> ( )</td>
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<td>Once again Guildford Borough Council are ignoring green belt regulations for Send.</td>
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The Conservative Party at the last election promised voters to protect Green Belt land. The current Government and GBC are not fulfilling their promises.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/625  Respondent: 15183393 / D Greenman  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Green Belt - Policy 2 at paragraph 4.3.15
The proposal that Send Business Park be taken out of the Green Belt goes against everything that has been refused for this site in the past. It would be far better to allow the existing building to be converted into luxury apartments, that would easily sell in this area of outstanding natural beauty adjacent to the Wey Navigation. It would eliminate the need for heavy lorries to use Tannery Lane that has restricted vehicular access. There is no need for development of the old Tannery building, it is hardly a Business Park and should not be used for industrial purposes. The addition of 460 homes in the village with potential to increase the population by 1,150 (assuming 2 people per house and 50% with one child) will put unbelievable pressure on local services, especially doctor's surgeries, schools and the police let alone local hospitals. These plans, policies and proposals are going to ruin the life of the residents, who decided to live in Send and Ripley for its rural areas and quiet way of life. This is now being threatened and the people of Send and Ripley will not stand for it.............. Stop this NOW - ENOUGH IS ENOUGH!!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/959  Respondent: 15184289 / V H Wood  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the proposals to remove the villages Ripley, Send and Clandon from the Green Belt. Together with sites of Wisley (A35) and Garlick's Arch (A43). National planning policy requires there to be an exceptional circumstances for the Green Belt boundaries to be altered . There are no exceptional circumstances for the villages and the land to be taken from the Green Belt.

I object to development in areas which are at risk of flooding (Policy P4).

The site at Garlick's Arch is identified on the Environment agency map on [text unreadable] a flood zone 3.

Knowing the area well I know that this site often floods.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/956  Respondent: 15184833 / Mark Coomber  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We are writing to confirm that we object to the proposed changes to move the green belt boundary to exclude the fields behind the Shalford Village Hall and to extend the village settlement boundary to include these fields.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/960  Respondent: 15185153 / Olivia Stuart  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I Object to the 2016 Local Draft Plan

I wish to record my strong objections to the Draft Local Plan which is out for public consultation currently.

I live in West Horsley and I am aged 16. My family moved to this area because we did not wish to live in an urban location (like Guildford itself) - we like the countryside with its open, green spaces. These are special places, with lots of amazing wildlife and interesting species. Areas like these must be protected for future generations.

We have learned at school about the Green Belt which I think should be protected from erosion by possible future disproportionate development - how can you identify new development sites and produce a whole plan without having a solid set of evidence as to what the future housing need actually is? No one has ever asked me whether I wish to buy a house within the villages surrounding Guildford when I am older.

I object to West Horsley, and all the other local villages , being removed from the Green Belt- this is being done just so that you can then allow increased development which is not wanted by local people. There are lots of other areas (like the old Wisley Airfield) which could be developed upon and which have good links to the bigger roads which could and should be used first.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1001  Respondent: 15185505 / Dominic Patterson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to this development due to its compounding impact on road safety, traffic and congestion and the threat to this protected green belt area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/965  Respondent: 15185537 / Peter Mills  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I strongly object to not protecting the Green Belt (Policy P2)

I very strongly object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). What are the exceptional circumstances for these villages and sites being removed? I believe National Planning Policy requires this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: pslp171/1613</th>
<th>Respondent: 15186273 / Suzannah Monk</th>
<th>Agent:</th>
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<tbody>
<tr>
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<td>Fourthly, I object to Policy 2 of the proposal to inset Send Business Park from the greenbelt because it there is limited vehicular access and development of this location detracts from the openness of the Greenbelt.</td>
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<th>Comment ID: PSLLP16/985</th>
<th>Respondent: 15186785 / Benjamin Lowe</th>
<th>Agent:</th>
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<tr>
<th>Comment ID: PSLLP16/986</th>
<th>Respondent: 15186817 / Katie Lowe</th>
<th>Agent:</th>
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<th>Comment ID: PSLPP16/1002</th>
<th>Respondent: 15188449 / Richard Harriss</th>
<th>Agent:</th>
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I have recently heard about the amendment to the local plan and the impact that this will have on Shalford village, and would like to state my objection.

I believe this amendment will significantly and irreversibly alter Shalford village to the detriment of this area - the character of the village will be completely lost.

The services cannot cope with additional housing. The local roads already suffer from severe congestion at key times of the day.

I believe there is no valid reason to wreck the village of Shalford in this manner.

I object to this proposed development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1003   Respondent: 15188513 / Michael Brenner   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing to object at the proposed changes to the Local Plan by Guildford Borough Council (GBC) to the fields behind the Shalford village hall.

The fields you are planning to develop contribute to the open character of the Shalford village and provide a rural backdrop - I believe that GBC should support the expressed views of over 700 local residents who signed the petition objecting to this development and retain this land within the Green Belt and keep them outside the village settlement boundary.

Due to their height, these fields contribute to the openness of the Green Belt and any development would tower over the village community facilities and surrounding areas - with very large developments already planned both sides of the village is it really worth spoiling the heart of Shalford by building on this virgin, totally undeveloped site?

I have already seen first hand in station road that previous developments haven't taken the impact of more cars on the small road infrastructure in Shalford - both parking on pavements and making roads more busy and dangerous. As there are so many families with young children in the area my main concern is that access to this land is via Chinthurst Lane, which is already heavily congested, and is a key route for families to access walks in Chinthurst Hill and alone the old railway line to Bramley, which will then become more dangerous int he future.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/1011</th>
<th>Respondent: 15188961 / David Regan</th>
<th>Agent:</th>
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<td>I strongly object to the proposal to change the settlement boundary.</td>
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<td>This is a relatively small area of land which is integral to the open, look and feel of the village and any change to this would materially impact the village.</td>
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<td>In addition the only access is from Chinthurst hill which is a hugely busy road already and can't manage the current volume of traffic. The road is often used by children on their bicycles and walking and would be a dangerous change to its use.</td>
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<td>Please reject the proposal.</td>
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<th>Comment ID: PSLPP16/1016</th>
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<td>I object to all erosion of the Green Belt</td>
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<th>Comment ID: PSLPP16/1018</th>
<th>Respondent: 15189377 / Anne Butler</th>
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<td>• I do not believe GBC have put forward a convincing case for the removal of the Horsleys from the Green Belt. This can happen only under ‘exceptional circumstances’ and the desire to build more houses does not constitute an exceptional circumstance. The proposal to remove these ‘open character’ villages from the Green Belt is at odds with the stated aim of GBC to ‘protect the Metropolitan Green Belt’.</td>
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<td>• The planned move of the village boundaries has not been sufficiently justified by GBC in this local plan and appears to have the sole aim of allowing house building.</td>
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<th>Comment ID: PSLPP16/1030</th>
<th>Respondent: 15192257 / Jennifer Cliff</th>
<th>Agent:</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to all erosion of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1286  Respondent: 15192481 / Thomas Collins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the policy to remove the village of Send from the Green Belt. The Green Belt designation of the village of Send provides a key buffer zone between Woking and Guildford that should prevent them from merging in the future and I do not see the 'exceptional circumstances' referenced in 4.3.16. The Government notes that there are 5 main purposes to Green Belt land and I contend that the Green Belt designation of Send is important for maintaining the first 3 of these (listed below).

• to check the unrestricted sprawl of large built-up areas;
• to prevent neighbouring towns merging into one another;
• to assist in safeguarding the countryside from encroachment;
• to preserve the setting and special character of historic towns; and
• to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

In particular, areas of land proposed for removal from the Green Belt include areas behind the school consisting of playing fields and woodland, which are important to the character of the local community and the quality of its schooling, as well as land around the Wey navigation near Carbridge that should not be encroached upon. I only recently moved to the area and I was attracted by the easy access to the countryside that living in Send would afford me and I believe that this proposal will threaten that, making Send a less appealing village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17/363  Respondent: 15192481 / Thomas Collins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Policy 2 of the Green Belt section (paragraph 4.3.15) that would inset Send Business Park form the Green Belt as this is an area of beautiful countryside adjacent to the Wey Navigation and any further development would reduce the openness of the Green Belt. I am also concerned about increased traffic along tannery lane that would result from further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/1034  Respondent: 15192545 / M & JB Koskela  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We are new to the area and object very strongly to the draft local plan you have submitted, our main concerns are:

Lack of protection for the green belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1035  Respondent: 15192609 / Sarah Goody  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

New version of Guildford Local Plan - Objection to Shalford Green Belt/Settlement Boundary

With regards to the above, I object to this proposal. Please note this on your records.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1036  Respondent: 15192673 / Colin Goody  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

New version of Guildford Local Plan - Objection to Shalford Green Belt/Settlement Boundary

With regards to the above, I object to this proposal. Please note this on your records.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8384  Respondent: 15195617 / Scott Brownrigg Planning (Natalie Walter)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Object to proposed Green Belt boundary showing retention of "Land at Hornhatch Farm" as a Green Belt designation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/1113  Respondent: 15195969 / Carrie Wheeler  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) 

I would like to 'bullet' point my main concerns:-

I object to the erosion of the Green belt, the villages of Ripley Wisley Clandons and Send, are apparently earmarked to lose their Green Belt status, this is outrageous. Property in this area commands high prices, this is because of the location. Residents accepted the inflated price in return for being able to live in a pleasant semi-rural location, with the knowledge that as there was green belt land in the area it would not change too drastically or become over developed!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1117  Respondent: 15196097 / Mark Groves and Katie Hamilton  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) 

1. I object to not protecting the Green Belt (Policy P2)

Our Green Belt is precious. It is what protects London from urban sprawl; it preserves air quality; it prevents flooding; it is the city’s playground. It is for us to conserve and protect it. There are 5 legal purposes for Green Belt, and it meets them all:

- To check the unrestricted sprawl of large built up areas
- To prevent neighbouring towns merging into one another
- To assist in safeguarding the countryside from encroachment
- To preserve the setting and special character of historic towns
- To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

This policy is flawed and should have been amended. In the last consultation just six individuals, out of the c. 7,000 of those who took part in the consultation, supported the policy. Another 20 comments of support were from organisations such as: the University of Surrey, local councils (including Guildford), consultants (e.g. Savills) or landowners. But of the 1,371 who commented on the green belt policy 1,332 (97%) were against.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1135  Respondent: 15196257 / Vanessa Ruck  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the careless destruction of the Green Belt. The greenbelt was created to protect from urban sprawl, protect the countryside and provide space for recreation outside of big cities… As a local resident/as a regular visitor/I work in Ripley… I object to the reduction of these green spaces. 13,860 new houses is not sustainable and will damage local communities by overdevelopment – the plans proposed growth based on the SHMA report are more than double the figures used in previous plans. The Guildford local plan proposes an unsustainable increase in population, which will not be sustainable on the current or proposed road networks… As a regular commuter through these villages, I am all too aware of the problems that increased traffic will cause… increased commute… /I work in Ripley…/school run…/the A3 and M25 already suffer from congestion…]

I object to the local plan on the grounds that it will destroy several landscapes of beauty for current residents and visitors as well as future generations. Decreased enjoyment of the area, views, fresh air…

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1137  Respondent: 15196353 / Rosie Cormack  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object most strongly to any building on the GREEN BELT.

I object to any villages that are currently in the GREEN BELT being removed from it, such as the Horsleys, Ripley, Send, Clandons. There can be no justification for it as there are plenty of BROWNFIELD sights still available to accommodate the suggested requirement for some 693 homes per year for the next 20 years.

I object to the possibility of Guildford being increased by some 25 per cent due to the foregoing predictions which are unfounded.

I object most vigorously to any Brownfield sights being used for further factories, offices, warehouses and shops that would not include very substantial affordable housing in their planning footprints.

I object very strongly to any change in current settlement areas.

I object strenuously to any diminution of the current GREENBELT (National Planning Policy Framework Para 79).

I object to any widening of the village boundaries to encroach upon the current Greenbelt.

I object to the scale of new building throughout the Guildford borough which can not be reasonably substantiated and appears completely unfounded and a figment of some distant planners imagination.

I object most strongly and specifically to the proposed building on Gosden Hill Farm which is in the GREENBELT and designed to keep West Clandon from being absorbed into the Guildford sprawl.

I object again most vociferously to any development of Garlick's Arch with a view to creating a spur off the A3 going Southbound or Northbound as the surrounding infrastructure would be totally unable to handle any increase in vehicular traffic. Our already overcrowded village roads would not be able to cope with any increased traffic and would cause a highly increased possibility of injury or death to the local population as sidewalks are virtually non existent or indeed too narrow to accommodate the current village populations.

I object most strongly to any change being made to Newlands Corner, an area of Outstanding Natural Beauty that is
FREE to everybody to enjoy and must remain so.

It is a fact that Surrey County Council has no funds available to repair many of the roads in and around West Clandon - specifically the junction of the A247 and A246 at the South end of West Clandon, and it would appear the Highways Authority have no interest.

The GREENBELT is sacrosanct and must be fully and totally protected at all times for future generations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1142  Respondent: 15196449 / Fran Jepson  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Loss of our green belt - once the green belt is built upon we will never get it back. Our children will grow up in an poorly thought out urbanisation

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1149  Respondent: 15196513 / Alison Precious  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to all erosion of the Green Belt.

I object to any “in setting” (ie removal of any villages from the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1164  Respondent: 15197249 / Deborah Harris  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. Green Belt

2.1. Proposed Submission Local Plan includes the statement “We will continue to protect the Metropolitan Green Belt”. No this is not the case. The housing policies set out in the Proposed Submission Local Plan; indicate that 65% of proposed new developments will take place on land that is currently in the Green Belt.
2.2. Under NPPF regulations GBC and other Local Authorities are permitted, once they have determined their
Objectively Assessed housing Need (OAN), to make allowance for factors which may constrain the delivery of new
housing. Constraints such as the need to protect the Metropolitan Green Belt, or the restrictions required to protect the
Surrey Hills Area of Outstanding Natural Beauty, or land costs etc. Although these designated areas make up a large
proportion of the land area of Guildford Borough, GBC has made no attempt to reduce its housing numbers in order to
take account of such constraints. They have instead increased the number, beyond that required for normal growth
projections to satisfy their own egotistical view on a path of massive economic growth.

2.3. Currently development is permitted within the settlement boundary, where villages are washed over by the
green belt with particular planning regimes being applicable that have proved beneficial in preventing the urbanization of
many villages. They are very successful, because of the non urban nature of small scale new development to help to retain
the openness of the villages. These villages house, in some cases, a population of 4000 plus people, yet are regarded by
residents as small villages. For those who drive through these areas they do not see a mass of urban style developments
but trees and hedges, views between homes, views through spaces that don't reveal row upon row of homes but space and
openness with trees amongst the homes and a variety of scale and architecture.

2.4. Washing some of the larger villages will result in them becoming their own urban sprawl as a result of
proportionate infilling.

2.5. Changes to settlement boundaries have been made in order to make more land available for the developers under
the guise of making the boundaries more defensible. Many straight lines have now been drawn which result in villages
developing hard edge profiles with buildings replacing the fragmented softer edge of the original hedgerows, trees and
green fields.

2.6. Loss of Green Belt resulting from these boundary realignments can only be justified in exceptional
circumstance. None of which have been provided. Moving a boundary from one already defined boundary to another,
again can only be done in exceptional circumstance. Housing need has already been turned down as such an exceptional
circumstance.

2.7. I object to all these changes being made to the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** PSLPP16/1170  **Respondent:** 15198081 / Anita Hogben  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is **Sound?** ( ), is **Legally Compliant?** ( )

1. **I OBJECT TO** all erosion of the Green Belt.

2. **I OBJECT TO** any “in-setting” of any villages from the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/1176  **Respondent:** 15198305 / Georgina Coro  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is **Sound?** ( ), is **Legally Compliant?** ( )
Another reason why we moved to Guildford was for the access to the beautiful Green Belt countryside. We would be absolutely devastated if the beautiful countryside was used to build new housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1179  Respondent: 15198337 / Jack Tallick  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to not protecting the Green Belt (Policy P2)
I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

The Plan should develop the existing brownfield site at Burnt Common rather than developing Garlick’s Arch (A43).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1188  Respondent: 15198401 / Tony Porter  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

• I OBJECT TO all erosion of the Green Belt
• I OBJECT TO any “in-setting” (I.e removal ) of any villages from the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1480  Respondent: 15198913 / Diana Gordon  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

2) The enclosure of protected Green Belt land within the proposed new village boundaries (for there will be a presumption for development in the future).

6) Send should not be removed from the Green Belt as it is a buffer between Woking and Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
### Comment ID: PSLPP16/1198  Respondent: 15205569 / Mark Gurdon  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity.

2. I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

### Comment ID: PSLPP16/1201  Respondent: 15205729 / John Walker  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to not protecting the Green Belt (Policy P2).

I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick's Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

The Plan should develop the existing brownfield site at Burnt Common rather than developing Garlick's Arch (A43).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

### Comment ID: PSLPP16/1203  Respondent: 15205921 / Elizabeth Howlett  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity.

I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

Please register my objection to the Local Plan, we need to consider our children future. We cannot go on building forever over our green belt. Who will stand up and say enough is enough. Surrey Hills is a unique area, let’s keep it that way.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to not protecting the Green Belt (Policy P2) I object to removing Ripley, Send and Clandon, Wisley Airfields and Garlick’s Arch from the Green Belt. Such a change can never be reversed and there are no exceptional circumstances to require such action. There are other areas more suitable for accommodating the required housing, not in the Green Belt and consideration should be given to these sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to not protecting the Green Belt (policy P2) As a regular visitor to Ripley and surrounding areas I value the unbuilt areas that give this part of England it's character. Once the Green Belt is encroached on by development it can never be retrieved. There are more suitable areas for housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/1261</th>
<th>Respondent: 15207841 / Jill Clements</th>
<th>Agent:</th>
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<tr>
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<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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<tr>
<td>I strongly object to the above plan which will ruin our village and spoil the view across the green. (Shalford settlement boundary)</td>
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<tr>
<th>Comment ID: PSLPP16/1273</th>
<th>Respondent: 15208353 / Janet Green</th>
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<td>I would like my comments to be seen by the Inspector.</td>
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<td>6) I OBJECT TO any ‘in setting’ (i.e removal) of any villages from the Green Belt</td>
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<th>Comment ID: PSLPP16/1277</th>
<th>Respondent: 15208417 / Colin Green</th>
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<th>Comment ID: PSLPP16/1281</th>
<th>Respondent: 15208513 / Lauren Green</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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**Section page number**

Page 1076 of 1782

**Document page number**

1077
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I would like my comments to be seen by the Inspector.

1) I OBJECT TO all erosion of the Green Belt

6) I OBJECT TO any ‘in setting’ (i.e removal) of any villages from the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/1283</th>
<th>Respondent: 15208545 / Charlotte Green</th>
<th>Agent:</th>
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I would like my comments to be seen by the Inspector.

1) I OBJECT TO all erosion of the Green Belt

6) I OBJECT TO any ‘in setting’ (i.e removal) of any villages from the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/1287</th>
<th>Respondent: 15215841 / Andrew Boyce</th>
<th>Agent:</th>
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</table>

I am writing to express my opposition to the draft local plan currently under consideration, namely:

I object to the erosion of the greenbelt

I object to the removal of any villages from the Greenbelt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/16321</th>
<th>Respondent: 15216129 / Timothy Hewlett</th>
<th>Agent:</th>
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I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16398  Respondent: 15216129 / Timothy Hewlett  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

The Plan should develop the existing brownfield site at Burnt Common rather than developing Garlick’s Arch (A43).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1295  Respondent: 15216321 / Douglas Ollington  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the 2016 Draft Local Plan by Guildford Borough Council (GBC) for the following reasons:

1. Destroying the Green Belt

I object to the proposal to remove (“in-set”) Ripley, Send and Clandon from the Green Belt.

No one in this country voted for destroying the Green Belt. We already live in one of the most overcrowded parts of the country. Roads are congested, schools and hospitals are full to capacity. Just to drive out of our village in the morning can take up to 15 minutes to cover a few hundred meters. This is stressful and will only get far worse with more houses.

We are filled with despair at losing what our families have worked all our life so hard for. They have worked hard to ensure their family live in “England’s green and pleasant land”, away from the suburban sprawl. All this is in jeopardy with this plan.

By building more and more houses, this will not only further congest an already congested road network, but the overcrowding will create further pressure on schools, hospitals, and other services, all of which will require more people to be employed, which will probably result in a further round of house building and so on. What is GBC doing to consider the wellbeing of their constituents? Was not happiness and wellbeing also on our Prime Minister’s agenda?

High volumes of traffic and congestion have negative effects. These include road collisions, the severance of communities, the costs of delays and the unreliability of journey times to people and businesses. Environmental impacts include traffic noise, air pollution and amenity issues. At a global scale, vehicle emissions contribute to climate change.
Some parts of the major roads in Surrey operate significantly beyond their capacity, resulting in traffic congestion, and forcing drivers down rural / country lanes to avoid main roads, leading to further congestion and road accidents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1304  Respondent: 15219585 / Ray Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Guildford Borough Council proposed Local Plan June 2016 for the following reasons.

1.  I object to the plan because it proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas for housing increases.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1307  Respondent: 15220097 / Douglas Barr Trudy Amos  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1.  We object to not protecting the Green Belt (Policy P2)

We object to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. Once taken the green belt is lost forever.

There are no exceptional circumstances for these villages and the land to be taken from the Green Belt.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/478  Respondent: 15220097 / Douglas Barr Trudy Amos  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Green Belt, Policy 2 at paragraph 4.3.15
Send Business Park now taken out of the Green Belt altogether

We object to the proposal to inset Send Business Park from the Green Belt because:

- It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation
- There is highly restricted vehicular access along Tannery Lane in both directions
- Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1317  Respondent: 15220321 / K P Buchanan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

This Draft Plan should be rejected. Development on the Green Belt sites is not justified. There are no 'special circumstances' which justify using Green Belt land as proposed by this Plan. Green Belt land acts as a necessary buffer between Woking and Guildford, it is a valuable and beautiful amenity enjoyed by thousands of residents and it is unjustified and thoroughly ill-considered to use this Green Belt to meet this Local Plan particularly as there are far more appropriate alternatives.

Please ensure my comments are placed before the Planning Committee and the Councillors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13351  Respondent: 15225281 / Roger Gamlin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing to you personally to ask you to stop the villages around Guildford from being removed from the Green Belt.

We are currently faced with an attack by concrete invaders which will take some of our local villages out of the Green Belt forever, once they have been lost there is no going back.

In particular I am referring to Send and Ripley, both traditional English villages, surrounded by beautiful and in some cases ancient woodland. I am writing to you personally to ask you to stop the villages around Guildford from being removed from the Green Belt.

We are currently faced with an attack by concrete invaders which will take some of our local villages out of the Green Belt forever, once they have been lost there is no going back.

In particular I am referring to Send and Ripley, both traditional English villages, surrounded by beautiful and in some cases ancient woodland.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: pslp171/274  Respondent: 15225281 / Roger Gamlin  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Green Belt Policy 2 para 4.3.15

I object to the proposal to inset Send Business Park from the Green Belt because it is an area of outstanding beauty and should be preserved not built upon.

Vehicular access to Tannery Lane is already severely restricted and this is a wholly inappropriate site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/91  Respondent: 15226465 / Rupert Trevelyan  Agent: Rapleys (Henry Asson)

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The policy echoes the guidance of the NPPF in saying that the Green Belt will be protected, and that while development on Green Belt land will be considered inappropriate in general, infilling within villages is acceptable. The policy identifies Gomshall as one of the villages within which limited infilling is permitted, and the draft plan proposes to increase Gomshall’s identified boundary in order to include the site, both of these things are supported.

The document’s glossary entry for infilling has been amended from “the filling of an underdeveloped plot in an otherwise built up frontage by not more than two dwellings.” It now reads: “Development of a small gap in an otherwise continuous built-up frontage, or the small-scale redevelopment of existing properties within such a frontage. It also includes infilling of small gaps within built development.” This definition broadens the terms of what is considered infill, and appears to recognise that a greater level of tolerance is required in order to ensure that the plan can meet the borough’s housing requirement.

The widening of the identified boundaries of villages, along with the broadening of the plan’s definition of infill, is supported. My client’s land is located within the village envelope, and is a gap within the built development, and thus meets the definition of infill as set out in the local plan. In the interests of certainty, the local authority’s confirmation of this would be much appreciated.

Please do not hesitate to get in touch if you have any questions relating to the above. In the meantime I would be grateful if you could confirm receipt of this representation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1344  Respondent: 15226625 / M Mackender Lewis  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
The Cemetery enlargement in Send Hill has now been offered to all denominations which will increase both traffic and parking problems adding yet more chaos from your proposed development. If you take in consideration the traffic from schools and their latest rebuilds, this will increase the traffic problems. By the riding stables on Send Hill the road gets even narrower and very dangerous leading into Potters Lane.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5094  Respondent: 15227329 / Sharon Pask  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Re: Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I strongly object to the draft Local Plan for a number of reasons,namely:

I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated,without the need to encroach on protected Green Belt land. Election manifesto promises to (the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1368  Respondent: 15227585 / Kelly Bartlett  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Re: Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I am employed in the Ockham area and wish to strongly object to the draft Local Plan for a number of reasons,namely:

I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1378  Respondent: 15227617 / James Pask  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1501  Respondent: 15227617 / James Pask  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

I object to the draft Local Plan for the following key reasons:

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4378  Respondent: 15227809 / David Hall  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

I strongly object to your proposal to remove, Send, Send Marsh/Burnt Common & Ripley from the Green Belt and expanding their boundaries which encroach on a large proportion of Green Belt Land, which is to be used for Housing & Industrial development, (Policy P2).

This proposal is in direct contravention to the Government's stated Policy as part of their pre election manifesto and their issued guide lines to Councils with respect to the preservation of Green Belt land
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1387  Respondent: 15227905 / Nigel Alexander  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1. I object to a plan which proposes that over 70% of new housing be built within the Green There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13737  Respondent: 15227905 / Nigel Alexander  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY P2 (GREEN BELT):

- No declaration of support for protecting the Guildford Green Belt, contrary to NPPF and government statements.
- No evaluation of value of local Green Belt as a public and private asset: it’s just treated as potential building land with a few inconvenient restrictions.
- Impact of Green Belt development on local agriculture ignored.
- Impact on rural leisure and tourism ignored.
- Impact on flood control ignored.
- Impact on carbon sink and knock-on effects for air pollution and climate change ignored.
- Impact on biodiversity ignored.
- Impact on natural heritage ignored.
- Impact on water catchment ignored.
- Impact on room for public space amenities (parks, cemeteries, waste facilities etc) ignored.
- Impact on rural business (e.g. mineral mining, film making) ignored.
- Impact on natural landmarks and views ignored.
- Harm to public health and wellbeing (physical, psychological) ignored.
- Allows excessive levels of development in breach of views expressed in last consultation and Conservative Party manifesto commitments at the last local elections.
- Has allowed ruling Councillors to argue that there is an acceptable percentage of Green Belt that should be sacrificed to development, when no such rule exists in
the NPPF.
• Ignores alternative approaches, such as fair burden-sharing under which settlements would undertake to accommodate new development in proportion to their size.
• Disproportionate amount of development (most of it, in fact) to be in Green Belt. Too few new homes in urban areas where most people (especially the young and less privileged) want to live. This will act against much needed urban regeneration.
• “Insetting” of most villages disproportionate and unjustified in terms of their contribution under the NPPF to the purposes of the Green Belt. Based on flawed Green Belt and Countryside Study. Idea that most Guildford villages do not contribute to “openness” is subjective.
• Major settlement extensions allow indiscriminate housebuilding, as irregularly shaped villages are squared off to enclose green fields.
• Overall harm to Guildford Green Belt unjustified by any objective development need post-Brexit.
• Ignores most of NPPF 17 stipulations.

In addition to these comments I attach a key document I have referred to which gives greater detail of all the points of objections all of which I support fully.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1408  Respondent: 15229313 / Caitlin Gordon  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

2) The enclosure of protected Green Belt land within the proposed new village boundaries (for there will be a presumption for development in the future).

6) Send should not be removed from the Green Belt as it is a buffer between Woking and Guildford.

I strongly OBJECT to all of these plans and feel it goes completely against honouring your repeated election promises to protect the green belt!

I would like all my comments to be seen by the inspector.

Please do the right thing and save Send and Ripley's hugely important Green Belt. I feel it is important to honour promises made and that this development Plan will cause a loss of trust by all residents. It will disrupt the idealistic village environment currently enjoyed and destroy the desirability to live in such an incredible area.

Do not destroy the identity of our village.

Act in the interests of the current residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1426  Respondent: 15231233 / Jenny Bridge  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
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<td>I trust my voice will be added to the thousands objecting.</td>
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<td>I object to all erosion of the Green Belt.</td>
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<td>We support the change to the Policy Map that indicates that Send Business Park is now inset from the Green Belt. The extent of the land inset from the Green Belt is broadly contiguous with the long established industrial curtilage of these</td>
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business premises and which has been used initially for industrial and latterly for a wider range of business purposes for very many years. This is elaborated further in the attached Masterplan for Send Business Centre that was prepared at the request of the Borough Council in January of this year and which the subsequent Employment Topic Paper commented: “Initial master planning ideas show sensitive design to complement the surroundings.”

There has been concerns expressed by some local residents over the proposed change to the Policy Map in relation to Send Business Centre, these focussing on:

- It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation
- There is highly restricted vehicular access along Tannery Lane in both directions
- Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate

Looking at each of these concerns in turn, we would like to comment as follows:

**It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation**

In response to these concerns it is right to say that the business complex has been established at the site for many years: indeed, industrial activity at this site has continued without a break over the past 200 years or so. The premises - and the local /village employment it brings - has therefore served the local community and the rest of the borough since time immemorial. Whilst it is acknowledged that local people value the attractive appearance of the surrounding countryside, by any reasonable test the same could not be said of the appearance of the site and its curtilage which is used for car parking, open storage and industrial buildings. Nevertheless, change can be the impetus for improvements: the land between the canal and the River Wey is also within the ownership of SBC and is testament as to how the present owners have invested in improving the appearance of the site in collaboration with The National Trust such as the public garden the owners have installed by Tanyards Bridge. These improvements are set to continue if the proposal to inset the site from the Green Belt is confirmed with opportunities for further improvements and landscaping of the site. The recently published (July 2017) Rural Economic Strategy for the Borough specifically identifies Send Business Centre where improvements are being made. Page 25 of the Strategy highlights the site as a Case Study commenting as follows:

> “There is a strongly supportive and sustainable rural business and community atmosphere among current tenants and, with funding support from the Enterprise M3 Local Enterprise Partnership, the family owners are bringing to fruition ambitious plans to develop a creative hub hosting hi-tech film and video studio and post-production facilities. Collaboration with the National Trust has resulted in canal-side improvements that are being further enhanced by the building of a marina to provide moorings away from the main waterway”. (see page 25 Rural Economic Strategy published by Guildford Borough Council, July 2017).

**There is highly restricted vehicular access along Tannery Lane in both directions.**

As to the vehicular access to the site along Tannery Lane, this issue has been specifically addressed by highway experts Bellamy Roberts who have been advising the owners regarding access and traffic issues and is referred to in detail in the accompanying Masterplan under the heading “Movement”. In this regard, it is important to point out that:

1. Historically, the site generated significant HGV movements in the past associated with the previous industrial processes that were carried out on site. Due to the site’s historical B2 and B8 uses, it continues to generate a significant number of HGV movements every day, although HGV use is declining as the site moves to business within the B1 and R&D classes.

2. Planning permission was obtained to divert a section of Tannery Lane to a new alignment running along the south-eastern boundary of the site. That consent remains extant because a lawful start was made on its construction and a Lawful Development Certificate was issued at that time by the Council. The company plans to complete the road realignment when it has sufficient funds to do so as part of the consolidation of the entire site. When completed this will bring about significant improvement to highway and pedestrian safety.

3. The site already has in place a green travel plan and is in discussions with another employment site in Send regarding running a peak hour direct bus service to Woking and Guildford city centres. The new development will incorporate a
4. Although much of this section of Tannery Lane is a narrow rural road it accommodates the existing levels of traffic without undue difficulty. There have been no injury accidents along that section of Tannery Lane between the Business Park and the A247 junction or in the car park adjoining Tannery Lane during the last five years. As part of the Master Plan proposals it is intended that improvements will be carried out to the extent that this is feasible within the existing highway boundaries and these measures will improve forward visibility around bends and create passing bays.

5. Furthermore, additional improvements are likely to take place at the junction of Tannery Lane and the A247 arising from other developments within the village.

Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate

It is acknowledged that additional buildings will be associated with the planned expansion on the adjoining ‘curtilage’ land. Nevertheless, as acknowledged by the council, “the Initial master planning ideas show sensitive design to complement the surroundings.” Moreover, NPPF acknowledges that the limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land) such as Send Business Centre can be considered to be appropriate development in a Green Belt provided that certain conditions are met.

The council are however, taking the correct approach by ‘insetting’ the site from the Green Belt acknowledging not only the fact that the site has over the past two centuries performed an important role in providing much need employment for local people but that it can perform perhaps a more important role in the future by, for example, continuing to provide low-cost serviced office space with high-speed broadband access, with many of the existing companies have been supported from a great range of industries, with occupiers including Queens Award winners in healthcare, finance, property, insurance companies and start-ups. The site’s current focus is the creative digital creative sector: a key building block in the Borough’s economic growth.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/901  Respondent: 15233025 / Wey Estates Ltd (Michael Hamburger)  Agent: Grant Consultancy (Alastair Grant)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy P2 Green Belt

We support the change to the Policy Map that indicates that Send Business Park is now inset from the Green Belt. The extent of the land inset from the Green Belt is broadly contiguous with the long established industrial curtilage of these business premises and which has been used initially for industrial and latterly for a wider range of business purposes for very many years. This is elaborated further in the attached Masterplan for Send Business Centre that was prepared at the request of the Borough Council in January of this year and which the subsequent Employment Topic Paper commented: "Initial master planning ideas show sensitive design to complement the surroundings."

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Looking at each of these concerns in turn, we would like to comment as follows:

It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation

In response to these concerns it is right to say that the business complex has been established at the site for many years: indeed, industrial activity at this site has continued without a break over the past 200 years or so. The premises - and the local/village employment it brings - has therefore served the local community and the rest of the borough since time immemorial. Whilst it is acknowledged that local people value the attractive appearance of the surrounding countryside, by any reasonable test the same could not be said of the appearance of the site and its curtilage which is used for car parking, open storage and industrial buildings. Nevertheless, change can be the impetus for improvements: the land between the canal and the River Wey is also within the ownership of SBC and is testament as to how the present owners have invested in improving the appearance of the site in collaboration with The National Trust such as the public garden the owners have installed by Tanyards Bridge. These improvements are set to continue if the proposal to inset the site from the Green Belt is confirmed with opportunities for further improvements and landscaping of the site. The recently published (July 2017) Rural Economic Strategy for the Borough specifically identifies Send Business Centre where improvements are being made. Page 25 of the Strategy highlights the site as a Case Study commenting as follows:

“There is a strongly supportive and sustainable rural business and community atmosphere among current tenants and, with funding support from the Enterprise M3 Local Enterprise Partnership, the family owners are bringing to fruition ambitious plans to develop a creative hub hosting hi-tech film and video studio and post-production facilities. Collaboration with the National Trust has resulted in canal-side improvements that are being further enhanced by the building of a marina to provide moorings away from the main waterway”. (see page 25 Rural Economic Strategy published by Guildford Borough Council, July 2017).

As to the vehicular access to the site along Tannery Lane, this issue has been specifically addressed by highway experts Bellamy Roberts who have been advising the owners regarding access and traffic issues and is referred to in detail in the accompanying Masterplan under the heading ‘Movement’. In this regard, it is important to point out that:

1. Historically, the site generated significant HGV movements in the past associated with the previous industrial processes that were carried out on site. Due to the site’s historical B2 and B8 uses, it continues to generate a significant number of HGV movements every day, although HGV use is declining as the site moves to business within the B1 and R&D classes.
2. Planning permission was obtained to divert a section of Tannery Lane to a new alignment running along the south-eastern boundary of the site. That consent remains extant because a lawful start was made on its construction and a Lawful Development Certificate was issued at that time by the Council. The company plans to complete the road realignment when it has sufficient funds to do so as part of the consolidation of the entire site. When completed this will bring about significant improvement to highway and pedestrian safety.
3. The site already has in place a green travel plan and is in discussions with another employment site in Send regarding running a peak hour direct bus service to Woking and Guildford city centres. The new development will incorporate a range of effective travel planning measures to reduce car usage, together with cycle parking in accordance with the Council’s standards.
4. Although much of this section of Tannery Lane is a narrow rural road it accommodates the existing levels of traffic without undue difficulty. There have been no injury accidents along that section of Tannery Lane between the Business Park and the A247 junction or in the car park adjoining Tannery Lane during the last five years. As part of the Master Plan proposals it is intended that improvements will be carried out to the extent that this is feasible within the existing highway boundaries and these measures will improve forward visibility around bends and create passing bays.
5. Furthermore, additional improvements are likely to take place at the junction of Tannery Lane and the A247 arising from other developments within the village.

It is acknowledged that additional buildings will be associated with the planned expansion on the adjoining ‘curtilage’ land. Nevertheless, as acknowledged by the council, “the Initial master planning ideas show sensitive design to complement the surroundings. ” Moreover, NPPF acknowledges that the limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land) such as Send Business Centre can be considered to be appropriate development in a Green Belt provided that certain conditions are met.
The council are however, taking the correct approach by 'insetting' the site from the Green Belt acknowledging not only the fact that the site has over the past two centuries performed an important role in providing much needed employment for local people but that it can perform perhaps a more important role in the future by, for example, continuing to provide low-cost serviced office space with high-speed broadband access, with many of the existing companies having been supported from a great range of industries, with occupiers including Queens Award winners in healthtech, finance, property, insurance companies and start-ups. The site’s current focus is the creative digital creative sector: a key building block in the Borough’s economic growth.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  masterplanv8.pdf (2.7 MB)
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<th>Comment ID: PSLPP16/1454</th>
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<tr>
<td>As a Normandy resident of more than 20 years I wish to object to the desecration that would be caused by the adoption of the proposed Local Plan and especially the devious way in which a late amendment was introduced.</td>
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<td><strong>Reasons:</strong></td>
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<tr>
<td>1. <strong>Green Belt:</strong></td>
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<td>I have lived in Normandy for many years and I truly value our green belt its use for development would be irreversible.</td>
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<td>There are brown field sites around which possibly could be used in and around the borough as a priority.</td>
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<td>2) I object to all erosion of the green belt.</td>
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<td>7) I object to the wholesale destruction of the Green Belt in this area</td>
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<td>Secondly, I object to the failure to protect the Green Belt (Policy P2)</td>
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<td>I object to removing Ripley, Send and Clandon, Wisley Airfield and Garlick's arch from the Green Belt. There are no stated exceptional circumstances for these villages and sites areas being removed, as stipulated in the National Planning Policy.There are many brownfield sites in Surrey (Guildford and Woking) which should be used before even considering removal of country areas such as Garlick’s Arch (A43).</td>
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### Comment ID: PSLPP16/1481  Respondent: 15234017 / Martin Head  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I would like my comments to be seen by the inspector.

This plan has not been thought through, with potential major impacts on the villages of Send and Ripley.

The traffic is already bad particularly at rush hour times and also affected badly when the A3 is blocked around Guildford.

- I object to 2016 Draft local Plan
- I object to all erosion of the Green Belt
- I object to any “in-setting” of any villages from the Green Belt

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

### Attached documents:

### Comment ID: PSLPP16/1484  Respondent: 15234177 / Brianne Vally  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object about all erosion of the green belt and any in-setting (ie removal) of any villages from the green belt. Has consideration been made to develop The existing brownfield site at burnt common? (Policy P2)

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

### Attached documents:

### Comment ID: PSLPP16/1487  Respondent: 15234273 / Martin Jones  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

3. I object about all erosion of the green belt and any in-setting (ie removal) of any villages from the green belt. Has consideration been made to develop The existing brownfield site at burnt common? (Policy P2).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

### Attached documents:

### Comment ID: PSLPP16/1494  Respondent: 15234529 / Oliver Pask  Agent:
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) -

Allocation A35 -for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1. I object to a plan which proposes that over 70% of new housing be built within the Green There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1561  Respondent: 15234849 / Alastair Fleming  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the erosion of the Green Belt in clear contravention of the Government's and Conservative councillor's election manifesto promises to protect the Green Belt. In particular, I object to Send being removed from the Green Belt (Policy P2) as Send provides a buffer between Woking and Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1569  Respondent: 15234849 / Alastair Fleming  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the failure of Guildford Borough Council to include the Town Centre Masterplan 2015 in the Local Plan and to find sufficient brownfield sites for development prior to considering sites within the Green Belt.

Please ensure that this letter, listing all of my objection, will be passed to the Planning Inspectorate for examination.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10370  Respondent: 15238049 / Glenda Charlick  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
This Green Belt was implemented for a reason, to protect from urban sprawl, to ensure Green spaces for generations to come not just for our generation. The Green Belt is not just for the people who live in the villages but for Londoners too for their health and their mental well being. There are plenty of other places to build that are more suitable, this seems to me to be a corrupt way for someone to make money at the expense and misery of everyone else not just for today but for the children and the wildlife of the future.

I object to any "in-setting (i.e. removal) of any villages from the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Andrew Povey (S.C.C leader) said providing more homes should not happen if it means cementing our vast area of countryside. Sir Paul Beresford and GBC conservative councillors stood on a policy of no development in the green belt unless in exceptional circumstances – There are no exceptional circumstances. The whole issue of in setting is undemocratic. Local people have raised concerns for the last decade concerning over development of our villages. I know Sir Paul Beresford is on record as saying that local people must have a real say in housing numbers he is also omitted to protecting our natural environment and wildlife from over-exploitation of resources and development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/1578</th>
<th>Respondent: 15239425 / Debbie Preece</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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I object to all erosion of the Green Belt.
I object to any “in-setting” (ie removal) of any villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/1616</th>
<th>Respondent: 15240161 / R O Moore</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
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</table>

2. Removal of Green Belt (Policy P2)

Ripley, Send, Clandon and sites at Wisley Airfield (A35) and Garlick’s Arch (A43). must not be removed from the Green Belt, I object to the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/415</th>
<th>Respondent: 15241185 / Jill Gooding</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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</table>

I STRONGLY object to the 2016 Draft Local Plan on the following grounds;
I PARTICULARLY OBJECT to the erosion of the Green Belt.
I OBJECT to the lack of any evidence for the alleged housing need numbers
I OBJECT to the last minute inclusion of new sites with less than 2 weeks notice

I OBJECT to the limited consultation period

I OBJECT to any removal of any villages from the Green Belt

I OBJECT to a disproportionate amount of development in a single area

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/6343</th>
<th>Respondent: 15241185 / Jill Gooding</th>
<th>Agent:</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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<td>I object to the draft Local Plan for the following key reasons:</td>
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<tr>
<td>1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.</td>
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<tr>
<td>2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt</td>
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<th>Comment ID: PSLPP16/10711</th>
<th>Respondent: 15241185 / Jill Gooding</th>
<th>Agent:</th>
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| Comment ID: pslp17/465 | Respondent: 15241313 / Christine Relf | Agent: |
Policy P2- Green Belt

I OBJECT. This policy states, "the general extent of the Green Belt has been retained." This is a lie.

The policy wording is tepid in support of the Metropolitan Green Belt even though the latter forms 89% of the borough and should be the cornerstone of all local planning policy. It is precious beyond the short-term demands of the present Government's policy or a 15-year local plan. As noted under Policy S1 above, it is a solemn legacy to future generations - an asset and amenity that belongs as much to Londoners and the whole nation as to the people who live in it. It is an inalienable public good. Once gone it is gone forever. It is not the Council's to give away.

Policy P2 omits any assessment of the Green Belt's value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. Building on it involves high opportunity costs, including an irreversible loss of:

- Agricultural production
- Rural leisure and tourism amenities
- Water catchment
- Flood control Biodiversity
- Natural heritage
- A carbon sink for air pollution
- Room for public facilities such as parks and burial grounds
- Profitable film locations (e.g. Shere)
- Future economic potential such as mineral extraction (even tracking)
- Natural beauty, landmarks, open space, rural views and sight lines
- Benefits to public health and wellbeing, physical and psychological (as well expressed in the NPPF)"6

As a matter of law, morality and national and local policy, these assets should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultations.
It is disreputable to argue, as the Council do, that the plan would involve the loss of "only" 1.6% of the borough's Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no "acceptable" percentage (in the NPPF or anywhere else) of Green Belt that may be sold. No-one argues that we should sell 1.6% of the Crown jewels in order to build houses.

I am not opposed to appropriate development in the Green Belt and recently supported a major planning application in my own village. But I fail to see why a system of fair burden-sharing of new development cannot be applied to the borough's existing settlements in proportion to their size. This alternative would minimise the strain on infrastructure and maximise the chances of retaining the character of each settlement through gradual growth. It is reasonable to ask urban Guildford, with \( x \) times the population of semi-rural East Horsley for instance, to accommodate \( x \) times the number of new homes over the plan period. Parish councils could be asked, and will no doubt be willing, to propose where their quota of houses should go. Most rural residents are reasonable people who, if not alienated by top-down planners, will support realistic numbers of new houses in their neighbourhoods. Unfortunately, this democratic, bottom-up approach has not been attempted.

Instead, while developers flip and land-bank urban sites as a financial speculation, this plan will dump most new development on greenfield sites where building costs are lower, covering the Green Belt with dozens of housing estates that few residents want. 8,086 new houses are planned for the Green Belt but only 1,135 for Guildford urban area. This is disruptive, socially inequitable and unnecessary. It will not only destroy countryside but will also delay and disincentivise much-needed urban regeneration. The remarkable revival and repopulation of central London shows that building dormitory satellite settlements is an out-of-date approach to planning.

I particularly protest at the "insetting" of 14 villages from the Green Belt, and at "infilling" 12 of the borough's Green Belt villages. I am deeply disturbed that settlement boundaries are to be hugely extended in many villages and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are "leggy" in outline, reflecting the effect of ribbon development (often along just one side of existing roads) permitted between the Wars. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the "openness" of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF's other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost hellbent on self-defeat.

I believe this policy is based on a flawed Green Belt and Countryside Study that, according to one Conservative Councillor, was irregularly commissioned by Council officers without the authority of Councillors. To "inset" two thirds of the borough's rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough's location on the edge of Metropolitan London. I

"8 See Ministerial foreword: "Our natural environment is essential to our wellbeing , and it can be better looked after than it has Habitats that have been degraded can be restored . Species that have been isolated can be reconnected . Green Belt land that has been depleted of diversity can be refilled by nature- and opened to people to experience it, to the benefit of body and soul."

"9 Councillor Matthew Sarti, Planning Committee meeting, 18 May 2016 .

cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, although they would quickly destroy them if the proposed "insetting" and boundary extensions go ahead. This policy is wildly disproportionate in terms of any foreseeable development need (especially post-Brexit) and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17's aim of "empowering local people to shape their surroundings" and other NPPF provisions."10

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/1755</th>
<th>Respondent: 15244641 / Wesley Raynbird-Tilbury</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

SITES

1. Green Belt sites

I OBJECT to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that "allocating these sites does not grant planning permission for development, however, it does identify the principle of development and uses." This ignores the tens of thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. This amounts to a war of attrition by the Council in conjunction with developers, since many busy residents are sick and tired of repeating the same comments to deaf ears. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014.13 Some residents have concluded that commenting is a waste of time.

"13 Further discredited by criminality on the Council. Former lead Councillor for planning Mokija Juneja, architect of the 2014 draft plan, is currently serving a two-year sentence on 3 counts of forgery, pretending to be a barrister and obtaining dishonest pecuniary advantage.

All Green Belt sites should be removed from the plan until "exceptional circumstances" for development are proven, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. "14

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1764  Respondent: 15245313 / C.A. Lindsay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Protecting

P2 & P3 The Greenbelt and the Countryside The Greenbelt and the Countryside must be retained as “the greenbelt” and “the countryside”, not seen as optional, attractive development opportunities. If they are not safeguarded, we will never get them back, and we and future generations of Guildfordians will be the losers.

I object to what I believe is deference made to demands from business developers for easier, glamorous schemes and bigger profits: over what is actually in the best interests of residents and the environment – using brownfield and maximising the use of brownfield sites.

We have a particular interest in this issue also. Until 2015, Guildford Borough Council owned an empty piece of brownfield land, of over 1,000 square metres, near our home, in Christchurch ward. It had good access to two roads.

From 1975 when we first came to Guildford, we were told that it would be wanted for development. But in 2015 it was sold-off as garden-land, at £36 per square metre, and we have been unable to find-out the reason.

I do not know how many units of housing can be accommodated on 1,000 sq m.; it would be interesting to know this also. It appears to be a failure of duty by the Council.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1991  Respondent: 15245313 / C.A. Lindsay  Agent:
I am writing to lodge my objections to the Guildford Borough Council Draft Local Plan.

Specifically:

I OBJECT TO all erosion of the Green Belt.

I OBJECT TO any "in setting" (ie removal) of any villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the 2016 Draft Local Plan.

I object to Ripley, Send and Clandon being removed from the Green Belt, which I believe is called 'in-setting'.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPP16/1819  **Respondent:** 15246497 / G F Bennett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object to however, you can consider taking away the green belt land, to build what sounds like, you want to build a china town when you could use plenty of brown land.

How can anyone agree with such plans? Ridiculous.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/1802  **Respondent:** 15247265 / Aileen Aitcheson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**POLICY P2: Green Belt**

Local Plan Policy P2 states that: *We will continue to protect the Metropolitan Green Belt*. We fully and un-equivocally support this policy.

Unfortunately, despite such brave words, GBC appears to be in breach of this policy itself through the housing policies that it has set out in the Local Plan. The analysis included in the Appendix shows that around 65% of the developments proposed in the Proposed Submission Local Plan are to be built on land currently within the Metropolitan Green Belt. We consider this outcome to be outrageous.

Under NPPF rules, GBC is permitted to make allowance for factors which may constrain the delivery of new housing, such as the need to protect the Metropolitan Green Belt or the restrictions required to protect the Surrey Hills Area of Outstanding Natural Beauty (‘AONB’) which is offered protection under the NPPF comparable to that of a national park. Although these areas make up a large proportion of the land area of Guildford Borough, GBC makes no attempt to reduce its housing delivery in order to take account of such constraints. I find this approach inexplicable.

There are also a number of further issues relating to the detailed implementation of this policy which are set out further below:

1. **a) Paragraph 4.3.13: Proposal to inset East Horsley from the Green Belt**

Policy P2 proposes that East Horsley should be inset from the Green Belt, instead of being ‘washed over’ as it is today. Currently development is permitted within the settlement boundary, although this area is still considered to be Green Belt with a particular planning regime being applicable.

East Horsley is set in a rural location and the village has the look and feel of a rural village. Its Green Belt status has been a key factor in preserving that character. Moreover, being ‘washed over’ by the Green Belt has not been a serious constraint on development within the village. For example, GBC’s planning records indicate that no less than 149 net new homes were added to the village housing stock through in-filling and brownfield developments between 2000 and 2015.

GBC attributes the need to inset East Horsley to NPPF requirements, arguing that the test for remaining ‘washed over’ is that the village should make an important contribution to the openness of the Green Belt. This East Horsley clearly does. No less than 36% of East Horsley is composed of woodlands, whilst inside the settlement area there is an average housing density of just 8.1 dwellings per hectare (‘dph’). Woodlands and large residential gardens make a vital contribution towards bio-diversity, provide wildlife corridors, and furnish those open spaces which are vital to the character of the greenbelt. It is one thing for a planner to study a map and see a settlement area filled with housing, but it is quite another.
actually to come to a rural village like East Horsley and see how the Green Belt has preserved the rural character and openness of this village.

Today East Horsley is a picturesque and flourishing rural community, which has and continues to experience steady incremental growth as a result of being ‘washed over’ by the Green Belt. As the saying goes: “If it ain’t broke, don’t fix it”. This applies to East Horsley in the matter of insetting.

I therefore OBJECT to the proposal to inset East Horsley from the Green Belt and request that this proposal be dropped from the Local Plan.

1. **b) Paragraph 4.3.16 and Proposals Map: Settlement Boundary changes in East Horsley**

GBC are proposing to make a number of changes to the settlement boundaries of East Horsley and so expand the settlement area, as set out in the Proposals Map, with the justifications seemingly provided in the Green Belt & Countryside Study prepared by the consultants, Pegasus.

I object to two specific boundary changes, which have been proposed, as follows:

1. There is a proposal to move the East Horsley settlement boundary westwards from behind the houses on the west side of Ockham Road North up to the eastern boundary of Lollesworth Wood. This proposal removes over 5 hectares of agricultural fields from the Green Belt. The present boundary line is clearly defined by a deep and well-maintained drainage ditch which is classified by the Environment Agency as a ‘main river line’ and therefore represents a highly defensible Green Belt boundary.

Moving this boundary west to the edge of woodland in no way improves its defensibility. Under NPPF rules Green Belt boundaries should only be changed in ‘exceptional circumstances’. I do not believe this proposal can be considered as an exceptional circumstance. Clearly the only justification for this change is to bring a large agricultural field within the settlement area in order to provide more housing land. However, under NPPF rules this is not a sufficient justification for changing a Green Belt boundary. As such, I believe it is an invalid proposal.

**I accordingly OBJECT to this proposed boundary change.**

1. There is also a proposal to move the East Horsley settlement boundary westwards from behind the houses on the west side of Kingston Avenue up to a tree line running along the Parish Boundary at the western edge of Kingston Meadows. The present settlement boundary is clearly defined by a deep and well-maintained drainage ditch running along its eastern side. It therefore represents a very defensible Green Belt boundary. Moving this boundary westwards to the edge of woodland in no way improves its defensibility. Under NPPF rules Green Belt boundaries should only be changed in ‘exceptional circumstances’. I do not believe that this can be considered as an exceptional circumstance. As such we believe this is an invalid proposal.

**I accordingly OBJECT to this proposed boundary change.**

In the Green Belt & Countryside Study and its accompanying Topic Paper, GBC justifies the need to make changes in settlement boundaries in order to meet unfulfilled housing need in the Borough. However, Green Belt rules make it clear that unfulfilled housing need is not normally considered to be ‘an exceptional circumstance’. If it were the entire Green Belt would already be covered in tarmac.

The NPPF is clear that every movement in settlement boundaries must be justified by ‘exceptional circumstances’. GBC have offered only a generic justification in their Topic Paper of meeting unfulfilled housing need, but a case by case justification has not been provided. As such, I believe the settlement boundary changes referred to above (and many others) are invalid without such detailed justification.

1. **c) Paragraph 4.3.17: Proposal to remove Wisley Airfield from the Green Belt**
I OBJECT to the proposal to remove Wisley Airfield from the Green Belt. The only justification for this proposed change is unfulfilled housing need which is not considered an exceptional circumstance. The proposed Wisley development is discussed further below in the Site Allocation section.

1. d) POLICY P2: Limited In-filling

A new planning designation has been introduced called ‘the identified boundary of the village’. For East Horsley this covers a number of roads south of the A246. It is a sizeable area, covering 45 hectares, the equivalent of 23% of the present Settlement Area of the village. Within this area, Policy P2 sets out proposals that would allow ‘limited in-filling’ within this boundary.

I find it hard to reconcile the opening statement of Policy P2 that “We will continue to protect the Metropolitan Green Belt” with this sizeable reduction in effective Green Belt status. In my opinion, this policy represents a de facto extension of the Settlement Boundary and a substantial reduction in the operational effectiveness of the Green Belt, whose effectiveness is significantly weakened where this new planning designation applies.

I accordingly OBJECT to the proposal to designate roads south of the A246 as being within the ‘identified boundary of the village’ and to allow limited infilling within this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1826  Respondent: 15247745 / Brian Aitcheson  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY P2: Green Belt

Local Plan Policy P2 states that: We will continue to protect the Metropolitan Green Belt. We fully and un-equivocally support this policy.

Unfortunately, despite such brave words, GBC appears to be in breach of this policy itself through the housing policies that it has set out in the Local Plan. The analysis included in the Appendix shows that around 65% of the developments proposed in the Proposed Submission Local Plan are to be built on land currently within the Metropolitan Green Belt. We consider this outcome to be outrageous.

Under NPPF rules, GBC is permitted to make allowance for factors which may constrain the delivery of new housing, such as the need to protect the Metropolitan Green Belt or the restrictions required to protect the Surrey Hills Area of Outstanding Natural Beauty (‘AONB’) which is offered protection under the NPPF comparable to that of a national park. Although these areas make up a large proportion of the land area of Guildford Borough, GBC makes no attempt to reduce its housing delivery in order to take account of such constraints. I find this approach inexplicable.

There are also a number of further issues relating to the detailed implementation of this policy which are set out further below:

1. a) Paragraph 4.3.13: Proposal to inset East Horsley from the Green Belt

Policy P2 proposes that East Horsley should be inset from the Green Belt, instead of being ‘washed over’ as it is today. Currently development is permitted within the settlement boundary, although this area is still considered to be Green Belt with a particular planning regime being applicable.

East Horsley is set in a rural location and the village has the look and feel of a rural village. Its Green Belt status has been a key factor in preserving that character. Moreover, being ‘washed over’ by the Green Belt has not been a serious
constraint on development within the village. For example, GBC’s planning records indicate that no less than 149 net new homes were added to the village housing stock through in-filling and brownfield developments between 2000 and 2015.

GBC attributes the need to inset East Horsley to NPPF requirements, arguing that the test for remaining ‘washed over’ is that the village should make an important contribution to the openness of the Green Belt. This East Horsley clearly does. No less than 36% of East Horsley is composed of woodlands, whilst inside the settlement area there is an average housing density of just 8.1 dwellings per hectare (‘dph’). Woodlands and large residential gardens make a vital contribution towards bio-diversity, provide wildlife corridors, and furnish those open spaces which are vital to the character of the greenbelt. It is one thing for a planner to study a map and see a settlement area filled with housing, but it is quite another actually to come to a rural village like East Horsley and see how the Green Belt has preserved the rural character and openness of this village.

Today East Horsley is a picturesque and flourishing rural community, which has and continues to experience steady incremental growth as a result of being ‘washed over’ by the Green Belt. As the saying goes: “If it ain’t broke, don’t fix it”. This applies to East Horsley in the matter of insetting.

I therefore OBJECT to the proposal to inset East Horsley from the Green Belt and request that this proposal be dropped from the Local Plan.

1. **b) Paragraph 4.3.16 and Proposals Map: Settlement Boundary changes in East Horsley**

GBC are proposing to make a number of changes to the settlement boundaries of East Horsley and so expand the settlement area, as set out in the Proposals Map, with the justifications seemingly provided in the Green Belt & Countryside Study prepared by the consultants, Pegasus.

I object to two specific boundary changes, which have been proposed, as follows:

1. There is a proposal to move the East Horsley settlement boundary westwards from behind the houses on the west side of Ockham Road North up to the eastern boundary of Lollesworth Wood. This proposal removes over 5 hectares of agricultural fields from the Green Belt. The present boundary line is clearly defined by a deep and well-maintained drainage ditch which is classified by the Environment Agency as a ‘main river line’ and therefore represents a highly defensible Green Belt boundary.

Moving this boundary west to the edge of woodland in no way improves its defensibility. Under NPPF rules Green Belt boundaries should only be changed in ‘exceptional circumstances’. I do not believe this proposal can be considered as an exceptional circumstance. Clearly the only justification for this change is to bring a large agricultural field within the settlement area in order to provide more housing land. However, under NPPF rules this is not a sufficient justification for changing a Green Belt boundary. As such, I believe it is an invalid proposal.

I accordingly OBJECT to this proposed boundary change.

1. There is also a proposal to move the East Horsley settlement boundary westwards from behind the houses on the west side of Kingston Avenue up to a tree line running along the Parish Boundary at the western edge of Kingston Meadows. The present settlement boundary is clearly defined by a deep and well-maintained drainage ditch running along its eastern side. It therefore represents a very defensible Green Belt boundary. Moving this boundary westwards to the edge of woodland in no way improves its defensibility. Under NPPF rules Green Belt boundaries should only be changed in ‘exceptional circumstances’. I do not believe that this can be considered as an exceptional circumstance. As such we believe this is an invalid proposal.

I accordingly OBJECT to this proposed boundary change.

In the Green Belt & Countryside Study and its accompanying Topic Paper, GBC justifies the need to make changes in settlement boundaries in order to meet unfulfilled housing need in the Borough. However, Green Belt rules make it clear that unfulfilled housing need is not normally considered to be ‘an exceptional circumstance’. If it were the entire Green Belt would already be covered in tarmac.
The NPPF is clear that every movement in settlement boundaries must be justified by ‘exceptional circumstances’. GBC have offered only a generic justification in their Topic Paper of meeting unfulfilled housing need, but a case by case justification has not been provided. As such, I believe the settlement boundary changes referred to above (and many others) are invalid without such detailed justification.

1.  c) Paragraph 4.3.17: Proposal to remove Wisley Airfield from the Green Belt

I OBJECT to the proposal to remove Wisley Airfield from the Green Belt. The only justification for this proposed change is unfulfilled housing need which is not considered an exceptional circumstance. The proposed Wisley development is discussed further below in the Site Allocation section.

1.  d) POLICY P2: Limited In-filling

A new planning designation has been introduced called ‘the identified boundary of the village’. For East Horsley this covers a number of roads south of the A246. It is a sizeable area, covering 45 hectares, the equivalent of 23% of the present Settlement Area of the village. Within this area, Policy P2 sets out proposals that would allow ‘limited in-filling’ within this boundary.

I find it hard to reconcile the opening statement of Policy P2 that “We will continue to protect the Metropolitan Green Belt” with this sizeable reduction in effective Green Belt status. In my opinion, this policy represents a de facto extension of the Settlement Boundary and a substantial reduction in the operational effectiveness of the Green Belt, whose effectiveness is significantly weakened where this new planning designation applies.

I accordingly OBJECT to the proposal to designate roads south of the A246 as being within the ‘identified boundary of the village’ and to allow limited infilling within this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Respondent: 15248321 / Gordon Pipe</th>
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Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

As a local resident in Ockham, I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I write as a resident of East Horsley for over 43 years, and object to the draft Local Plan for the following key reasons:

1. I most strongly object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/1860</th>
<th>Respondent: 15248481 / Jamie McCallister</th>
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To whom it many concern,

I am writing to Guildford Council to express my great concerns on the proposed development of the Green Belt in Surrey.
What give's you the right to remove this land from the green belt?

The NPPF (National Planning Policy Framework) makes it clear that the fundamental aim of the Green Belt policy is to prevent urban sprawl by keeping land permanently open.

It also explicitly states that once established Green Belt boundaries should only be altered in exceptional circumstances.

There are no exceptional circumstances!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!

The whole point of the Green Belt is to stop urban sprawl, your destroying the Green Belt to extend urban sprawl? Insane!

Green Belt Guidelines enclosed as it's obvious you haven't read them.

The UK has voted to leave the EU, so 2.9 million people will be leaving soon, so no reason for all this devastation of the beautiful Surrey Green Belt.

These are pictures taken today of the land proposed to be taken out of the Green Belt for the Housing for Garlick's Arch.

[IMAGE 1]

[IMAGE 2]

2. I object to not protecting the Green Belt (Policy P2)
I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl.

There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

The Plan should develop the existing brownfield sites at Burnt Common rather than developing Garlick’s Arch (A43).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  
- IMAGE 1.jpg (165 KB)  
- IMAGE 2.jpg (153 KB)

1. COMMON OBJECTIONS TO POLICIES A42, A43, A58 & GREEN BELT, POLICY 2 AT PARAGRAPH 4.3.15

I object to the changes to these Policies because:
• Any additional houses and other developments in Send would increase the urbanisation of what is a semi-rural area protected by Green Belt from the closeness of the already built-up Woking Borough.

• The proposed number of new houses and other land appropriation for development adds to what was already an over-development of the area and is a disproportionate allocation of land in the Send Ward within the Borough of Guildford.

• Further developments in the Send Ward will worsen the already chronic problem for vehicle parking for people using the recreational and shopping facilities in Send.

• The prospect of yet more vehicle traffic being added to the minor ‘A’ road (the A247) through Send as this already has high volumes of traffic where the ‘uktrafficflow’ web site shows an average of nearly 14000 vehicles passing along the A247 in Send each day, which has an adverse effect on the quality of life for the residents of Send with congestion, noise, and pollution from vehicle emissions, afflicting the lives of residents. This daily high traffic flow is excessive and must not be increased further by senseless developments.

• There are no commensurate plans or funding to increase the provision of water storage and supply to additional households and commercial facilities in the Affinity Water region, to avoid water shortages in future years.

I object to this Policy change to inset Send Business Park from the Green Belt because:

• The Business Park is an anachronistic legacy which has been allowed to develop in an area of public amenity countryside (adjacent to the unique National Trust property that is the Wey Navigation) which should be not be allowed expand further and destroy the Green Belt and impact upon the amenity value and natural biodiversity of the area forever.

• Such expansion is entirely inappropriate in any event because of the highly restricted nature of Tannery Lane.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
**Comment ID:** PSLPP16/1916  **Respondent:** 15253889 / Carole Gale  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

1. I object to any removal of green belt land
2. I object to ‘in-setting’ of any villages from the green belt

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp171/1737  **Respondent:** 15253953 / Olivia Bedworth  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

Green Belt, Policy 2 at paragraph 4.3.15 I object to the proposal to inset Send Business Park from the Green Belt because:

- It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation
- Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate
- There is highly restricted vehicular access along Tannery Lane in both directions

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/1928  **Respondent:** 15254113 / R Orchard  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object to not protecting the Green Belt (Policy P2)

I object to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick's Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. Rather than developing Garlick's Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.
I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlick's Arch (site A43). There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17656  Respondent: 15256225 / Boyer (Michelle Thomson)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Green Belt Assessment

1.10 Significant limitations in Guildford’s approach to their Green Belt Assessment have been identified. Given the need for the evidence base to be sound, Boyer has carried out an independent assessment of the PDAs and MPDAs around Send and Send Marsh as identified in the Council’s GBCS to supplement the GBCS based on guidance published by the Planning Advisory Service (PAS) and the approach of other Local Planning Authorities. This was provided to Guildford Council on 11th March 2016.

1.11 The full report is included at Appendix Three to these representations (which has been updated to refer to the site allocations within the Proposed Submission Local Plan.)

1.12 First, the GBCS considers that a land parcel either contributes or not to a specific Green Belt purpose (i.e. with the parcel scoring either 1 or 0) without providing any quantification or the degree of that contribution (for example the extent to which a land parcel may make towards a particular Green Belt purpose).

1.13 Second, as a result of this first limitation, the methodology of the GBCS does not allow for any detailed form of ranking to assess the relative contribution each land parcel makes towards the purposes of including land within the Green Belt. The GBCS did not therefore carry out any form of comparative assessment between the identified PDAs/MDPAs.

1.14 Notwithstanding this, the GBCS does identify a number of small PDAs that are considered not to significantly compromise the land parcel score as a whole. These have included sites that have subsequently been proposed as site allocations or safeguarded sites within the previous draft Local Plan (2014) (site references 74-76). Our client’s site was previously identified as safeguarded land (site reference 120).

1.15 Boyer has adopted a scoring methodology to address these issues and quantify the contribution made by each PDA/MPDA towards the purposes of including land within the Green Belt. The aim is to build upon the methodology of the GBCS by enabling a comparison between potential sites already identified through the Local Plan process.
1.16 This approach, together with the sustainability methodology adopted within the GBCS, has been applied to the 11 PDAs/MPDAs surrounding Send, Send Marsh & Burntcommon and Ripley.

1.17 This assessment concludes that the site, at best, makes only a very limited contribution to the purposes of including land within the Green Belt. When compared with the PDAs/MPDAs assessed, it is ranked joint top (i.e. contributes least to the Green Belt) along with land south of Burntcommon. It is considered therefore that its release from the Green Belt would not have any adverse impact on the purpose and function of the Green Belt in this part of the Borough and as such there are no overriding constraints to prevent early delivery of the site.

Previously Developed Land

1.18 The broad approach to removing major previously developed sites from the Green Belt accords with national planning policy and is supported. However, the evidence base to support Guildford’s assumptions about the sites considered to be previously developed appears to be somewhat lacking. There are no details as to the methodology or reasoned justification that has been applied to demonstrate that a site should be considered as previously developed land.

1.19 In the absence of any evidence base being produced by Guildford Borough Council, specific and detailed evidence demonstrating the case for concluding that the site at Send Marsh should be considered to be previously developed land (PDL) was submitted to Guildford Borough Council in February 2016. This report is entitled, ‘Land at Polesden Lane and Send Marsh Road, Send Marsh, Previously Developed Status of Land’ and is attached again at Appendix Four to this representation.

1.20 It is therefore of fundamental importance that the Council demonstrates that the proposed approach with regards to both Green Belt and subsequently previously developed land in the Green Belt is supported by a robust evidence base in order to demonstrate it has appropriately considered all reasonable alternatives to ensure the plan and policies P2: ‘Green Belt’ and D4: ‘Development in urban areas and inset villages’ are sound.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/17660</th>
<th>Respondent: 15256225 / Boyer (Michelle Thomson)</th>
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3.10 Paragraph 79 of the NPPF confirms that, ‘The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.’

3.11 Paragraph 80 then sets out the five purposes of the Green Belt i.e.

- ‘To check the unrestricted sprawl of large built-up areas;
- To prevent neighbouring towns merging into one another;
- To assist in safeguarding the countryside from encroachment;
- To preserve the setting and special character of historic towns; and
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.’

3.12 Paragraph 83 of the NPPF refers to the Green Belt boundaries and sets out that, ‘Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.’
3.13 Paragraph 84 then goes onto say that, ‘When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.’

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/17662</th>
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**Background to Green Belt position**

6.1 Page 22 of Guildford’s Corporate Plan 2015 – 2020 identifies the following action relating to the Green Belt, ‘Protect sensitive greenbelt land and Areas of Outstanding Natural Beauty and designate new SANGS (Suitable Alternative Natural Green Spaces)’.

6.2 The Green Belt and Countryside Study (GBCS) produced by Guildford Borough Council, consisting of 6 volumes (and including the Volume II addendum and re-issue of Volume IV) is a key piece of evidence informing the strategy of this emerging Local Plan. As part of the GBCS, the evidence base now includes a Green Belt sensitivity map, which colour codes parcels of the Green Belt into green, yellow and red, depending on the parcels’ contribution to the green belt, with green meaning a lesser contribution and red meaning the greatest contribution.

**Proposed approach**

6.3 Paragraph 4.4 of the officer report to the Extraordinary Council meeting confirms that, ‘Alongside the detailed considerations carried out as part of the Sustainability Appraisal process, the sensitivity map has been used as a further targeted constraint in arriving at the amended proposal sites…’

6.4 The general approach to the release of land from the Green Belt is supported i.e. an assessment of the existing Green Belt has been undertaken, based on the division of the existing Green Belt into parcels and an assessment made as to the contribution of each of these parcels against the five purposes of the Green Belt as set out in the NPPF.

6.5 It is however critical that this assessment is based on a sound evidence base. As background, the GBCS identified a number of Potential Development Areas (PDAs) and Major Potential Development Areas (MPDAs) for assessment against the purposes of including land within the Green Belt.

6.6 Significant limitations in Guildford’s approach to their Green Belt Assessment have been identified. Given the need for the evidence base to be sound, Boyer has carried out an independent assessment of the PDAs and MPDAs around Send and Send Marsh as identified in the Council’s GBCS to supplement the GBCS based on guidance published by the Planning Advisory Service (PAS) and the approach of other Local Planning Authorities. This was provided to Guildford Council on 11th March 2016.

6.7 The full report is included at Appendix Three to these representations (which has been updated to refer to the site allocations within the Proposed Submission Local Plan. However, it is clear that the GBCS has significant limitations that have been addressed in the report with a view to assisting the Council and strengthening the Local Plan evidence base.

6.8 First, the GBCS considers that a land parcel either contributes or not to a specific Green Belt purpose (i.e. with the parcel scoring either 1 or 0) without providing any quantification or the degree of that contribution (for example the extent to which a land parcel may make towards a particular Green Belt purpose).
6.9 Second, as a result of this first limitation, the methodology of the GBCS does not allow for any detailed form of ranking to assess the relative contribution each land parcel makes towards the purposes of including land within the Green Belt. The GBCS did not therefore carry out any form of comparative assessment between the identified PDAs/MDPAs.

6.10 Notwithstanding this, the GBCS does identify a number of small PDAs that are considered not to significantly compromise the land parcel score as a whole. These have included sites that have subsequently been proposed as site allocations or safeguarded sites within the previous draft Local Plan (2014) (site references 74-76). Our client’s site was previously identified as safeguarded land (site reference 120).

6.11 Boyer has adopted a scoring methodology to address these issues and quantify the contribution made by each PDA/MPDA towards the purposes of including land within the Green Belt. The aim is to build upon the methodology of the GBCS by enabling a comparison between potential sites already identified through the Local Plan process.

6.12 This approach, together with the sustainability methodology adopted within the GBCS, has been applied to the 11 PDAs/MPDAs surrounding Send, Send Marsh & Burntcommon and Ripley.

6.13 This assessment concludes that the site, at best, makes only a very limited contribution to the purposes of including land within the Green Belt. When compared with the PDAs/MPDAs assessed, it is ranked joint top (i.e. contributes least to the Green Belt) along with land south of Burntcommon. It is considered therefore that its release from the Green Belt would not have any adverse impact on the purpose and function of the Green Belt in this part of the Borough.

6.14 The site is adjacent to the village settlement boundary to the north, east and south and is therefore largely within the existing village envelope. The smaller part of the northern boundary, and the western boundary, adjoin fields but these boundaries comprise of strong and mature landscaping.

6.15 Overall, the site is bordered by established housing and defensible boundaries. It therefore has an enclosed character that is visually contained and separate from the wider countryside beyond. Furthermore, the Site’s western boundary does not extend much beyond the western edge of the existing settlement and does not therefore fall clearly within any identifiable gap between Send and Send Marsh.

6.16 The landscape character assessment by FLA (Appendix 5 of our Green Belt Assessment) concludes as follows:

6.17 “The previous land use for Kennels and other sui-generis uses suggest that the areas landscape character relates more to the village fringe than that of the more open land to the west. Therefore, I consider that this is an in-fill site which relates well to the historic field pattern and although the area does lie on the western edge of the village of Send Marsh, it does not form part of the open land to the west which is part of the gap between the two village settlements.”

6.18 The site is easily accessible to a range of facilities within Send and Send Marsh including The Village Medical Centre, St Bede’s Junior School, The Saddlers public house and Send Village Hall. In these terms it compares favourably with other PDAs/MPDAs, especially those surrounding Send Marsh & Burntcommon and Ripley. This combination of good access to facilities and a high degree of separation and containment from adjoining countryside means that the site represents a logical extension to Send Marsh.

6.19 In light of the characteristics of the site and the Council’s recognition that there is a need for Green Belt release to meet the proposed housing target, we consider that the site should be removed from the Green Belt and allocated for new residential development through the emerging Local Plan.

Comparative Assessment

6.20 The table below identifies the eight PDAs at Send Marsh, Send and Ripley as defined within the GBCS. However, this table provides Boyer’s assessment of each site against Green Belt purposes and, using the Boyer methodology, allows their relative contribution against each purpose to be assessed and for the sites to be ranked accordingly.

<see attachments for table 1>

6.21 As stated above, the site is ranked joint top (i.e. contributes least to the Green Belt) along with land south of Burntcommon. We conclude that its release from the Green Belt would not have any adverse impact on the purpose of the Green Belt in this part of the Borough.
6.22 The attached Green Belt assessment highlights the significant limitations within the Council’s GBCS in terms of the methodology used. Our attached Green Belt assessment also adopts a more refined approach to the review of the Green Belt which is considered necessary to make both the assessment and the emerging Local Plan sound.

6.23 Whilst the principal of illustrating how areas meet the Green Belt purposes is welcomed, i.e. through the Green Belt Sensitivity Map, the background information informing this must be robust.

6.24 Our Green Belt Assessment has clearly demonstrated that our site, ‘at best, makes only a very limited contribution to the purposes of including land within the Green Belt.’ It is therefore clear that in order to ensure the soundness of the plan, the evidence supporting the release of Green Belt land and subsequently informing the Green Belt sensitivity map must be revisited and the study updated to take into account the recommendations regarding the revised methodology informing the Council’s Green Belt Assessment.

6.25 Policy P2: Green Belt, sets out that, ‘We will continue to protect the Metropolitan Green Belt, as shown on the proposals map, against inappropriate development…’ As set out in paragraph 85 of the NPPF, ‘When defining boundaries, local planning authorities should…not include land which it is unnecessary to keep permanently open…’

6.26 The inadequacies of the Council’s Green Belt Assessment, as identified within our Green Belt Assessment result in the approach to release of land from the Green Belt being fundamentally flawed and not based on a sound evidence base.

6.27 By revisiting the evidence base to justify the release of land within the Green Belt, as detailed above and adopting the approach as advised which accords with both PAS guidance and best practice, it is clear as robustly demonstrated by our Green Belt Assessment, inter alia, that our site should be removed from the Green Belt.

6.28 In order to ensure the soundness of the plan, it is therefore recommended that the methodology is updated in accordance with our Green Belt Assessment and in accordance with this updated evidence, the Proposals Map illustrating the Green Belt boundaries is updated to reflect these findings.

6.29 In addition to the above Green Belt boundary reviews, there are also some more refined adjustments proposed to the Green Belt boundaries. Paragraph 6.9 of the Guildford Borough Green Belt and Countryside Study summary document, dated January 2013 sets out that,

‘There are some instances where the proposed Green Belt boundaries of a village, as set out in Volume IV, might appear to go beyond the existing built up or settlement boundary, suggesting that a PDA has been assumed to be included. This is not the case. The reason for the proposed Green Belt boundaries sometimes not directly following the built up part of a village, is in order to adhere to the NPPF guidance on such boundary lines. This requires at paragraph 85 that boundaries follow physical features that are readily recognisable and likely to be permanent. As explained at 5.6 above, the inclusion of land within a village boundary that is inset from the Green Belt does not automatically imply that development would be acceptable, with other relevant planning policies still applying to any development proposals.’

6.30 The revised Green Belt boundary around the site at Polesden Lane, Send Marsh does not accord with the above methodology.

6.31 Volume IV of the Greenbelt and Countryside Study assesses the potential for insetting villages across Guildford Borough Council which are currently ‘washed over’ by the Green Belt designation.

6.32 The assessment maps relating to Send Marsh / Burntcommon identify a ‘fence line and treebelt located to the west of Danesfield and to the north of Send Barns Road’. This is identified by Reference 3M.

6.33 Contrary to this statement there is no fence line or tree belt which runs in a diagonal north-west to south east direction across the site.

6.34 The proposed insetting boundary for the Green Belt in this location does not therefore adhere to the NPPF guidance on these boundaries and fails to follow a physical feature which is recognisable or permanent.

6.35 To ensure it is consistent with this approach and follows boundaries that are ‘readily recognisable’, the entire site should therefore be removed from the Green Belt. This approach would also accord with the assessment and conclusions in the Green Belt Assessment carried out by Boyer.
6.36 It is therefore recommended that the Green Belt boundary in this location is adjusted to remove the entire site from the Green Belt and follow physical, recognisable and permanent features as set out in the NPPF. These alterations would help ensure the soundness of the plan and the soundness of policy P2: Green Belt.

Safeguarding land

6.37 Paragraph 4.64 to 4.66 of the Council’s Topic Paper: Green Belt and the Countryside June 2016 sets out the following with regards to safeguarded land:

‘The NPPF is clear that when amending Green Belt boundaries we should have regard to their intended permanence so that they are able to ensure beyond the plan period. In doing so, we should safeguard sites in order to meet longer-term development needs. Safeguarded land is therefore safeguarded for future development, not from development.’

The draft Local Plan (2014) included approximately 200ha of safeguarded land around some of our villages and at one traveller site. As part of reconsidering our spatial strategy, we have looked again at the issue of safeguarding. The NPPF states at paragraph 85 (bullet 3):

‘where necessary, identify in their plans areas of ‘safeguarded land’ between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period’ (emphasis added)

The NPPF is therefore explicit that safeguarded land should be on the edge of the urban area. This is consistent with the fundamental aim of Green Belt policy, which is to prevent urban sprawl. We have therefore considered the extent to which safeguarded land could be identified around Guildford urban area. Given the significant constraints that exist to the north and south of the borough (Thames Basin Heaths Special Protection Area and Surrey Hills Area of Outstanding Natural Beauty), we are left with a ribbon across the central part of the borough that remains potentially suitable for development.

6.38 Paragraph 4.67 then sets out that, ‘Safeguarded land is required in order to ensure that, once amended, Green Belt boundaries need not be reviewed at the end of every plan period. It therefore adds certainty and is consistent with their intended permanence. However, given the nature of our borough and the extent to which constraints limit development opportunities, we no longer consider that safeguarding is appropriate for Guildford. In order to be consistent with the NPPF, any safeguarded land would need to be on the edge of Guildford urban area and would need to be of a sufficient scale to negate the need for a Green Belt review until ‘well beyond the plan period’.

6.39 The ‘urban area’ should not be restricted to Guildford; there are other settlements which are considered to be both sustainable and suitable for development and such settlements, which include Send and Send Marsh should be considered for safeguarding land. Without applying such an approach to safeguarded land it will not be possible to comply with paragraph 83 of the NPPF, which sets out that

‘Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they are capable of enduring beyond the plan period.

6.40 Indeed, Guildford Borough Council has already recognised that the failure to safeguard land is likely to necessitate further Green Belt releases. This position is acknowledged at paragraph 4.70 of the Green Belt and the Countryside Topic Paper, which confirms that, ‘We consider that any future local plan would also need to consider a combination of spatial options if needs were to be met, and is therefore likely to necessitate further Green Belt release around the villages.’

6.41 It is therefore concluded that Guildford’s approach with regards to the safeguarding of land is neither effective nor justified and cannot be considered to be sound.

6.42 Contrary to the position adopted in the Topic Paper, the constraints referred to that are limiting the development opportunities are the very reason that land should be safeguarded. I.e. it is acknowledged that the Green Belt is a significant constraint.

6.43 Furthermore, the safeguarding of land should not apply only to land around Guildford Urban Area, but should be informed by a robust Green Belt Assessment where all settlements are considered, particularly those such as Send Marsh, which has been identified as a large village suitable for growth.
6.44 This is demonstrated in the Guildford Borough Settlement Profiles which states that “due to its proximity and relationship with Send in terms of sharing facilities there is scope for Send Marsh/Burntcommon to support additional housing development in the future through an extension if suitable sites are found.”

6.45 Referring back to the matters addressed above regarding the Green Belt Assessment, it is therefore of fundamental importance that the Council’s Green Belt Assessment follows a robust methodology in order to ensure it has appropriately considered all reasonable alternatives and can identify land to be safeguarded in order to be justified and ensure the plan and policy P2: Green Belt is sound.

Other comments

6.46 The ‘Green Belt and the Countryside’ Topic Paper highlights that two documents were amended/produced to contribute to the Council’s Green Belt and Countryside Study (GBCS). These documents were firstly Volume II addendum, which amended the way that the land parcels were scored in relation to two Green Belt purposes. Secondly it relates to the preparation of Volume V of the GBCS which sought to assess a number of further spatial strategy options.

6.47 Paragraph 4.85 of the ‘Green Belt and the Countryside’ Topic Paper sets out that, ‘Both these documents were published in April 2014, by which stage the spatial strategy for the draft Local Plan had been formed and there was insufficient time to be able to fully incorporate all the findings from the updated evidence.’

6.48 This demonstrates that insufficient regard has been had to all available evidence in formulating the spatial strategy and raises concerns that in fact the approach proposed is not based on a robust evidence base, and is not the best strategy as all reasonable alternatives have not been assessed. Without demonstrating that the proposed approach is supported by a robust evidence base, the plan cannot be said to be sound.

6.49 Policy P2: Green Belt is the main policy addressing Green Belt matters. A significant amount of the proposed policy is devoted to regurgitating national planning policy. This is not necessary and indeed unless all paragraphs are quoted word for word, the meaning as set out in the NPPF then becomes altered, without justification.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17663  Respondent: 15256225 / Boyer (Michelle Thomson)  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Background to Inset Villages

8.1 As set out in paragraph 4.3.12 of the supporting text which accompanies draft Policy P2 of the Proposed Submission Local Plan: Strategy and Sites June 2016 historically all of the villages with the exception of Ash Green and major previously developed sites have been “washed over by the Green Belt designation”.

8.2 With the publication of the National Planning Policy Framework (NPPF) in 2012 however the Government provided clear guidance in respect of the Green Belt and its essential characteristics and purposes.

8.3 In particular Paragraph 86 of the NPPF states that “If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt” (Our emphasis).

The Emerging Local Plan Response
8.4 In response to the NPPF the Council instructed further work to be undertaken in respect of their ‘Green Belt & Countryside Study’ to consider whether villages should be ‘inset’ or ‘washed over’ by the Green Belt designation.

8.5 As set out in draft Policy P2 of the Proposed Submission Local Plan: Strategy and Sites June 2016 the following villages are now proposed to be inset from the Green Belt: Chilworth, East Horsley, Effingham, Fairlands, Flexford, Jacobs Well, Normandy, Peasmarsh, Ripley, Send, Send Marsh/Burnt Common, Shalford, West Horsley and Wood Street Village.

8.6 The approach of the Council to respond to the changes in national policy in respect of the Green Belt designation and to protect these areas using development management policies in accordance with the NPPF are supported.

8.7 Therefore the addition of ‘Policy D4: Development in urban areas and inset villages’ in the latest draft of the Local Plan which seeks to “promote the efficient use of land” whilst ensuring that “this does not negatively impact upon the quality of the local environment” is also supported.

Settlement boundary around the site

8.8 Send Marsh comprises an enclave of established housing closely related to the larger village of Send to the west. The Danesfield development marked a significant change to the character of this part of Send Marsh, introducing a distinct element of estate housing in an area which previously had comprised ribbon housing and non-residential uses.

8.9 As such, the village clearly lends itself to residential development which will rationalise the existing situation creating a long-term defensible boundary without any material outwards projection of built development.

8.10 Land at Polesden Lane and Send Marsh Road, Send Marsh is bordered on three sides by established housing and defensible boundaries including a footpath to the west (footpath number 46) and a second footpath to the north of the site (footpath number 45). It therefore lies within the effective framework of Send Marsh Village although it does not fall within the proposed settlement boundary as defined by the draft Local Plan.

8.11 Paragraph 4.2 of the Green Belt and the Countryside Topic Paper sets out that, ‘Whilst the NPPF broadly represents a continuation of previous policy, there has been a significant change in the policy approach to villages. PPG2 had previously given a choice as to whether villages should remain washed over by the Green Belt or whether they should be inset (removed) from the Green Belt. This is in contrast to the NPPF, which requires that all villages that do not make an important contribution towards the openness of the Green Belt are inset.’

8.12 Paragraph 4.12 of the Topic Paper then confirms that, ‘Volume IV of the Green Belt and Countryside Study (GBCS) in 2012 assesses all of our villages and recommends that the following villages should be inset from the Green Belt:… Send, Send Marsh/ Burnt Common…’

8.13 The Council’s approach with regards to ‘inset villages’ is supported. However, given the evidence presented in previous sections relating specifically to our client’s site at Polesden Lane, Send Marsh with regards to its contribution to the Green Belt and its previously developed land status, the location of the settlement boundary should be re-drawn around the entire site.

8.14 Furthermore, based on the physical characteristics of the site, its usage and its containment it is considered that this site is fundamentally different from the open countryside to the west and north-west.

8.15 The site does not therefore represent pristine, high quality Green Belt land and its previous usage is visible in the character of the site itself and its interrelationship with the surrounding development.

8.16 The inclusion of the site within the settlement boundary would not therefore have any material adverse impact on Green Belt purposes and in particular its openness. The site clearly lends itself to residential development and would rationalise the existing built form creating a defensible village boundary to the west.

8.17 This was demonstrated during the examination of the current Local Plan which was adopted in 2003. As set out in paragraphs 10.4.174 – 10.4.178 of the Inspector’s report the site was put forward on the basis that it had “advantages of being a brownfield site, closely related to a settlement in which there was a reasonable provision of facilities.” The Inspector appeared to agree with this statement noting that “were there a need (for further housing) this site would have features that would make it worthy of consideration.”
8.18 The new Local Plan seeks to identify and meet the needs of the Borough in respect of housing and seeks to provide for the delivery of 13,860 additional homes by 2033.

8.19 As set out above our client’s site would meet this requirement and would provide a proportionate and logical extension to the village whilst contributing to the housing needs of the Borough.

8.20 Whilst the realignment of the Green Belt boundary in relation to the Village of Send Marsh as set out in Section 6 is welcomed, given the evidence presented in previous sections relating to the fact that, at best the site makes only a limited contribution to the Green Belt and evidence demonstrating the previously developed status of the land, in order to ensure the soundness of the plan and policy D4: Development in urban areas and inset villages, the settlement boundary should be redrawn around the entire site.

8.21 The application of the approach in our Green Belt Assessment and evidence presented in our previously developed land report demonstrates that inter alia on the basis the site would provide for more than 25 dwellings that our site should therefore be allocated for residential development. This approach would ensure the soundness of the plan and in particular policies S2: Borough Wide Strategy, P2: Green Belt and D4: Development in urban areas and inset villages.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/1982  **Respondent:** 15256705 / R.V. Vickers  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

1. **I OBJECT to not protecting the Green Belt (Policy P2)**

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/1993  **Respondent:** 15256769 / Freda Boyle  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

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Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I am writing to object to a number of proposals in the revised Guildford Borough Proposed Submission Local Plan. I ask that these objections which are listed below are considered by the Inspector.

I object to all proposals to build on the Green Belt at Send because all the development that is really needed can be accommodated in Guildford's urban brownfield areas and is much closer to existing transport hubs. The whole destruction of the Green Belt in this area is in clear contravention of the central government's stated commitment for Green Belt Protection.

I object to the number of houses that the Plan intends to deliver.

I have further objections which I have listed below:

1. Policy P2. The removal of Send from the Green Belt because the village and its countryside provides a necessary buffer between Woking and Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2009  Respondent: 15256769 / Freda Boyle  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The complete failure of GBC to identify sufficient brownfield sites within the urban which should be targeted first development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1997  Respondent: 15256833 / C J Vickers  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/6694  **Respondent:** 15257217 / Rebecca Armitage  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I wish to register objections to the Draft Local Plan for the following reasons:

1. **GREEN BELT**

The Green Belt is precious and the purpose of the Green Belt is to stop the unrestricted sprawl of large built up areas and prevent neighbouring towns merging.

By removing East and West Horsley from the Green Belt would change the nature of this area of countryside forever and would eventually merge historic and separate villages.

Furthermore, housing, education needs is NOT an exceptional circumstance in law under The National Planning Policy Framework requirements. Under no circumstances should green belt land be used for housing or educational buildings.

We need to preserve the Green Belt for future generations to enjoy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/10155  **Respondent:** 15257217 / Rebecca Armitage  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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We need to preserve the Green Belt for future generations to enjoy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/10470  **Respondent:** 15257281 / Kath Frackiewicz  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
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<td>I object to the overall proposal to remove the villages listed in the above document from the Green Belt, in particular East Horsley, West Horsley, Ockham &amp; Ripley. This is fundamentally against the principles that our countryside is protected from building on and to ensure that there is a balance between houses and open spaces. The Green Belt we have in the Guildford area and particularly around East Horsley, West Horsley, Ockham and Ripley preserves/protects the environment, air quality, helps to prevent flooding and provides open countryside for all to share and enjoy.</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>I object to the Settlement Boundary in Local Plan 2003 being re-drawn in the 2016 Local Plan. The lines as designated in 2003 should remain.</td>
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<td>Green Belt Policy: The proposed plans and changes to the insetting of East &amp; West Horsley as well as the movement of the settlement boundaries of the respective villages is unacceptable and against the policy of having a protected Green Belt.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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Comment ID: PSLPP16/2030  Respondent: 15258401 / Lynda Pullen  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I vehemently object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are already at 100% capacity.

I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

I ask that you please take note of the deep concerns of a huge number of Send residents and indeed many others who are connected to the village, pass through it on a daily and use this area for recreational purposes.

Please would you acknowledge receipt of this letter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2035  Respondent: 15260865 / K M Pearmain  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

There are sufficient brownfield sites to provide the necessary key worker housing so [text unreadable].

I wish to point out that the new development plans require full consultation under Regulation 18. At the moment all plans are invalidated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9785  Respondent: 15262305 / L J Crane  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the removal of 15 villages, including Ripley and Send, from the green belt. This will lead to wholesale, and often inappropriate developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2059  Respondent: 15263073 / James Walker  Agent:
3. I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2092  Respondent: 15264001 / Robert Peake  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

3.1 OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for the proposal to remove Garlick’s Arch, as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the removal of Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7477  Respondent: 15264065 / Roshan Bailey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I absolutely object to the principle of insetting or removal of any of our rural villages from the Green Belt. I object because they are really are of an open character and do make an important contribution to the openness of the Green Belt. In particular, I object to the insetting or removal of Normandy from the Green Belt. Normandy’s name was derived from “no man’s land”, reflecting its character as a collection of rural settlements with significant open land within, between and beyond them. Furthermore, Normandy is renowned for its very special wildlife which is an important part of the Green Belt. It is thus an absolutely crucial part of the “green lung” for maintaining the separation between urban growth. Elsewhere in the draft Local Plan eg Policy P3, the need to avoid the merging of Ash, Tongham and Ash Vale is recognised. It is just as important to ensure that the open character of Normandy’s settlements is maintained, and this can only be done by retaining Normandy fully within the Green Belt.

I also strongly object to the removal of Blackwell Farm and its surrounding fields from the Green Belt. There has to be a limit to step by step encroachment of urban sprawl, and it is entirely inappropriate to downgrade this exceptionally beautiful area which is still actively farmed today and clearly contributing to the openness of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/1055</th>
<th>Respondent:</th>
<th>15264065 / Roshan Bailey</th>
<th>Agent:</th>
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<td>Document:</td>
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I still object to Policy P2 as redrafted since it still does not address a very large proportion of the thousands of objections made to the previous version. I particularly object to the reference in paragraph 1 to the Policies Map: the words “as shown designated on the Policies Map” must be deleted if this paragraph is to be of any use at all. I object to the proposals that the settlements of Normandy, Flexford and Walden Cottages, and the traveller sites to the rear of Palm House Nurseries (A49) and Whittles Drive (A50), should be inset from the Green Belt. These are all areas and sites contributing to the openness of the Green Belt and also contributing to the views to and from the Hogs Back AONB. I also object to the insetting of other villages from the Green Belt and “infilling” of others and wholesale extension of settlement boundaries across the Borough. Such changes ignore the importance of a permanent Green Belt preventing urban sprawl and providing a “green lung” which should be protected, with any individual changes being subjected to rigorous scrutiny and being dependent on clear demonstration of exceptional circumstances justifying any over-riding of the Green Belt provisions. I would also point out that para 4.3.13 is incorrect and misleading in saying that a long list of villages are now inset from the Green Belt – this simply refers to GBC’s proposal last summer, to which there have been huge objections from residents and which we hope will be rejected through the Local Plan process.

I object to the proposals for amendments to the current Green Belt boundaries.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<tr>
<th>Comment ID:</th>
<th>PSLLP16/2119</th>
<th>Respondent:</th>
<th>15264193 / David Hill</th>
<th>Agent:</th>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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I strongly object to the building a possible 6000 new homes on green belt land, we are in Charlock Way Burpham and a development of about 40 new houses and apartments have caused problems in New Inn Lane, and Burnet Avenue with on road parking, trying to get in and out now is very difficult,and dangerous when trying to cross the road and for children walking out in between parked cars, I hope you think very hard about loosing our green belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<th>Comment ID:</th>
<th>PSLLP16/2121</th>
<th>Respondent:</th>
<th>15264225 / Mel McVickers</th>
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2) I object to the proposal to develop the green belt in this area, the removal of the green belt is a ridiculous proposition when first consideration for development should be existing industrial areas and brown field sites. Policy P2
Green Belt Policy 2 at paragraph 4.3.15

I object to the proposal to insert Send Business Park from the green belt because.

1. Huge traffic problems already exist in this area and the proposed development would only increase the problems.
2. As with each of the previous policy objections, this policy will seriously affect the beauty of the green belt in this area, and with diligent investigation the planning authority at Guildford Borough Council should show concern for the loss of the green belt and find sites which will be less affected and are not as attractive for residents.

Green Belt Policy 2 at paragraph 4.3.15

I object to the proposal to develop the green belt in this area, the removal of the green belt is a ridiculous proposition when first consideration for development should be existing industrial areas and brown field sites. Policy P2

Green Belt Policy 2 at paragraph 4.3.15

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concern for the loss of the green belt and find sites which will be less affected and are not as attractive for residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14922  Respondent: 15265377 / Emma Thompson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2537  Respondent: 15265473 / Keith Glenister  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Further to my message yesterday. If this plan goes ahead it will provide a major precedent for other breaches of green belt rules. We have a possible example in the Dilkusha planning application just down our road. It must not go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2131  Respondent: 15265793 / Sam Rowley  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1  I OBJECT TO ALL EROSION OF THE GREEN BELT

6  I OBJECT ANY REMAL OF ANY VILLAGES FROM THE GREEN BELT

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
TO THE PLANNING INSPECTOR

I wish to object to the proposal in the local plan as under:

01 I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

The Plan should develop the existing brownfield site at Burnt Common rather than developing Garlick’s Arch (A43).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Policy P2: Green Belt is the main policy addressing Green Belt matters. A significant amount of the proposed policy is devoted to regurgitating national planning policy. This is not necessary and indeed unless all paragraphs are quoted word for word, the meaning as set out in the NPPF then becomes altered, without justification.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

1.1 This statement has been produced on behalf of Trenfold Property Limited and Countryside Properties (UK) Limited (Countryside) in response to the ‘Guildford Borough Proposed Submission Local Plan: Strategy and Sites (2017)’. Countryside is the contractual purchaser for this site and is able to deliver residential development at the site early on in the plan period. A site location plan is attached at Appendix One.

1.2 Land at Polesden Lane and Send Marsh Road is approximately 2.6ha in size and currently comprises scrub grassland together with spoil and hardstanding associated with the previous uses of the site.

1.3 The site is enclosed on three sides by existing residential development. The site is broadly level and featureless with no significant vegetation within the site. The site benefits from vehicular access from Danesfield suitable to serve the proposed development.
1.4 The western boundary of the site comprises of substantial existing mature vegetation which provides a clear definition to the edge of the site and also a significant level of screening.

1.5 These representations provide our formal response to the changes made by the Council between the 2016 and 2017 versions of the emerging Local Plan and its associated evidence base.

1.6 The representations are structured as follows:
- A summary of key changes made between the 2016 and 2017 versions of the Local Plan;
- Implications of the key changes made to the Local Plan since 2016;
- An assessment of the revised housing numbers proposed in the 2017 version of the Local Plan;
- Consideration of the amended Green Belt boundaries now proposed in the 2017 version of the Local Plan; and
- An overview of our conclusions.

Introduction
1.7 Guildford Borough Council undertook a Regulation 19 public consultation on their emerging Local Plan in June and July 2016.

1.8 It is understood that the Council received approximately 32,000 representations in response to this consultation period which the Council subsequently processed and published in February 2017.

1.9 Following this period of public consultation the Council has made a number of alterations to the Local Plan. Several of these are significant in nature. As a consequence of these amendments the Council is now undertaking an additional period of public consultation.

1.10 This additional Regulation 19 public consultation which commenced on 9th June 2017 is targeted in nature. As such all representations received in respect of the previous 2016 Regulation 19 consultation will still be submitted as part of the Local Plan examination.

1.11 However, in addition to this any representations received in relation to this additional Regulation 19 consultation will also be submitted to the Planning Inspectorate for consideration. This is provided that any additional representations relate to parts of the emerging Local Plan or evidence base which have been amended since the previous 2016 Regulation 19 consultation.

1.12 The following section of these representations therefore provides an overview of the key significant amendments made since the previous Regulation 19 public consultation in 2016. This will inform the matters which can be addressed as part of the targeted consultation currently being undertaken by the Council.

LAND AT POLESDEN LANE AND SEND MARSH

Green Belt Boundary Amendments

3.1 As set out in Section 2 of these representations one of the significant amendments made to the emerging Local Plan since the 2016 consultation is the revision of a number of Green Belt boundaries.

3.2 In a number of instances these revisions relate to the amendments made to site allocations within the Local Plan and reflect the alterations to the OAN proposed mainly as a result of the SHMA Addendum Report.

3.3 However, with regards to Land at Polesden Lane and Send Marsh Road the Green Belt boundary has been revised irrespective of any of these matters.

3.4 The proposed revision to the Green Belt boundary relating to Land at Polesden Lane and Send Marsh Road is illustrated in Amendment 6 of the ‘Send Marsh / Burnt Common’ policies maps.

3.5 The ‘Summary of key changes to the Proposed Submission Local Plan: Strategy and Sites (2017)’ notes that the reason for this amendment is to “ensure the Green Belt follows a defensible boundary”.

3.6 However as set out in Paragraph 85 of the NPPF when reviewing Green Belt boundaries local planning authorities “should not include land which it is unnecessary to keep permanently open”.


3.7 We have demonstrated in our previous representations that the removal of this site from the Green Belt would not have any adverse impact on the purpose or function of the Green Belt in this part of the Borough.

3.8 The Council have failed to address these representations and have failed to demonstrate any sufficient justification for retaining Land at Polesden Lane and Send Marsh Road within the Green Belt.

3.9 Our previous representations make reference to the Planning Advisory Service updated guidance on the preparation of Green Belt Assessments published in February 2015 titled, ‘Planning on the Doorstep: The Big Issues – Green Belt’. On the basis of both the five Green Belt purposes set out at paragraph 80 of the NPPF and the PAS guidance, a boundary should in no way inform or contribute to an assessment as to whether a land parcel meets the Green Belt purposes or otherwise.

3.10 An assessment of the contribution a land parcel makes to meeting the Green Belt purposes should firstly be carried out. Secondly and as necessary, subsequent consideration should be given to where any revised boundary should be located. The boundary assessment should in no way be confused with assessing the contribution a parcel of land makes to the Green Belt purposes.

3.11 Given the conclusions reached in our Green Belt Assessment and the evidence now presented by the Council regarding the boundary of the Green Belt, it appears that Guildford Borough Council has used the location of a boundary to inform their assessment of the site.

3.12 It is therefore considered that Guildford’s approach regarding the Green Belt boundary around our clients’ site has therefore not been justified, and is therefore not sound.

3.13 In light of the substantial requirement for housing delivery sites as established in Section 3 of these representations, we re-assert that this site should be removed from the Green Belt and be allocated for new residential development through the emerging Local Plan.

3.14 Paragraph 4.39 of the Housing Delivery Topic Paper supports this approach noting that “to not amend boundaries would lead to a significant undersupply of homes compared to the identified needs”.

3.15 The Council do acknowledge in their Housing Delivery Topic paper (Paragraph 4.85) that “if major previously developed sites are of sufficient scale and do not possess an open character, it is not considered necessary for them to remain within the Green Belt”.

3.16 However, our previously submitted representations have demonstrated that the site is previously developed land and should therefore be removed from the Green Belt. The Council have nevertheless also failed to respond to these submissions.

3.17 With regards to Green Belt boundaries the NPPF requires local planning authorities to “satisfy themselves that Green Belt boundaries will not need to be altered” and should be defined “clearly, using physical features that are readily recognisable and likely to be permanent”.

3.18 Whilst it is acknowledged that not altering the Green Belt boundary in this location would ensure a defensible boundary the overall assessment of the site (as set out above) is not robust.

3.19 As clearly established by our Green Belt Assessment, the site makes at best, only a limited contribution to Green Belt purposes. As a subsequent and secondary point, the boundary issue would then be considered.

3.20 As we have previously highlighted a defensible boundary for the Green Belt can be established as a result of the removal of the site from the Green Belt owing to the existing site boundaries and substantial vegetation which would provide a clear and permanent boundary in compliance with the NPPF.

3.21 In light of the characteristics of the site and the Council’s recognition that there is a need for Green Belt release to meet the proposed housing target, we consider that in order for the plan to be found sound, the site should be removed from the Green Belt and allocated for new residential development through the emerging Local Plan.

**Flood Risk**

3.22 The Housing Delivery Topic Paper prepared as part of the 2017 public consultation into the Local Plan notes that
“the Proposed Submission Local Plan has given due regard to national flood risk policy, and has not allocated land for housing development that does not accord with the flood risk compatibility table, or pass the sequential test”.

3.23 We have previously highlighted in our earlier representations that our client’s site has been incorrectly given a red ranking against flood risk in the site options appraisal. The Council have been provided with evidence to demonstrate that the site is not at risk of flooding and this ranking is therefore incorrect.

3.24 As illustrated in the flood risk map overlay provided in Appendix 2 and the location plans provided in Appendix 3 all of the proposed residential development can be provided on land which lies within the current Environment Agency Flood Zone 1. As such the site should score a green ranking against flooding and not a red ranking.

3.25 If this inconsistency is corrected then Land at Polesden Lane and Send Marsh Road performs strongly against the Council’s assessment criteria as set out in the sustainability appraisal.

3.26 Despite our representations the Sustainability Appraisal on the Guildford Borough Local Plan which was updated in June 2017 has not incorporated our comments.

3.27 In order to minimise any potential for legal challenge to the Local Plan process, we once again re-iterate that the sustainability appraisal should be revised to take into account the matters raised above and demonstrate how all of the reasonable alternatives have been considered. This is necessary to ensure the soundness of the Plan.

3.28 In addition Countryside has also commissioned a Fluvial Flood Study Report provided in Appendix 3.

3.29 This work addresses the fact that the Environment Agency had previously lacked suitable flood levels for the area in order to inform a Flood Risk Assessment for the site.

3.30 The Report provided in Appendix 3 incorporates hydraulic modelling of the watercourses within the vicinity of the site to determine flood levels and the resulting flood extents.

3.31 The results demonstrate that the site would be entirely situated out of any floodplain up to a 1 in 1000 year return period.

3.32 The site would therefore be entirely positioned within Flood Zone 1 subject to the Environment Agency approving the model.

4.1 These representations have been prepared in response to the Regulation 19 public consultation in respect of the ‘Guildford Borough Proposed Submission Local Plan: Strategy and Sites (2017)’.

4.2 The representations respond directly to the changes made between the 2016 and 2017 versions of the emerging Local Plan and in respect of the new and updated evidence base as required by the targeted consultation.

4.3 Our clients continue to support the commitment of the Council to progress their Local Plan however it is apparent that there are a number of outstanding issues which need to be addressed in order for the Local Plan to be found sound at examination. These points are summarised below.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 170724 Representations (1).pdf (6.9 MB)
Object to proposed Green Belt boundary showing retention of “Land at Hornhatch Farm” as a Green Belt designation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2157  Respondent: 15268545 / Ivan Gale  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1) I object to any development on green belt land.

2) I object to removal of any villages from the green belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2159  Respondent: 15268641 / Sandy Homewood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I wish to register objections to the Draft Local Plan on the following:

Proposed Submission Local Plan: Strategies and Sites June 2016, with regards to the proposed development in East and West Horsley as follows:

Policy P2: Green Belt and the Countryside / Policy P1: Surrey Hills Area of Outstanding Natural Beauty (AONB)

I and many if not the majority of residents of West Horsley are totally opposed to the village's removal from the Green Belt by insetting and extending the 2003 Local Plan Settlement Area boundaries.

There are no exceptional circumstances or other justification is made for the new Green Belt boundaries that will result from the proposed insetting of the two parts of the village from the Metropolitan Green Belt.

West Horsley's defined Settlement Area boundaries (ref 2003 Local Plan) DO NOT need to be extended. West Horsley Parish is one of a rich and varied mix of well-established low housing density settlements with a considerable number of historic buildings. Positioned on the north side of the North Downs, partly in the Surrey Hills AONB, it attracts a considerable number of recreational visitors. Evidence of this is specific with walkers and cyclists, reliving the 2012 Olympic Cycle race and subsequent annual races which is now a feature through this and other local villages.

The Key Evidence document 'Guildford Borough Economic Strategy 2013-2031 makes no case for locating large numbers of homes in West and East Horsley or neighbouring villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2176  Respondent: 15270401 / Lynne and Nick Martin  Agent:
We wish to register objections to the Draft Local Plan. Our reasons are as follows:

1. Green Belt

Our Green Belt is precious. It is what protects London from urban sprawl; it preserves air quality; it prevents flooding; it is the city’s playground. It is for us to conserve and protect it. There are 5 legal purposes for Green Belt, and it meets them all:

- To check the unrestricted sprawl of large built up areas
- To prevent neighbouring towns merging into one another
- To assist in safeguarding the countryside from encroachment
- To preserve the setting and special character of historic towns
- To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/2287  **Respondent:** 15270401 / Lynne and Nick Martin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

We wish to register objections to the Draft Local Plan. Our reasons are as follows:

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- To assist in safeguarding the countryside from encroachment
- To preserve the setting and special character of historic towns
- To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/2192  **Respondent:** 15270625 / Graham White  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? (Yes), is Sound? ( ), is Legally Compliant? ( )**

I support Policy P2 on insetting but do not agree with the proposed boundaries for Effingham - see below where I think the boundary is incorrect and have suggested an alternative.
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<tr>
<th>Comment ID: PSLPP16/16183</th>
<th>Respondent: 15274241 / Chris Finden-Browne</th>
<th>Agent:</th>
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<td>I object to the proposed changes to the Green Belt (policy P2), which would irretrievably change the character and identity of Send. Send and environs are an important 'green lung' between Guildford and Woking.</td>
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<td>As a resident of Chilworth, I strongly object to the idea of Chilworth being removed from green belt status, along with other villages. This would surely allow the fast tracking of more housing development in our village.</td>
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<td>I'm not opposed to development for housing but only in areas where the village infrastructure can cope with an increase in people. This includes traffic measures, doctors, shops. Chilworth cannot accommodate more.</td>
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<td>We object to Policy P2 Green belt.</td>
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<tr>
<td>This policy states, “the general extent of the Green Belt has been retained.” This is a misleading statement. The policy wording is weak in support of the Metropolitan Green Belt even though the latter forms 89% of the borough and should be the cornerstone of all local planning policy. It is precious beyond the short-term demands of the present Government’s policy or a 15-year local plan. As noted under Policy S1 above, it is a solemn legacy to future generations – an asset and amenity that belongs as much to Londoners and the whole nation as to the people who live in it. Once gone it is gone forever.</td>
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Policy P2 completely fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it serves a valuable purpose and it needs to be permanently protected. It was established in a local act of parliament in Guildford under the London Home Counties (Green Belt) Act 1938 and subsequently in the 1944 Greater London Plan to contain the outward sprawl of London. The boundaries of the Green Belt through Guildford Borough were later defined in the 1987 Local Plan, forming part of a 19-24km concentric belt around London. The Green Belt is intended to check the unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and urban land. The principles of the Green Belt designation were outlined within Planning Policy Guidance 2: Green Belts (PPG2) and are found within the National Planning Policy Framework (NPPF). The Metropolitan Green Belt is an example of good planning and the envy of planners throughout the world. Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. Building on it involves high opportunity costs, including an irreversible loss of:

1. Agricultural production. 2. Rural leisure and tourism amenities. 3. Water catchment. 4. Flood control. 5. Biodiversity. 6. Natural heritage. 7. A carbon sink for air pollution. 8. Room for public facilities such as parks and burial grounds. 9. Profitable film locations (e.g. Shere). 10. Future economic potential such as mineral extraction (even fracking). 11. Natural beauty, landmarks, open space, rural views and sight lines. 12. Benefits to public health and wellbeing, physical and psychological (as well expressed in the NPPF). As a matter of law and national and local policy, these assets should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultations. It is quite incorrect to argue, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold. We believe this policy is based on a flawed Green Belt and Countryside Study that, according to one Conservative Councillor, was irregularly commissioned by Council officers without the authority of Councillors.

We object to the removal of over 400 hectares of Green Belt land in and around Blackwell Farm to facilitate further development of Surrey Research Park and for 1800 homes. Over 60 hectares were removed from Green Belt 12 years ago for the same developer (Surrey University) who has yet to fulfill their planning obligations. This valuable land has been squandered with over 17 acres of surface car parking and as one of the key features of Green belt is its 'permanence' this second request for yet more Green Belt land to be released in such a short space of time, with all the outstanding issues that remain makes this all the more objectionable.

Furthermore we object on grounds of the impact this development will have in terms of congestion on our highways, these issues have been highlighted under 'infrastructure'.

We object to the subjectivity of the Green Belt assessment and the inclusion of highly valued areas for development.

We object to the addition of Green Belt to prevent coalescence when areas such as Normandy and Flexford are being merged by development and so are the Horsleys. An area that has a higher landscape value (Blackwell Farm) on the same stretch of land (Hog's Back) is proposed for removal and so the criteria and decision made over Green Belt removal and addition make no sense. We would otherwise support the additional Green Belt but only if there is parity between the various areas of Guildford.

Exceptional circumstances must be outlined and none have. We are also aware of planning permission that has been given locally within Greenbelt where the developer or agent states 'there are exceptional circumstances' yet these are not outlined and approval is given? Policies must be in line with the NPPF and exceptional circumstances but be 'exceptional' which means by definition, 5 strategic sites with the vast majority on Green Belt cannot be 'exceptional'?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2502  Respondent: 15275009 / Compton Parish Council (Fiona Curtis)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
<table>
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<tr>
<th>Comment ID: PSLPP16/2265</th>
<th>Respondent: 15275041 / Cora Dennis</th>
<th>Agent:</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

We object to the inclusion of Greenbelt sites where exceptional circumstances have not been given. Housing need alone has in case law, been overturned and the housing need is highly questionable. We question the soundness of 66% of almost 14,000 homes being proposed on Greenbelt land and whether any circumstances could warrant this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/2262</th>
<th>Respondent: 15275073 / Sean Lightfoot</th>
<th>Agent:</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

I object!

I don't need to comment, you have said it yourself in the opening statement of this document. To prevent urban sprawl! Pot kettle black.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/11910</th>
<th>Respondent: 15275201 / Jennifer Morritt</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object wholeheartedly to the continued destruction of green belt land. The entire idea of the greenbelt is to protect us from becoming a concrete jungle, protecting our wildlife and the natural environment within this country. There is absolutely no exceptional circumstance warranting this land being developed on. Leave it alone.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to not protecting the Green Belt (Policy P2)
I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11622  Respondent: 15275777 / Jason du Preez  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Having carefully considered the GUILDFORD NEW PLANNING DOCUMENTS I would like to STRONGLY OBJECT to the plans as set out.

My greatest concern is the erosion of Greenbelt policy. The very reason we choose to live and raise our families here is in major part due to the connection that the Surrey Hills has with the countryside, green spaces, controlled population density and outdoor leisure activities.

The value of this protection is enormous. We can attempt to attach tangible value to it, but the reality is that it even as we add up the value of all it offers we cannot calculate the intangible value of preserving these bands of green in an ever growing, every more populous and overcrowded land.

It is my STRONG OPINION that Greenbelt should be held sacrosanct. The point of providing this protection is to ensure it is absolute and for all time.

I am not objecting to reasonable planning or appropriate development in the Borough. However, taking villages like Horsley out of the Greenbelt fundamentally alters the character and protections that we hold dear in the places we’ve chosen to live. It seems far more logical to drive more careful thought in the planning and location of urban developments then creating less careful thought for developers who have NO VESTED INTEREST in the community to build on greenfield sites simply because its cheaper and more profitable. It is a complete outrage really.

I particularly protest at the “insetting” of 14 villages from the Green Belt, and at “infilling” 12 Green Belt villages. I STRONGLY OBJECT TO THE FACT THAT settlement boundaries are to be hugely extended in many villages and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are “leggy” in outline, reflecting the effect of ribbon development (often along just one side of existing roads) permitted between the Wars. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and in and of itself invalidates the plan as a whole.

I believe this policy is based on a flawed Green Belt and Countryside Study that was irregularly commissioned by Council officers without the authority of Councillors. To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is just NOT TRUE given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF. IMPORTANTLY, this policy is disproportionate in terms of any foreseeable development requirement.

Our family, friends, community contacts and fellow residents are all in agreement that this needs to be OPPOSED AT ALL COSTS. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.
The policy states that “the general extent of the Green Belt has been retained.” Simply put this is a serious misrepresentation of the facts. If it forms any basis for this policy change, the change is inherently flawed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/17055</th>
<th>Respondent: 15277185 / David Skinner</th>
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I oppose unjustified green belt development. I also think that allowing Green Belt development to pay for transport schemes is a flawed policy, given that it will be the development itself that gives rise to the need for more transport. I disagree with the methodology for parcelling and scoring potential green belt developments - using the number of functions as a scoring method is too narrow and doesn't allow for value judgement over the relative merits. In addition, I don't think the test of 'exceptional circumstances' for Green Belt development has been applied properly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<th>Comment ID: PSLPP16/2332</th>
<th>Respondent: 15278337 / Alastair Rutherford-Warren</th>
<th>Agent:</th>
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Green Belt, Policy P2

The jargon in paragraphs 4.3.11 to 4.3.17 is impenetrable to the lay reader, but in so far as the draft Plan proposes that East Horsley and Wisley Airfield should cease to be within the Green Belt and that the settlement boundaries of the village should be moved, we strongly object and support the position of the East Horsley Parish Council in its opposition.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/17641</th>
<th>Respondent: 15278369 / Ripley Parish Council (Jim Morris)</th>
<th>Agent:</th>
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A disproportionate part of the new housing provision is to be allocated to settlements and adjoining areas in the Green Belt, particularly in the Send/Lovelace Wards of the District.

27. RPC object to other Allocation Policies including:
A25 Gosden Hill Farm
A35 Land at former Wisley Airfield, Ockham
A36 Hotel Guildford Road East Horsley
A37 Land at Bell and Colvill, West Horsley
A38 Land at West Horsley
A39 Land near Horsley Station, West Horsley
A40 Land to the north of West Horsley
A41 Land to the south of West Horsley

28. These proposals together amount to a total of 4533 homes (approximately 35% of the total new housing provision for the whole Borough) within a 3 mile radius of Ripley. As such they are likely to indirectly and directly affect Ripley with the likelihood of traffic and infrastructure problems.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID:</th>
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The approach adopted by the GBC in the Local plan is to exclude land in and surrounding rural settlements from the protection of Green Belt designation by “insetting” of land some of which continues to serve the Green Belt purposes and contributes to the openness of the Green Belt.

40. The approach appears to have taken place as a significant general shift in policy, rather than on the basis of an assessment, in each case, of the extent to which the land in question still serves GB functions.

41. The “exceptional circumstances” required to justify amendment of GB boundaries are not identified.

42. The exclusion of these areas is not in accordance with the guidance in the NPPF.

43. RPC objects to the proposed insetting of rural villages so as to exclude them from the Green Belt protection.

44. There are no exceptional circumstances which justify such an approach and it does not follow or accord with the guidance in the NPPF set out above.

45. This Report is particularly concerned at the following insetting: (1) the insetting of Ripley Village; (2) the Send Marsh/ Burnt Common insetting.

46. There is no change of circumstances or exceptional circumstances which justify the insetting.

47. While RPC objects to the general approach to insetting in principle, it also objects to alignment of the boundary of the insetting, which has been drawn too widely and without proper or any regard to the character of the land to be excluded from the Green Belt or the extent to which it continues to fulfil Green Belt purposes.
48. RPC objects in particular to the insetting of land to the rear of the Talbot and the allocation A45. (above) The land to the rear of the built development behind the Talbot beyond the light industrial buildings is open land and forms a valued part of the rural setting of the village.

49. RPC takes the view that the insetting of Ripley Village has been far too widely drawn. The NPPF para 86 states: “If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt.”

50. Whilst acknowledging that much of the Village of Ripley is in a widely drawn conservation area RPC consider that the open character of the village does make an important contribution to the openness of the Green Belt which justifies retention of its existing Green Belt status.

51. Accordingly RPC objects to the insetting of Ripley from the Green Belt, both in principle and in detail. The Plan is not “sound” in this respect and RPC recommends that the Plan should be modified to retain the village entirely in the Green Belt. If this objection is rejected, and the village is to be inset, the boundary should be drawn more tightly into the existing village built envelope and the paddock are to the rear of The Talbot excluded.

52. RPC objects to the insetting of Send and Burnt Common in general, but particularly objects to the extension of the settlement to exclude the Garlick’s Arch site from the Green Belt and to allocate the land for built development. In the case of Site A43 and Site A43a, Send Marsh/Burnt Common, the insetting of the Garlick’s Arch allocation appears to have no other justification than the very late substitution of the Garlick’s Arch site at the Executive Meeting on 24th May 2016 itself.

53. The site continues to serve a number of the Green Belt purposes and is an important green buffer to the A3 and of ecological and landscape importance.

54. There is nothing stated in the reasoned justification in the Plan to indicate that any exceptional circumstances exist to justify the allocation and the insetting of the Green Belt boundary.

55. It does not appear to have been identified by the process of criteria-based assessment of site through which other sites were identified for allocation and there is no explanation for the substitution of the original A43 allocation “land around Burnt Common Warehouse” which was much more appropriate, given its largely previously developed character.

56. This site which has long been included in the Green Belt has been excluded in the PSLP.

57. RPC accepts the principle of insetting this site as to do so would be consistent with paragraph 85 of the NPPF.

58. However, RPC objects to the inclusion of The Spinney in the area to be inset and submits that the Plan should be modified to as to exclude this area which is adjacent to HMP Send. No exceptional circumstances or change of circumstances have arisen which would justify the insetting of this part of the site, so as to remove its Green Belt protection. RPC consider that the open and undeveloped character of this area distinguishes it from the Prison site and justifies its retention in the Green Belt.

Loss Of Rural Economy
59. RPC considers that Oldlands Field Yard which forms part of the Garlick’s Arch site (A43) and also the barns behind the Talbot (A45) are all excellent examples of successful rural economy sites. There are many very well established and successful businesses housed at these two locations which will be lost.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/18672  Respondent: 15278465 / Chris Wright  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not adress Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2379  Respondent: 15279649 / Martin Stringfellow  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The case for removing the Horsleys from the Green Belt (or “insetting” them) has not been made. They are open in appearance and character and epitomise the areas which Green Belt designation was designed to protect. The insetting will expose them to much weaker development constraints. This is evident in the plan to accommodate 60% more new housing (25% increase) than commensurate with the ONS’ own projections for a 15% population increase in the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2519  Respondent: 15280737 / Miller Developments (David Milloy)  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( No )

It is recognised that the extent of the Green Belt around Guildford represents a particular constraint on development but some Green Belt release is necessary if the Borough is to meet its development needs.

In this context the Council prepared its GBCS to help inform the plan making process, the most recent version of which was published in 2014. This assessed the quality of various sites located adjacent to the existing built up area of Guildford and abutting smaller villages / settlements.

By ranking the various attributes of the sites, taking into account SHLAA returns and making enquiries as to the availability of sites that had previously not been identified the Council published for consultation its Strategy and Sites Document in 2014.

This GBCS has been updated to include, inter alia; an assessment of Wisley Airfield site and other development opportunities which were not considered by the original study.

Based on the revised study, the Council has now further reviewed the release of Green Belt sites and concluded that other than the strategic allocations any development in locations should be concentrated in and immediately adjacent to the existing settlements.

However, the Council has responded to national planning policy and moved away from ‘washing over’ villages with the Green Belt designation and has now ‘inset’, or removed, those villages from the Green Belt that do not contribute to its openness. As a result, the following villages are now inset from the Green Belt: Chilworth, East Horsley, Effingham, Fairlands, Flexford, Jacobs Well, Normandy, Peasmarsh, Ripley, Send, Send Marsh / Burnt Common, Shalford, West Horsley and Wood Street Village. A number of major previously developed sites have also been inset. To facilitate development around Guildford, selected villages and the former Wisley Airfield certain areas have been removed from the Green Belt.

Against this background, Policy P2 reaffirms the usual presumption against ‘inappropriate’ development in the Green Belt, except for those uses identified in the NPPF and appropriately scaled extensions, replacement buildings and limited infilling in identified settlement boundaries.

Miller is concerned that there is no ability to bring forward alternative allocations in the event that the Council fails to meet its housing needs on the larger strategic sites.

In such circumstances, Miller considers that the Council should either reduce the reliance on the strategic sites and allocate a number of small to medium sized allocations (between 100 and 300 dwellings), or should revert to identifying a range of ‘safeguarded sites’ which are capable of being brought forward without delay in the event of a failure by bring forward the strategic allocations; either due to the lack of supporting infrastructure or developer’s concerns about market conditions generally.

In relation to ‘safeguarding opportunities’, the sites previously identified should be reviewed in the context of other sites put forward in response to the 2014 consultation into the Strategy and Sites Document and sites subsequently promoted through the SHLAA.

Miller maintains that safeguarded sites will ensure that should alternative allocations be required the Council will be able to direct development to the most sustainable sites and resist sites being advanced in inappropriate locations.

We also note that whilst the Council has continued to use the spatial hierarchy to inform its allocations, it has also relied on the Sustainability Appraisal (http://www.guildford.gov.uk/media/15039/Volume-I-plus-Appendix-I-and-H---Guildford-Borough-Green-Belt-and-Countryside-Study/pdf/Volume_I_Guildford_Borough_Green_Belt_and_Countryside_Study.pdf) and the Green Belt Sensitivity Assessment (http://www.guildford.gov.uk/newlocalplan/CHttpHandler.ashx?id=16835&p=0). With regard to the latter, Miller recognises the importance of working to preserve the purposes of the Green Belt, but at the same time notes that such a sensitivity assessment can be subjective in terms of if and how the purposes are weighted, particularly as the scoring of whether each parcel meets three or more of the purposes of the Green Belt (thereby being deemed “high sensitivity”) is based on a one sentence statement of supposed fact regarding each purpose. In relation to Miller’s site (H8-C), we
question the validity of the assessment made as to its high sensitivity, as we address this later in this submission.

We are concerned at the inconsistency in the Council’s approach to assessing both the sustainability and sensitivity of Green Belt sites, and how this has led to certain sites being discounted (rejected) in the Land Availability Assessment.

For instance, a number of sites (such as ours – H8-C) have been rejected for the stated reason of “identified in the GBCS but within high sensitivity Green Belt”, yet these two assessments do not consider sites on the same basis. For instance, H8-C had a site-based sustainability ranking of 5 out of 41 in the GBCS, thereby confirming its highly sustainable status.

By contrast, the Green Belt Sensitivity Assessment considered the whole of a wider area known as H8 (which included a far more extensive area comprising H8A, H8B, H8C and the open fields, woodlands and hedgerows stretching down to Wood Street Village). As a result, whilst the key purposes of the Green Belt (such as preventing neighbouring towns from merging into one another) would be prejudiced if the whole H8 area was to be developed, the same conclusion would not be reached if the Green Belt Sensitivity assessment was applied merely to the PDA itself. Against this background the process is considered to be fundamentally flawed and unsound – as it makes a judgement on a potential development area (PDA) based on how the purposes of the Green Belt apply to a much larger area. We have no doubt that the purposes of the Green Belt in relation to PDA H8C (which is what should be considered in relation to the suitability of this parcel of land for Green Belt) are considerably different (i.e. low to medium sensitivity) compared to how the purposes apply to all of H8 when considered as one. This appears to be a consistent theme through the Council’s approach to individual sites, which may have led to some sites being rejected when on their individual merits may have been considered acceptable from both a sustainability and sensitivity perspective.

Miller has further concerns at how the Sustainability Appraisal and the Green Belt sensitivity assessment have been disregarded in relation to the proposed strategic site at Normandy and Flexford. Notwithstanding the fact that there may be a need for a new secondary school (albeit not yet proven), we are not convinced that granting such an exception is consistent with not granting exceptions for other sites that help meet identified wider local needs, such as H8-C. Ignoring the Sustainability Appraisal in relation to the Normandy site is significant, given that the Flexford part (the majority) of this strategic site was given a sustainability ranking of just 34 out of 41, meaning that it was considered to be of low sustainability. Miller believes that the Council would struggle to defend the inclusion of such a site whilst excluding others which have a much higher sustainability ranking (and by virtue of their smaller scale would have a much less significant impact on the Green Belt). In summary, to include a strategic site with a very low sustainability ranking and high sensitivity in the Green Belt whilst excluding others of a much less contentious nature would give rise to challenge on grounds of consistency and soundness.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2496  Respondent: 15282593 / Anne Young  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Green Belt serves a vital function which is necessary for a satisfactory environment for people, wildlife and their ecosystems. I do not agree with any proposal to alter or do away with any of it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10944  Respondent: 15282625 / Kelly Graves  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
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<tr>
<td><strong>I OBJECT TO POLICY P2 (GREEN BELT):</strong></td>
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<tr>
<td>• No declaration of support for protecting the Guildford Green Belt, contrary to NPPF and government statements.</td>
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<tr>
<td>• No evaluation of value of local Green Belt as a public and private asset: it is simply treated as potential building land with a few inconvenient restrictions.</td>
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<tr>
<td>• Impact of Green Belt development on local agriculture ignored.</td>
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<tr>
<td>• Impact on rural leisure and tourism ignored.</td>
</tr>
<tr>
<td>• Impact on flood control ignored.</td>
</tr>
<tr>
<td>• Impact on carbon sink and knock-on effects for air pollution and climate change ignored.</td>
</tr>
<tr>
<td>• Impact on biodiversity ignored.</td>
</tr>
<tr>
<td>• Impact on natural heritage ignored.</td>
</tr>
<tr>
<td>• Impact on water catchment ignored.</td>
</tr>
<tr>
<td>• Impact on room for public space amenities (parks, cemeteries, waste facilities etc) ignored.</td>
</tr>
<tr>
<td>• Impact on rural business (e.g. mineral mining, film making) ignored.</td>
</tr>
<tr>
<td>• Impact on natural landmarks and views ignored.</td>
</tr>
<tr>
<td>• Harm to public health and wellbeing (physical, psychological) ignored.</td>
</tr>
<tr>
<td>• Allows excessive levels of development in breach of views expressed in last consultation and Conservative Party manifesto commitments at the last local elections.</td>
</tr>
<tr>
<td>• Has allowed ruling Councillors to argue that there is an acceptable percentage of Green Belt that should be sacrificed to development, when no such rule exists in the NPPF.</td>
</tr>
<tr>
<td>• Ignores alternative approaches, such as fair burden-sharing under which settlements would undertake to accommodate new development in proportion to their size.</td>
</tr>
<tr>
<td>• Disproportionate amount of development (most of it, in fact) to be in Green Belt. Too few new homes in urban areas where many young people want to live. This will act against much needed urban regeneration.</td>
</tr>
<tr>
<td>• Major settlement extensions allow indiscriminate housebuilding, as irregularly shaped villages are squared off to enclose green fields.</td>
</tr>
<tr>
<td>• Overall harm to Guildford Green Belt unjustified by any objective development need post-Brexit.</td>
</tr>
<tr>
<td>• Ignores most of NPPF 17 stipulations.</td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
</tr>
<tr>
<td>Attached documents:</td>
</tr>
<tr>
<td><strong>Comment ID:</strong> PSLPP16/10968  <strong>Respondent:</strong> 15282625 / Kelly Graves  <strong>Agent:</strong></td>
</tr>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
</tr>
<tr>
<td><strong>I OBJECT TO POLICY I4 (GREEN &amp; BLUE INFRASTRUCTURE):</strong></td>
</tr>
<tr>
<td>• Policy cancelled out by huge developments across the countryside. No mention of opportunity costs of loss of Green Belt services and amenities (e.g. farming).</td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<tr>
<td>Attached documents:</td>
</tr>
<tr>
<td><strong>Comment ID:</strong> PSLPP16/2494  <strong>Respondent:</strong> 15282657 / John Peake  <strong>Agent:</strong></td>
</tr>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )</strong></td>
</tr>
</tbody>
</table>
I wish to object most strongly to the proposal to remove Chilworth from the Green Belt. It is surrounded by an AGLV and the AONB and is seen from the hills along the Tillingbourne Valley. This valley is an extremely attractive area within the Borough and it is very important that the villages along it remain as discrete entities and do not coalesce due to ribbon type development. Hence Green Belt protection for Chilworth is essential.

There is a suggestion that 20 dwellings could be built on land at Old Manor Farm, (Site Ref. 2286). This land is outside the Settlement Boundary, is in the Green Belt and in an AGLV, and is also adjacent to a Conservation Area. It is almost surrounded by Public Footpaths. Hence it is important for the openness of the countryside. The side has no adequate, or wide enough, vehicular access. Thus the proposal to build there is entirely inappropriate.

Tillingbourne Junior School playing fields should remain outside the Settlement Boundary so as to retain their Green Belt protection in the long term. Having been a Governor there for about 30 years I know that the fields are fully utilised but the Governing Body is well aware that many school playing fields have already been sold off.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Objection to the removal of the Green Belt Protection from Peasmarsh, Shalford and Chilworth

I wish to register my objection to your intention to remove 'Green Belt' protection from the villages within the Guildford Borough Council area.

It is well documented that the infrastructure of the area is under considerable strain and that unrestricted housing development of the area is not sustainable.

I therefore object to your 2016 Local Plan proposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2552  Respondent: 15284801 / Linda Jarvis  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

I object to any "in setting" (removal) of any villages from the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2555  Respondent: 15284929 / Sally Vass  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

I wish to register my objection to your intention to remove 'Green Belt' protection from the villages within the Guildford Borough Council area.

The infrastructure of the area is under considerable strain and unrestricted housing development of the area is not sustainable.

I therefore object to your 2016 Local Plan proposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2558  Respondent: 15284993 / Samantha Thompson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

I object to any "in setting" (removal) of any villages from the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. **I object to not protecting the Green Belt (Policy P2)**

I object to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/2573</th>
<th>Respondent: 15285121 / Audrey Boughton</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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<td>1. I OBJECT to not protecting the Green Belt (Policy P2)</td>
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I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not adress Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/2585</th>
<th>Respondent: 15285313 / David Wimblett</th>
<th>Agent:</th>
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</tr>
</thead>
<tbody>
<tr>
<td>A village like Chilworth MUST be kept within the Green Belt.</td>
<td></td>
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</tbody>
</table>

It is beyond belief that the Council could even consider ‘no protection against development’ in Chilworth and our other local villages – Shalford, Peasmarsh, Ripley, etc.

I strongly object to any such plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object to any “in-setting” of any villages from the Green Belt as these spaces should be looked after not built on for future generations can enjoy the local green belt and having to leave extra early to do short journeys like to work, school or for leisure.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPP16/3644  **Respondent:** 15292129 / Shirley Wilson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I writing to object to the 2016 draft local plan to the Send, Wisely, Ripley.

I object to the erosion of the Green Belt around these locations it will spoil the whole feel of the villages and why we choice to live in Send Marsh. Once the green has gone it can’t be brought back.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPP16/3648  **Respondent:** 15292129 / Shirley Wilson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object to any “in-setting” of any villages from the Green Belt as these spaces should be looked after not built on for future generations can enjoy the local green belt and having to leave extra early to do short journeys like to work, school or for leisure.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPP16/2651  **Respondent:** 15293793 / Anita Norman  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

GREEN BELT EROSION - Ripley, Wisley, Clandon and Send should not be removed from the Green Send provides a buffer between Woking and Guildford. The Green Belt was originally formed to avoid amalgamation of villages into towns and towns into cities, by unregulated development or Urban Sprawl. Much has been made in recent years of the plight of certain species of birds and reptiles and destruction of their habitats by development - and yet the Council are exacerbating this process in their wanton desire to take the easy and cheapest option and develop in the Green Belt -
home to a myriad of Flora and Fauna. The Green Belt should be left alone and more use made of existing developed (brown field) land - a prime example being Wisley Airfield.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp171/313  **Respondent:** 15293793 / Anita Norman  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**POLICY P2 – GREEN BELT – SEND BUSINESS PARK OMISSION**

- It is noted in paragraph 4.3.15 that it is intended to inset (exclude) a number of developed sites from the Green Belt, Send Business Park in Tannery Lane being one of them even though there are no ‘Special Circumstances’ put forward to justify this.
- The site is a non-conforming use within the Green Belt however this alone does not justify its exclusion from the Green Belt, in fact there are a myriad of such sites throughout the entire National Green Belt.
- The site is NOT a major developed site within the Green Belt and therefore does not warrant exclusion. The group of existing buildings is not excessive and is surrounded by open fields and the River Wey Navigation therefore the site has an open character (an essential characteristic referred to in Policy P2 paragraph 4.3.12 and 14) and makes an important contribution to the Green Belt.
- If exclusion of this site from the Green Belt designation is intended to promote further development, residential or commercial, then this will only serve to increase the problems of traffic congestion and highway safety along Tannery Lane and its junctions with Polesden Lane and Send Road particularly at peak flow times.

I trust that the above objections are self-explanatory and I would be grateful if the Council and the Planning Inspectorate would carefully consider the points raised in relation to the proposed alterations made to the 2017 Draft Local Plan and in securing a positive future for Guildford Borough and its residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/2654  **Respondent:** 15294113 / M J Hickman  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the plan to remove the protection of Green Belt status from the area proposed in the Plan. Green Belt should be retained, not destroyed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/2662  **Respondent:** 15294241 / Stephen Wootten  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I am writing to show my objection and dismay at the proposed abolition of Green Belt Land around the villages of Chilworth, Shalford, Peasmarsh and surrounding villages. Green Belt land should be reserved for exactly what it says GREEN BELT, the villages are in an area of Outstanding Natural Beauty within the Surrey Hills.

Pollution through extra traffic through the villages and the destruction of wildlife habitat will have a completely detrimental affect on the 'country side'.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2672  Respondent: 15295329 / Matt Sage  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We would urge the council to consider carefully how best to meet the future needs for realistic numbers of homes whilst maintaining Guildford's identity by safeguarding the green belt. Future generations need us to take responsibility for how Guildford is shaped and the current proposal simply sacrifices areas of Greenbelt which is an easy way out with huge future consequences of intense urbanisation and all this brings. Before any decision on the distribution of homes is made we strongly urge the council to make fundamental decisions on the local infrastructure to put in place real and sustainable road and rail plans that are delivered ahead of the inevitable increases in population and vehicles in the coming years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2673  Respondent: 15295425 / Gordon Harris  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Metropolitan Green Belt was set up in 1935 to control urban growth around London. In 1947 this was extended to local authorities in the Town and Country Planning Act. In 1955 the Minister of Housing encouraged local authorities around the country to do the same. Chilworth thankfully is included in this Green Belt, if this were to be removed unscrupulous developers with no other interest other than to make a 'fast buck' and move on would be given access to the land around our villages to cover them in thousands of houses as this would be considered 'approved in principal' outside the Green Belt. No thought as to how our local doctors, schools and road infrastructure should cope has been given, the roads in particular around my village of Chilworth are in a deplorable state requiring total rebuilding in some places not just a splash of Tarmac and a heavy boot to settle it down as seems to be the usual system!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2676  Respondent: 15295713 / Maureen Osmon  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I write to register my objection to the Guildford local plan 2016.

Now more than ever before the green belt is essential to us all. To remove the protection it provides in safeguarding the "lungs" of the country would mean its demise for evermore.

People of all walks of life, all ages, all interests flock to enjoy the advantageous effects it provides. In so doing many small and cottage industries thrive. People use the green belt to walk, cycle, fish. It makes money for transport companies too, and provides opportunities for local schools to provide extra curricular activities cheaply and conveniently.

Obviously I want the green belt to continue to be protected for us all, town and country folk alike but in addition I want any councillors involve to look deep into themselves: please do not remove this protection of the green belt because it's the easiest thing to do; because you can't be bothered to use your heads to think of the alternatives, and most ESPECIALLY because it will fill the council coffers with easy money.

THERE ARE ALTERNATIVES

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2678 Respondent: 15295809 / David Lees Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Green Belt not being protected.

I object to removing Ripley and Send from the Green Belt. With Wisley Airfield (A35) and Garlick’s Arch (A43) and the villages will be be close to merging resulting urban sprawl, which is specifically what the Green Belt is designed to prevent. National Planning Policy requires exceptional circumstances for these villages and sites being removed, and there are none.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2691 Respondent: 15296097 / Sally Hills Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I learn with deep regret that the new "Local Plan" proposes removing the outlying villages south of Guildford from green belt status. As a resident for 39 years of Chilworth I object most strongly to this. The idea of turning these beautiful Surrey villages into housing estates - for what benefit - is preposterous and sheer vandalism.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
The so-called policy of in-setting the villages of Ripley, Send and Clandon is just a euphemism for ignoring their Green Belt status to suit the Borough’s convenience.

These villages are and must remain Green Belt areas.

I write to register my objection to the Guildford local plan 2016. Now more than ever before the green belt is essential to us all. To remove the protection it provides in safeguarding the "lungs" of the country would mean its demise for evermore. People of all walks of life, all ages, all interests flock to enjoy the advantageous effects it provides.

I understand that you have financial issues, however this is entirely of your making due to your short vision proposals. Inefficient spending is plain to see, for example the cheap and poor quality of resurfacing roads, that requires more maintenance and money in the long run. Another example, resurfacing a road and then soon after ripping it up to access the plumbing. Another example, increasing council taxes to a level so high that local businesses cannot survive.

If housing was built in these areas, how do you suggest you will gain access to further capital to pay for the services and maintenance? Its not just a case of getting money from the companies wanting to build and taxes. You will eventually be spending more, its obvious. Sure you will get cash in your pocket initially, but you will soon realise this money has run dry and you will be looking into further short term methods to get a quick buck. It only takes a complete and utter blind idiot to decide that money in the pocket is better than a sustainable and more prosperous future.

There are much more sustainable and creative methods that can be utilised. How about you think logically and try to develop on what we already have? For example, encourage local businesses with lower taxes? If this is mainly a housing issue, try to find better ways of fulfilling your requirements rather than trying to take the quick and easy option. There is no reason why further development in urban areas is a problem. Guildford town is not densely populated and it can be easily argued that its land (especially housing areas) has been used inefficiently, especially considering that its supposed to be the main town or city of Surrey.

Now lets talk about the environmental and ecological effect. You are talking about destroying everything that this planet needs to stop taking for granted, and after a few hundred years of destruction, people are starting to realise this. The environment is not just a canvas for development.

I sincerely hope you don't just count these objections, please read them, every one. People are passionate about this matter.

I write to register my objection to the Guildford local plan 2016. Now more than ever before the green belt is essential to us all. To remove the protection it provides in safeguarding the "lungs" of the country would mean its demise for evermore. People of all walks of life, all ages, all interests flock to enjoy the advantageous effects it provides.

I understand that you have financial issues, however this is entirely of your making due to your short vision proposals. Inefficient spending is plain to see, for example the cheap and poor quality of resurfacing roads, that requires more maintenance and money in the long run. Another example, resurfacing a road and then soon after ripping it up to access the plumbing. Another example, increasing council taxes to a level so high that local businesses cannot survive.

If housing was built in these areas, how do you suggest you will gain access to further capital to pay for the services and maintenance? Its not just a case of getting money from the companies wanting to build and taxes. You will eventually be spending more, its obvious. Sure you will get cash in your pocket initially, but you will soon realise this money has run dry and you will be looking into further short term methods to get a quick buck. It only takes a complete and utter blind idiot to decide that money in the pocket is better than a sustainable and more prosperous future.

There are much more sustainable and creative methods that can be utilised. How about you think logically and try to develop on what we already have? For example, encourage local businesses with lower taxes? If this is mainly a housing issue, try to find better ways of fulfilling your requirements rather than trying to take the quick and easy option. There is no reason why further development in urban areas is a problem. Guildford town is not densely populated and it can be easily argued that its land (especially housing areas) has been used inefficiently, especially considering that its supposed to be the main town or city of Surrey.

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I sincerely hope you don't just count these objections, please read them, every one. People are passionate about this matter.
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<tr>
<th>Comment ID: PSLPP16/2698</th>
<th>Respondent: 15296545 / Catherine Lees</th>
<th>Agent:</th>
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<td>I object to not protecting the Green Belt</td>
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<td>Central government's National Planning Policy Framework requires there to be <strong>exceptional circumstances</strong> for Green Belt boundary changes and for development within the Green Belt. It also states that housing need is not an exceptional circumstance.</td>
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<tr>
<td>I object to removing Ripley and Send from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick's Arch (A43) and the resulting urban sprawl. There are <strong>no exceptional circumstances</strong> for these villages and sites being removed.</td>
<td></td>
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<tr>
<td>The Plan should develop the existing <strong>brownfield</strong> site for light industrial use at Burnt Common rather than developing Garlick's Arch (A43).</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<th>Respondent: 15297217 / Elizabeth White</th>
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<td>I object to any removal of villages in the Green Belt.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<th>Agent:</th>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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</tr>
<tr>
<td>I wish to object to the 2016 Draft Local Plan involving the building of so many new houses in this area. I regard the plan as totally unworkable for the following reasons:</td>
<td></td>
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</tr>
<tr>
<td>1) I object to the loss of green fields, trees and hedgerows to make way for the buildings and associated new roads which will destroy the visual beauty of the area.</td>
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<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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| Attached documents: |
Comment ID: PSLPP16/15476  Respondent: 15297249 / Christine Gates  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to our villages, Ripley, Send, Clandon becoming one conurbation and losing their individual identities like those of Molsey, Walton and Hersham which are indistinguishable and the same with Knaphill, St John's and Goldsworth Park

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2724  Respondent: 15297377 / John Clover  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

subject: local plan shalford,peasmarsh,chilworth

Please note that I object to the plan to remove Green Belt restriction from the above.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2756  Respondent: 15298017 / Margaret Cousins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’) and the land to be taken from the Green Belt. Once taken Green Belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

The Plan should develop the existing brownfield site at Burnt Common rather than developing Garlick’s Arch (A43).

POLICY P2: Green Belt

Local Plan Policy P2 states that: We will continue to protect the Metropolitan Green Belt. I support this policy.

Yet GBC appears to be in breach of this policy itself through the housing policies that it has set out in the Local Plan as around 65% of the developments proposed in the Proposed Submission Local Plan are to be built on land currently within the Metropolitan Green Belt. This is outrageous.

Proposal to inset East and West Horsley from the Green Belt and make Settlement Boundary Changes

I object to these proposals

East and West Horsley are set in a rural location and have the look and feel of a rural villages. Green Belt status has been a key factor in preserving that character. GBC attributes the need to inset East and West Horsley to NPPF requirements, arguing that the test for remaining ‘washed over’ is that the village should make an important contribution to the openness of the Green Belt. This both Horsleys clearly do as around a third is composed of woodlands. Woodlands and large residential gardens make a vital contribution towards biodiversity, provide wildlife corridors, and furnish those open spaces which are vital to the character of the greenbelt. It is one thing for a planner to study a map and see a settlement area filled with housing, but it is quite another actually to come to rural villages like the Horsleys and see how the Green Belt has preserved their rural character and openness.

Today East and West Horsley are picturesque and flourishing rural communities, which continue to experience steady incremental growth as a result of being ‘washed over’ by the Green Belt.

Proposal to remove Wisley Airfield from the Green Belt

I object to the proposal to remove Wisley Airfield from the Green Belt. The only justification for this proposed change is unfulfilled housing need which is not considered an exceptional circumstance.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<tr>
<th>Comment ID: PSLPP16/3534</th>
<th>Respondent: 15299041 / Elizabeth Teece</th>
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</table>

With regard to the 2016 Draft Local Plan I have the following **OBJECTIONS**.

Please show **MY OBJECTIONS** to the Planning Inspector.

Please confirm that you have received my email listing **MY OBJECTIONS** as follows.

1. **I OBJECT to Send Village being removed from the Green Belt.** Local councillors and central government gave a clear election promise to protect the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<table>
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<tr>
<th>Comment ID: PSLPP16/3536</th>
<th>Respondent: 15299041 / Elizabeth Teece</th>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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13. **I OBJECT to the removal of any villages from the Green Belt.**

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<table>
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<tr>
<th>Comment ID: PSLPP16/14212</th>
<th>Respondent: 15299201 / Samira Abdullah</th>
<th>Agent:</th>
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</table>

I object to Policy P2 green belt. This policy states, “the general extent of the Green Belt has been retained.” This is a misleading statement. The policy wording is weak in support of the Metropolitan Green Belt even though the latter forms 89% of the borough and should be the cornerstone of all local planning policy. It is precious beyond the short-term demands of the present Government’s policy or a 15-year local plan. As noted under Policy S1 above, it is a solemn legacy to future generations – an asset and amenity that belongs as much to Londoners and the whole nation as to the people who live in it. Once gone it is gone forever. It is not the Council’s to give away. Policy P2 completely fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it has been around for a long time and it needs to be permanently protected. It was actually established in a local act of parliament in Guildford under the London Home Counties (Green Belt) Act 1938 and subsequently in the 1944 Greater London Plan to contain the outward sprawl of London. The boundaries of the Green Belt through Guildford Borough were later defined in the 1987 Local Plan, forming part of a 19-24km concentric belt around London. The Green Belt is intended to check the unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and other urban land. The principles of the Green Belt designation were outlined within Planning Policy Guidance 2: Green Belts (PPG2) and are found within the National Planning Policy Framework (NPPF). The Metropolitan Green Belt is an exemplar of good planning and the envy of planners throughout the world. Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an
inhabited, working environment that safeguards a certain stock of natural capital. Building on it involves high opportunity costs, including an irreversible loss of:

1. Agricultural production
2. Rural leisure and tourism amenities
3. Water catchment
4. Flood control
5. Biodiversity
6. Natural heritage
7. A carbon sink for air pollution
8. Room for public facilities such as parks and burial grounds
9. Profitable film locations (e.g. Shere)
10. Future economic potential such as mineral extraction (even fracking)
11. Natural beauty, landmarks, open space, rural views and sight lines
12. Benefits to public health and wellbeing, physical and psychological (as well expressed in the NPPF)

As a matter of law and national and local policy, these assets should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultations. It is quite incorrect to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold. I object to the “insetting” of 14 villages from the Green Belt. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost hell bent on self-defeat. I believe this policy is based on a flawed Green Belt and Countryside Study that, according to one Conservative Councillor, was irregularly commissioned by Council officers without the authority of Councillors. To “inset” two thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, although they would quickly destroy them if the proposed “insetting” and boundary extensions go ahead.

I object to the removal of over 400 hectares of Green Belt land in and around **Blackwell Farm** to facilitate further development of Surrey Research Park and for 1800 homes. Over 60 hectares were removed from Green Belt 12 years ago for the same developer (Surrey University) who has yet to fulfill their planning obligations. This valuable land has been squandered with over 17 acres of surface car parking and as one of the key features of Green belt is its 'permanence' this second request for yet more Green Belt land to be released in such a short space of time, with all the outstanding issues that remain makes this all the more objectionable.

Furthermore I object on grounds of the impact this development will have in terms of congestion on our highways, these issues have been highlighted under 'infrastructure'.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<tr>
<td>I object to not protecting the Green Belt. The Green Belt is there to protect our green open spaces for future generations to enjoy as we have done over the years. The environment will be spoilt forever with these large developments if they go ahead. What changes (2016)/further amendments (2017) do you suggest should be made to the document? Attached documents:</td>
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<th>Comment ID: PSLPP16/2825</th>
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</table>
| POLICY P2 – Green Belt We object to this policy. 1. It does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development. 2. The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt 3. Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of green belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done. 4. The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. We believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites. 5. As mentioned above we note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "...the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and we consider this to be a deliberate untruth which compromises the consultation process. We
would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same
distribution as the original statement. (We assume the document was delivered to most houses in the Borough.) We
reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

6. We object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many
of these villages do contribute to the openness of the Green Belt and there is no need to inset them. We also object to the
wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed
outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square
off boundaries by including countryside bounded on only one or two sides by existing development, claiming it
contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The
NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy
makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to
secure the rejection of the plan as a whole.

7. To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of
the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London.
We cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF but this
could quickly be the case if the proposed “insetting” and boundary extensions go ahead. This policy is wildly
disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents.
It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF
provisions.

8. Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” We believe this should be deleted
as an untruth.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. **I object to not protecting the Green Belt (Policy P2)**

I strongly object to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages and the land to be taken from the Green Belt. Once taken the green belt is lost forever. This is one of the reasons I chose to move to Ripley.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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I write to register my objection to the proposal on the above mentioned plan to remove Green Belt protection from the local villages, in particular Chilworth and Shalford.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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In my opinion it is exceptionally sad that the removal of the green belt status has been proposed.

Removal of the green belt and the subsequent urbanisation of our villages and countryside is a one way decision. Once destroyed the countryside is gone forever.

In principal I am not against the development of new homes but it feels like the removal of the green belt and the disproportionate amount of proposed development is being made without any consideration of the infrastructure in our local area. P2

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
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<th>Comment ID: PSLPP16/2888</th>
<th>Respondent: 15301409 / Marian Simonds</th>
<th>Agent:</th>
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<td>Specifically</td>
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<td>1. I OBJECT TO ALL EROSION OF THE GREEN BELT</td>
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<td>2. I OBJECT TO ALL &quot;IN SETTING&quot; OF ANY VILLAGES FROM THE GREEN BELT</td>
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<td>I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being broken.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<tr>
<td>1. GREEN BELT EROSION - Ripley,Wisley,Clandon and Send should not be removed from the Green Belt. Send provides a buffer between Woking and Guildford. The Green Belt was originally formed to avoid amalgamation of villages into towns and towns into cities, by unregulated development or Urban Sprawl. Much has been made in recent years of the plight of certain species of birds and reptiles and destruct ion of their habitats by development - and yet the Council are exacerbating this process in their wanton desire to take the easy and cheapest option and develop in the Green Belt - home to a myriad of Flora and Fauna. The Green Belt should be left alone and more use made of existing developed (brown field) land - a prime example being Wisley Airfield.</td>
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POLICY P2 – GREEN BELT – SEND BUSINESS PARK OMISSION

- It is noted in paragraph 4.3.15 that it is intended to inset (exclude) a number of developed sites from the Green Belt, Send Business Park in Tannery Lane being one of them even though there are no ‘Special Circumstances’ put forward to justify this.
- The site is a non-conforming use within the Green Belt however this alone does not justify its exclusion from the Green Belt, in fact there are a myriad of such sites throughout the entire National Green Belt.
- The site is NOT a major developed site within the Green Belt and therefore does not warrant exclusion. The group of existing buildings is not excessive and is surrounded by open fields and the River Wey Navigation therefore the site has an open character (an essential characteristic referred to in Policy P2 paragraph 4.3.12 and 14) and makes an important contribution to the Green Belt.
- If exclusion of this site from the Green Belt designation is intended to promote further development, residential or commercial, then this will only serve to increase the problems of traffic congestion and highway safety along Tannery Lane and its junctions with Polseden Lane and Send Road particularly at peak flow times.

I trust that the above objections are self-explanatory and I would be grateful if the Council and the Planning Inspectorate would carefully consider the points raised in relation to the proposed alterations made to the 2017 Draft Local Plan and in securing a positive future for Guildford Borough and its residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I strongly object to the 2016 Guildford Draft Local Plan on the following grounds.

1. Loss of Green Belt between Burpham and M25.

The plan does not offer sufficient evidence of exceptional circumstances to justify allocating Green Belt land for strategic developments.

In this plan there is a disproportionate level of development to the north of Guildford and the proposal for Garlicks Arch, Send, Wisley and Gosden Hill Farm will infill the green belt from the northern edge of Burpham right to the M25.

Consequently I object to the loss of Green Belt, especially the land for the Gosden Hill Farm development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2921  Respondent: 15303905 / E Greenhalgh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The comments below represent the issues about which I have some local knowledge and about which I feel strongly.

The Green Belt was originally introduced to prevent ad hoc development and it should still be so other wise England's green and pleasant land will soon disappear.

Guildford is an interesting old town which is surrounded and protected by the Green Belt. In my opinion and that of countless others, this protection should be maintained at all costs. The only people to benefit are the developers.

To suggest that several villages should be taken out of the Green Belt beggars believe.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2925  Respondent: 15304065 / Andrea Mills  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I strongly object to the 2016 Draft Local Plan for the following reasons.

I strongly object to all erosion of the Green Belt. Especially as the electorate in the last local elections were promised that the elected councillors would protect the Green Belt.
I strongly object to any "in-setting" (ie removal) of any villages from the Green Belt. The proposed 2016 Draft Local Plan by these elected councillors will destroy the local villages of which they were elected on their promise to keep the Green Belt currently surrounding these villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to all erosion of the Green Belt.

We need to preserve our Green Belt not destroy it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to all erosion of the Green Belt.

Please keep these villages in the Green Belt and keep them as individual villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/9147</th>
<th>Respondent: 15304705 / Patricia Aberdeen</th>
<th>Agent:</th>
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Loss of green belt – Hope you have the understanding not to ruin the countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/2937</th>
<th>Respondent: 15304737 / Pamela Orthodoux</th>
<th>Agent:</th>
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<td>Comment ID: PSLPP16/2943</td>
<td>Respondent: 15304897 / Richard Baker</td>
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</table>

1. I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not adress Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/2965</th>
<th>Respondent: 15304929 / Rosemary Wood</th>
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</table>

I OBJECT to not protecting the Green Belt.

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council's to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.
The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of only 1.6% of the borough's Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an 'acceptable' percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the council considers that exceptional circumstances exist to justify amendment of Green Belt. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council's growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers' hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of 'About Guildford' (published by the Council) on page 5 states that '... the Plan rejects any schemes that would have a detrimental impact on the Green Belt.' This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the 'insetting' of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openess of the Green Belt and there is no need to inset them. I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the 'openess' of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF's other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To 'inset' two-thirds of the borough's rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough's location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed 'insetting' and boundary extensions go ahead. This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17's aim of 'empowering local people to shape their surroundings' and other NPPF provisions.

Paragraph 4.3.17 states that 'the general extent of the Green Belt has been retained.' I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called 'strategic sites' of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick's Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing does not constitute a 'special circumstance') to be taken from the Green Belt. Once taken from the green belt they will be lost forever.
There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick's Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3004  Respondent: 15312769 / Norah Johnson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

The Plan should develop the existing brownfield site at Burnt Common rather than developing Garlick’s Arch (A43). This is a smaller development in keeping with the local environment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1533  Respondent: 15312769 / Norah Johnson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the extended development in the Green Belt (Policy P2, Site A43)

I object to Garlick’s Arch (A43) being extended and the resulting urban sprawl. There are no exceptional circumstances for this site being removed from the Green Belt, as required by the National Planning Policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3021  Respondent: 15312961 / Alison Johnson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
1. **I object to not protecting the Green Belt (Policy P2)**

I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There are **no exceptional circumstances** for these villages and sites being removed, as required by the National Planning Policy.

The Plan should develop the existing **brownfield** site at Burnt Common rather than developing Garlick’s Arch (A43). This is a smaller development in keeping with the local environment.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
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<tr>
<th>Comment ID: PSLPP16/3036</th>
<th>Respondent: 15313921 / Nicky, Chris and Thomas Wilson</th>
<th>Agent:</th>
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2. **I object to any village being removed from the green belt**

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/3043</th>
<th>Respondent: 15314305 / Andrew Dennis</th>
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1. **I object to not protecting the Green Belt (Policy P2)**

I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There are **no exceptional circumstances** for these villages and sites being removed, as required by the National Planning Policy.

The Plan should develop the existing **brownfield** site at Burnt Common rather than developing Garlick’s Arch (A43).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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</table>

Objection to the removal of the Green Belt Protection from Peasmarsh, Shalford and Chilworth.
I wish to register my objection to your intention to remove 'Green Belt' protection from the villages within the Guildford Borough Council area.

It is well documented that the infrastructure of the area is under considerable strain and that unrestricted housing development of the area is not sustainable.

I therefore object to your 2016 Local Plan proposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Herewith my Objections to the above Plan:**

1. **Green Belt sites**

   I OBJECT to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. This ignores the tens of thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014.

   All Green Belt sites should be removed from the plan until “exceptional circumstances” for development are proven, as stipulated repeatedly in the National Planning Policy Framework (NPPF 2013) which makes clear ‘that most development in the Green Belt is inappropriate and should only be approved in very special circumstances’.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

The Plan should develop the existing brownfield site at Burnt Common rather than developing Garlick’s Arch (A43).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Policy P2. I OBJECT Send should not be removed from the Green Belt


Is states as follows:

"The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence."

Guildford Borough Council is ignoring this wish by the government, given it is a Conservative Council I feel this is showing further disagreement within the Conservative party not required at such time, while also ignoring the wishes of local residents.

I also note that Areas of Outstanding Natural Beauty are ignored for building on, yet Green Belt is, both should be protected or destroyed, that is discriminating against the hidden beauty of the Send area which must be protected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Firstly, as a matter of principle, the Green Belt was intended to protect existing built up areas from encroachment. If pieces are to be taken from it for further building, then there will eventually be no Green Belt left to be encroached upon. Before building plans are even considered a political decision needs to be made as to whether or not we should have Green Belts at all.

An area protected by a Green Belt is totally different from an area which is not so protected. People have moved into this area precisely because it is protected by a Green Belt. If the Green Belt is diminished in any way, then existing residents will have been robbed of a vital property right.

Property rights are an essential part of the Rule of Law. As such they are a political matter, and their diminution is a matter for a political decision. They cannot be taken away as part of some bureaucratic building plan. If the Green Belt is to be diminished, then we need a political decision as to what exactly are the status of Green Belts, and how much, if any, reliance can be placed upon them by the people of this country.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3436  Respondent: 15320737 / Steven Brown  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to POLICY P2 – Green Belt

• No declaration of support for protecting the Guildford Green Belt, contrary to NPPF and government statements.
• No evaluation of value of local Green Belt as a public and private asset: it’s just treated as potential building land with a few inconvenient restrictions.
• Impact of Green Belt development on local agriculture ignored.
• Impact on rural leisure and tourism ignored.
• Impact on flood control ignored.
• Impact on carbon sink and knock-on effects for air pollution and climate change ignored.
• Impact on biodiversity ignored.
• Impact on natural heritage ignored.
• Impact on water catchment ignored.
• Impact on room for public space amenities (parks, cemeteries, waste facilities etc) ignored.
• Impact on rural business (e.g. mineral mining, film making) ignored.
• Impact on natural landmarks and views ignored.
• Harm to public health and wellbeing (physical, psychological) ignored.
• Allows excessive levels of development in breach of views expressed in last consultation and Conservative Party manifesto commitments at the last local elections.
• Has allowed ruling Councillors to argue that there is an acceptable percentage of Green Belt that should be sacrificed to development, when no such rule exists in the NPPF.
• Ignores alternative approaches, such as fair burden-sharing under which settlements would undertake to accommodate new development in proportion to their size.
• Disproportionate amount of development (most of it, in fact) to be in Green Belt. Too few new homes in urban areas where most people (especially the young and less privileged) want to live. This will act against much needed urban regeneration.
• “Insetting” of most villages disproportionate and unjustified in terms of their contribution under the NPPF to the purposes of the Green Belt. Based on flawed Green Belt and Countryside Study. Idea that most Guildford villages do not contribute to “openness” is subjective.
• Major settlement extensions allow indiscriminate housebuilding, as irregularly shaped villages are squared off to enclose green fields.
• Overall harm to Guildford Green Belt unjustified by any objective development need post-Brexit.
• Ignores most of NPPF 17 stipulations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1740  Respondent: 15320737 / Steven Brown  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Green Belt, Policy 2 paragraph 4.3.15 - Send Business Park now taken out of the Green Belt

Taking Send Business Park out of the Green Belt would detract from the openness of the Green Belt and is inappropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3101  Respondent: 15320769 / Emily Case  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I wish to register my objection to your intention to remove 'Green Belt' protection from the villages within the Guildford Borough Council area.

It is well documented that the infrastructure of the area is under considerable strain and that unrestricted housing development of the area is not sustainable.

I therefore object to your 2016 Local Plan proposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3103  Respondent: 15320801 / J.A Sayers  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3508  Respondent: 15321217 / Sally Rule  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to not protecting the Green Belt (Policy P2)
I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3112  Respondent: 15321729 / Fiona Keywood  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object strong to the 2016 New Local Draft Plan.
I object to the erosion of the Green Belt.
I object to the insetting of any villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3114  Respondent: 15321985 / Theo Keywood  Agent: Colin Keywood
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object strong to the 2016 New Local Draft Plan.
I object to the erosion of the Green Belt.
I object to the insetting of any villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3216  Respondent: 15322017 / Colin Keywood  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/3132</th>
<th>Respondent: 15322241 / K. Paulson</th>
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There is no protection for historic green belt land within easy reach for London. It is so important to protect this agricultural recreitional rural countryside

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/3136</th>
<th>Respondent: 15322241 / K. Paulson</th>
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I finally believe that we are custodians of this green belt land. The decisions you make now will desecrate this beautiful countryside for future generations.

Please listen to what are legitimate and logical concerns and understand how strongly locals feel about this.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/3137</th>
<th>Respondent: 15322689 / Lynne Goodfellow</th>
<th>Agent:</th>
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<td>is Sound? ( )</td>
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I am writing to say that I strongly object to the Green Belt status of our area mainly south of the A246 being changed and brought within a newly identified "villiage boundry"

The purpose of the Green Belt was to protect our beautiful villiage and its surroundings. We have a responsibility to keep our rural areas open for future generations who are bound to suffer from these proposed changes. Once these appalling changes are put into place, there will be no going back.

We have a duty to protect our very precious villiage lay out and its countryside.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
Attached documents:

Comment ID: PSLPP16/3138  Respondent: 15322689 / Lynne Goodfellow  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing to you to express my strong objection to the fact that the development of Wisley Airfield with 2000 houses under 2 miles ferom the Horsleys has been included again in the plan.

The A3 road has more traffic than it can cope with already. Our smaller lanes will become congested.

Our local hospitals are already fully stretched

There will be a need for more doctors, therefore we would need more surgeries.

We have no more space to accommodate at least 2000 more cars in our village.

There would be a desperate need for more schools, but, bearing in mind the congested roads, how would we get to them?

Please do not agree to the plans that will eventually spoil the lives of the present residents, who are justly proud of the village that exist today.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3146  Respondent: 15323041 / Jane Doherty  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Local Plan Policy P2 states that: We will continue to protect the Metropolitan Green Belt. I fully and un

support this policy.

Unfortunately, despite such brave words, GBC appears to be in breach of this policy itself through the housing policies that it has set out in the Local Plan. Around 65% of the developments proposed in the Proposed Submission Local Plan are to be built on land currently within the Metropolitan Green Belt. I consider this outcome to be outrageous.

There are also a number of further issues relating to the detailed implementation of this policy which are set out further below:

1.  a) Paragraph 4.3.13: Proposal to inset East Horsley from the Green Belt

Policy P2 proposes that East Horsley should be inset from the Green Belt, instead of being 'washed over' as it is today.

East Horsley is set in a rural location and the village has the look and feel of a rural village. Its Green Belt status has been a key factor in preserving that character. Moreover, being 'washed over' by the Green Belt has not been a serious
constraint on development within the village. For example, GBC's planning records indicate that no less than 149 net new homes were added to the village housing stock through in-filling and brownfield developments between 2000 and 2015.

Today East Horsley is a picturesque and flourishing rural community, which has and continues to experience steady incremental growth as a result of being 'washed over' by the Green Belt. As the saying goes: "If it ain't broke, don't fix it". This applies to East Horsley in the matter of insetting.

I therefore OBJECT to the proposal to inset East Horsley from the Green Belt and requests that this proposal be dropped from the Local Plan.

1. b) Paragraph 4.3.16 and Proposals Map: Settlement Boundary changes in East Horsley

GBC are proposing to make a number of changes to the settlement boundaries of East Horsley and so expand the settlement area, as set out in the Proposals Map, with the justifications seemingly provided in the Green Belt & Countryside Study prepared by the consultants, Pegasus.

We object to two specific boundary changes, which have been proposed, as follows:

1. There is a proposal to move the East Horsley settlement boundary westwards from behind the houses on the west side of Ockham Road North up to the eastern boundary of Lollesworth W. This proposal removes over 5 hectares of agricultural fields from the Green Belt. The present boundary line is clearly defined by a deep and well-maintained drainage ditch which is classified by the Environment Agency as a 'main river line' and therefore represents a highly defensible Green Belt boundary.

Moving this boundary west to the edge of woodland in no way improves its defensibility. Under NPPF rules Green Belt boundaries should only be changed in 'exceptional circumstances'. We do not believe this proposal can be considered as an exceptional circumstance. Clearly the only justification for this change is to bring a large agricultural field within the settlement area in order to provide more housing land. However, under NPPF rules this is not a sufficient justification for changing a Green Belt boundary. As such, I believe it is an invalid proposal.

I accordingly OBJECT to this proposed boundary change.

1. There is also a proposal to move the East Horsley settlement boundary westwards from behind the houses on the west side of Kingston Avenue up to a tree line running along the Parish Boundary at the western edge of Kingston. The result is to take all of Kingston Meadows out of the Green Belt.

Kingston Meadows is the main public recreational space of East Horsley, comprising various sports facilities and playing fields. The present settlement boundary is clearly defined by a deep and well-maintained drainage ditch running along its eastern side. It therefore represents a very defensible Green Belt boundary. Moving this boundary westwards to the edge of woodland in no way improves its defensibility. Under NPPF rules Green Belt boundaries should only be changed in
'exceptional circumstances'. I do not believe that this can be considered as an exceptional circumstance. As such we believe this is an invalid proposal.

I accordingly OBJECT to this proposed boundary change.

In the Green Belt & Countryside Study and its accompanying Topic Paper, GBC justifies the need to make changes in settlement boundaries in order to meet unfulfilled housing need in the Borough. However, Green Belt rules make it clear that unfulfilled housing need is not normally considered to be 'an exceptional circumstance'. If it were the entire Green Belt would already be covered in tarmac.

The NPPF is clear that every movement in settlement boundaries must be justified by 'exceptional circumstances'. GBC have offered only a generic justification in their Topic Paper of meeting unfulfilled housing need, but a case by case justification has not been provided. As such, I believe the settlement boundary changes referred to above (and many others) are invalid without such detailed justification.

1. c) Paragraph 3.17: Proposal to remove Wisley Airfield from the Green Belt I OBJECT to the proposal to remove Wisley Airfield from the Green Belt.

The only justification for this proposed change is unfulfilled housing need which is not considered an exceptional circumstance. The proposed Wisley development is discussed further below in the Site Allocation section.

d) POLICY P2: Limited In-filling

A new planning designation has been introduced called 'the identified boundary of the village'. For East Horsley this covers a number of roads south of the A 246. It is a sizeable area, covering 45 hectares, the equivalent of 23% of the present Settlement Area of the village. Within this area, Policy P2 sets out proposals that would allow 'limited in-filling' within this boundary.

I find it hard to reconcile the opening statement of Policy P2 that "We will continue to protect the Metropolitan Green Belt" with this sizeable reduction in effective Green Belt status. In my opinion, this policy represents a de facto extension of the Settlement Boundary and a substantial reduction in the operational effectiveness of the Green Belt, whose effectiveness is significantly weakened where this new planning designation applies.

I accordingly OBJECT to the proposal to designate roads south of the A246 as being within the 'identified boundary of the village' and to allow limited infilling within this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

The Plan should develop the existing brownfield site at Burnt Common rather than developing Garlick’s Arch (A43).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the removal of areas of Send being removed from the green belt. I am passionate about the countryside surrounding the area in which I live. Without the green belt, we begin to sprawl between Woking and Guildford, turning the area into mere suburbia. The proposed 693 homes per year would inevitably increase. Please do not let this happen.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3246  Respondent: 15326273 / John Haslam  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3248  Respondent: 15326369 / J D W Todd  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT

POLICY P2.

SEND SHOULD NOT BE REMOVED FROM THE GREEN BELT. Send provides a buffer between Woking and Guildford.

The particularly vulnerable areas of land being taken out of the Green Belt include

1. The land behind the school including playing fields and woodland.
2. The land to the right of Cartbridge by the River Wey Navigation up to the new boundary fence with Vision Engineering.
3. Land to the left of Cartbridge going up to the old depot on the Wey Navigation.
4. Land west of Winds Ridge. This will now protrude into the surrounding countryside like a carbuncle whereas before there was a clean straight line behind the Send Hill properties (formed by a footpath) a much more natural boundary.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3263  Respondent: 15326401 / Claire Haslam  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3253  Respondent: 15326465 / James Parker  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

2. I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

The Plan should develop the existing brownfield site at Burnt Common rather than developing Garlick’s Arch (A43).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3264  Respondent: 15326657 / Janet Davie  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

b. Building on Current Green Belt land: I OBJECT to the proposed development of current Green Belt sites at Clockbarn Nurseries, Garlick’s Arch, and Send Hill since there are no special circumstances which justify removal of their Green Belt status.

c. Process: I OBJECT to the failure of Guildford Borough Council to identify sufficient brownfield sites within existing urban areas that should be targeted for development before the open countryside and the Green Belt.

d. Process: I OBJECT to the failure of Guildford Borough Council to include the Town Centre Masterplan 2015 within the overall Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3269  Respondent: 15326785 / James Hampton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the removal of villages from the Green Belt.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10874  Respondent: 15326817 / Peter Jennings-Giles  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I moved to Send Marsh 25 years ago with my wife and young family attracted by it’s rural qualities and the fact that it benefited from protection from major redevelopment by the green belt. I understood that the green belt boundaries would remain intact in perpetuity.

I OBJECT to the removal of 15 villages, including Ripley and Send, from the green belt. This will lead to wholesale, and often inappropriate developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3277  Respondent: 15327137 / Sally Edwards  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3282  Respondent: 15327201 / Sam Philps  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3293  Respondent: 15327521 / Dion Slattery-Hill  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3298  Respondent: 15327681 / Lukesz Romoszewslai  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We object to the village's removal from the Green Belt by insetting and extending the 2003 Local Plan settlements Area boundaries. As such the Green Belt & Countryside Study is flawed
We feel that West Hosley's defined Settlement Area boundaries (ref 2003 Local Plan) DO NOT need to be extended.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6668  Respondent: 15327745 / T S Pilkington and C A Gray  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I would like to object to the proposed mass development in Surrey and on greenbelt for the following reasons:
We should be protecting what little green open spaces we have, not building on them!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3299  Respondent: 15327809 / Nick and Lucy Griffths  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3311  Respondent: 15327873 / Susan Richards  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

POLICY P2 – Green Belt

I OBJECT. This policy states, “the general extent of the Green Belt has been retained.” This is a lie.

The policy wording is tepid in support of the Metropolitan Green Belt even though the latter forms 89% of the borough and should be the cornerstone of all local planning policy. It is precious beyond the short-term demands of the present Government’s policy or a 15-year local plan. As noted under Policy S1 above, it is a solemn legacy to future generations – an asset and amenity that belongs as much to Londoners and the whole nation as to the people who live in it. It is an inalienable public good. Once gone it is gone forever. It is not the Council’s to give away.

Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. Building on it involves high opportunity costs, including an irreversible loss of:

- Agricultural production
- Rural leisure and tourism amenities
- Water catchment
- Flood control
- Biodiversity
- Natural heritage
- A carbon sink for air pollution
- Room for public facilities such as parks and burial grounds
- Profitable film locations (e.g. Shere)
- Future economic potential such as mineral extraction (even fracking)
- Natural beauty, landmarks, open space, rural views and sight lines
- Benefits to public health and wellbeing, physical and psychological (as well expressed in the NPPF)

As a matter of law, morality and national and local policy, these assets should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultations.

It is disreputable to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold. No-one argues that we should sell 1.6% of the Crown jewels in order to build houses.

I am not opposed to appropriate development in the Green Belt and recently supported a major planning application in my own village. But I fail to see why a system of fair burden-sharing of new development cannot be applied to the borough’s existing settlements in proportion to their size. This alternative would minimise the strain on infrastructure and maximise the chances of retaining the character of each settlement through gradual growth. It is reasonable to ask urban Guildford, with x times the population of semi-rural East Horsley for instance, to accommodate x times the number of new homes over the plan period. Parish councils could be asked, and will no doubt be willing, to propose where their
quota of houses should go. Most rural residents are reasonable people who, if not alienated by top-down planners, will support realistic numbers of new houses in their neighbourhoods. Unfortunately, this democratic, bottom-up approach has not been attempted.

Instead, while developers flip and land-bank urban sites as a financial speculation, this plan will dump most new development on greenfield sites where building costs are lower, covering the Green Belt with dozens of housing estates that few residents want. 8,086 new houses are planned for the Green Belt but only 1,135 for Guildford urban area. This is disruptive, socially inequitable and unnecessary. It will not only destroy countryside but will also delay and disincentivise much-needed urban regeneration. The remarkable revival and repopulation of central London shows that building dormitory satellite settlements is an out-of-date approach to planning.

I particularly protest at the “insetting” of 14 villages from the Green Belt, and at “infilling” 12 of the borough’s Green Belt villages. I am deeply disturbed that settlement boundaries are to be hugely extended in many villages and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are “leggy” in outline, reflecting the effect of ribbon development (often along just one side of existing roads) permitted between the Wars. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development.

I believe this policy is based on a flawed Green Belt and Countryside Study that, according to one Conservative Councillor, was irregularly commissioned by Council officers without the authority of Councillors. To “inset” two thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, although they would quickly destroy them if the proposed “insetting” and boundary extensions go ahead. This policy is wildly disproportionate in terms of any foreseeable development need (especially post-Brexit) and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3349  Respondent: 15328833 / Gayle Leader  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to any building on Green Belt Land as this was, initially, created to prevent this type of gross urbanization.
I object to the proposed building on Gosden Hill Farm where the Green Belt was designated to protect West Clandon.
I object to Brown Field Land being used for unnecessary retail expansion when there are empty shops in the High Street.
For future generations, it is essential to keep these open green spaces with less, rather than more pollution.

Attached documents:
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<tr>
<th>Comment ID: PSLPP16/3355</th>
<th>Respondent: 15328993 / B. Joseph</th>
<th>Agent:</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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<th>Comment ID: PSLPP16/3356</th>
<th>Respondent: 15329281 / John Leader</th>
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<td>I object to the proposed building on Green Belt Land as this was created to prevent the spread of housing that linked up the small rural communities turning them into an urban sprawl.</td>
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<td>I object to the proposed building on Gosden Hill Farm where the Green Belt was designated to protect West Clandon as above.</td>
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<td>I object to the scale of the proposed building in the borough as the infrastructure will not support this level of development.</td>
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<td>I object to any reduction in Green Belt land which is vital for children to have an understanding of nature and how this affects mankind.</td>
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<td>For future generations, it is essential to keep these open green spaces with less, rather than more pollution.</td>
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<th>Comment ID: PSLPP16/3357</th>
<th>Respondent: 15329345 / Robin Hurst</th>
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<td>I am not often motivated to write, but I have seldom viewed such poorly thought through local plan.</td>
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<td>I object to the erosion of the Green Belt.</td>
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<td>Why bother to spend all the money and time constructing the Green Belt in the first place, if you can just remove what you wish to at will.</td>
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</table>
It is very sad and ill conceived that the Borough wishes to remove any Surrey Villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/3363</th>
<th>Respondent: 15329409 / Emma Wicks</th>
<th>Agent:</th>
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I object to the removal of villages from the Green Belt.

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<tr>
<th>Comment ID: PSLPP16/3362</th>
<th>Respondent: 15329441 / Suzie Powell-Cullingford</th>
<th>Agent:</th>
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</table>

1. I OBJECT to all insetting of villages from the Greenbelt. It is my fundamental belief that the Metropolitan Greenbelt serves a highly significant role in the preservation of open space and should be rigorously protected for future generations. In particular I refer to my objection of the insetting of the beautiful rural villages of Ripley, West Horsley, East Horsley, Send Marsh/Burnt Common, Chilworth, Shalford, Albury, Shere and Peaslake. It is indefensible that these areas of great beauty in the Surrey Hills should lose their Greenbelt status and there is no clear demonstration of exceptional circumstance to allow this to happen. As a resident of Guildford borough for over 45 years, I can attest to the huge numbers of visitors who regularly walk, ramble and cycle in the countryside of our borough. Many of these visitors are from London and the suburbs and who need fresh air and unrestricted countryside views as an antidote to urban living. Ripley is on the Olympic cycle route and the hugely popular Ride London route. There are thousands of cyclists utilising our country lanes every weekend, enjoying the wonderful countryside. Surely Londoners deserve an escape route too, just an hour away from the confines of the metropolis?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<th>Comment ID: PSLPP16/7772</th>
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The Garlick’s Arch site however is not suitable for development given that it is designated as GreenBelt (Policy P2). The Local Plan clearly states a preference for best utilising previously developed land. Why then has a brownfield site been removed and replaced with a Greenbelt site?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. I object to all insetting of villages from the Greenbelt. It is my fundamental belief that the Metropolitan Greenbelt serves a highly significant role in the preservation of open space and should be rigorously protected for future generations. In particular I refer to my objection of the insetting of the beautiful rural villages of Ripley, West Horsley, East Horsley, Send, Marsh/BurntCommon, Chilworth, Shalford, Albury, Shere and Peaslake. It is indefensible that these areas of great beauty in the Surrey Hills should lose their Greenbelt status and there is no clear demonstration of exceptional circumstance to allow this to happen. As a resident of Guildford borough for over 45 years. I can attest to the huge numbers of visitors who regularly walk, ramble and cycle in the countryside of our borough. Many of these visitors are from London and the suburbs and who need fresh air and unrestricted countryside views as an antidote to urban living. Ripley is on the Olympic cycle route and the hugely popular Ride London route. There are thousands of cyclists utilising our country lanes every weekend, enjoying the wonderful countryside. Surely Londoners deserve an escape route too, just an hour away from the confines of the metropolis?

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<th>Comment ID: PSLPP16/3375</th>
<th>Respondent: 15329569 / P.J Kirkwood</th>
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<th>Respondent: 15330017 / Honor Grear</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>I object to a plan which proposes that over 70% of new housing built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on the protected Green Belt. Election manifesto promises to the electorate are being broken.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<th>Comment ID: PSLPP16/3399</th>
<th>Respondent: 15330945 / Richard Hart</th>
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<td>I object to the 2016 Draft Local Plan, as at last I have been able to view some of the vital elements of the proposals in the document. The main points that I am concerned over is the mass of housing that is proposed in the Green Belts north of Guildford. Each time I read in the local paper on the possible new areas of housing, it states an ever increasing number of new developments allocated in green areas and do not seem to state any proposals south of Guildford. What happened to the original Council concept that you should first build on Brown Field sites and nearer the town centre if possible. All of this development will bring increased pollution not to mention traffic congestion on our local roads especially the A3. No sensible timing has been stated to the building of any new improvements to this busy trunk road prior to the building of</td>
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the new roads and houses near-by. What about the upgrading of utility services to serve the new housing, which will no doubt take months to sort out and may affect any major A3 road improvements that are proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3409  Respondent: 15331393 / Maurice Frayne  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

REMOVAL OF AREAS FROM THE GREEN BELT

The Green Belt was granted to areas to prevent urban sprawl, prevent widespread development, further air pollution and flooding whilst providing areas of relaxation for those who live in the cities. The proposed Local Plan allows for large numbers of new homes and other facilities to be developed in Green Belt areas. The National Planning Policy Framework states that such a development requires exceptional circumstances but the Local Plan does not disclose such needs.

Erosion of the Green Belt as set out in the Local Plan will lead to further urbanisation in the future thus adding even further to the development already proposed.

No changes to the Green Belt should be made unless there are exceptional circumstances.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3418  Respondent: 15331489 / Harry Axten  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3421  Respondent: 15331617 / M.H MacFarlane  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/3424  Respondent: 15331681 / Anne Lowndes  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Comment ID: PSLPP16/3431  Respondent: 15340929 / Claire Smylie  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Comment ID: PSLPP16/3540  Respondent: 15341441 / Gillian Thorpe  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I strongly object to Send Village being removed from the Green Belt. The Green Belt was intended to be permanent, as required by the national Planning Policy Framework, and there are no special circumstances to justify abandoning it. Send’s Green Belt provides an essential buffer stopping Woking and Guildford becoming one conurbation. Local councillors and central government gave a clear election promise to protect the Green Belt and this reneges on it. Developers will be quick to take advantage and there will be nothing to stop them. There is plenty of brownfield land still available for developing in the Surrey area.
Policy 2 paragraph 4.3.15-this proposal would spoil the countryside and the beauty of the Wey Navigation. Large lorries and a high volume of traffics will find it difficult using the small narrow lanes in the area and of course, cause gridlock in Send. Sadly St Bedes School was closed this year and moved to Send First School on the main road through Send. more industrial lorries and traffic will heighten the likelihood of accidents outside the school plus congestion. There is no room for extra traffic and bad planning.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3559  Respondent: 15341729 / Debbie Pollard  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We object to the disproportionate level of development planned in one relatively small area of the borough with a lack of detail regarding the essential infrastructure to support this proposed huge development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3568  Respondent: 15341857 / Lisa Buxton  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We object to Send Village being removed from the Green Belt because:-

- The village provides breathing places for people and for nature.
- We will lose more than just a view, we will lose a space to run or play and an escape from the city.
- We will lose valuable farmland which provides local produce and therefore reduces food miles.
- We lose land that has its own identity and plays its own role in England’s heritage.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3577  Respondent: 15341985 / William Walker  Agent:
1. I OBJECT to Send Village being removed from the Green Belt.

The green Belt was intended to be permanent, per the National Planning Policy Framework and I believe there are no special circumstances to justify abandoning it. Send's Green Belt is an essential buffer between Guildford & Woking stopping it becoming one Urban Mass! Central Government & Local Councillors made a clear election promise to protect the Green Belt and this Plan renegades on the promise given to the electorate. Developers would be quick to seize upon such an opportunity and there would be no policy in place to stop them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3584  Respondent: 15342113 / Jane Carwardine  Agent:

Having objected in 2014 I would like to make my voice heard again in connection with the new proposals for the local plan and how I see it affecting my local environment and community.

1. Removal of the Horsleys from the green belt

I object to removing the Horsley's from the green belt. Our country is very overcrowded already, particularly in the southeast and the green belt was created by some foresighted government to protect the environment around London for all. It should therefore be sacrosanct. It serves as London's lung. We have seen how other policies supposedly to cut carbon emissions by encouraging people to buy diesel cars has now been proven to have made London one of the most polluted cities in Europe. How short sighted governments can be to reach so called targets!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/947  Respondent: 15342305 / Redmond Neale  Agent:

I would like to object the changes to policy P2 for the following reasons:

- I object to the changes to Policy P2 because they have not addressed many of the 32,000 comments made to the 2016 plan.

- I object to the new para (1) “The Metropolitan Green Belt will continue to be protected as shown designated on the Policies Map, against inappropriate development. In accordance with national planning policy, the construction of new development will be considered inappropriate and will not be permitted unless very special circumstances can be demonstrated.” The words “as shown designated on the Policies Map” should be deleted. The Policies Map has effectively ignored huge areas of Green Belt protection and the new para (1) is therefore a sham.
I object to the proposed change that Normandy settlement, Flexford settlement and Walden Cottages should be inset from the Green Belt due to the fact that:

- There is evidence in past planning appeals APP/Y3615/W/15/3002308, APP/Y3615/A/10/2140630 and APP/Y3615/A/10/2131590 that the land here contributes to the “openness” of the Green Belt.

- There is evidence in the Sustainability Appraisal para 10.4.7 that the agricultural land between the settlements is of BMV quality, exhibits ‘openness’ and contributes to the rural economy.

- The land in and around the settlements of Normandy and Flexford contributes to views into and from the Surrey Hills AONB (Hog’s Back).

Policy P2 fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it needs to be permanently protected. The Green Belt is intended to check the unrestricted sprawl of built up areas, to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and other urban land.

Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital.

It is incorrect to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of land that may be removed from the Green Belt.

I object to the statement in the submission Local Plan under Green Belt Policy P2 (4.3.13) which claims that Normandy, Flexford and a further list of 12 villages are “now inset from the Green Belt”. This statement is untrue as GBC is proposing to “inset” these villages. No decision has been made by an Inspector, therefore the villages remain in the Green Belt.

I object to the changed “insetting” of 15 villages from the Green Belt, and at “infilling” 12 of the borough’s Green Belt villages.

I am concerned that settlement boundaries are to be hugely extended in many villages and that infilling is also proposed outside the settlement boundaries of 11 further villages. This is completely unplanned and unmeasured development outside the OAN.

Many Guildford villages are elongated in outline, reflecting the effect of ribbon development (often along just one side of existing roads) permitted between the Wars. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick's Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages, as mere housing need does not constitute a 'special circumstance' for the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC's Green Belt & Countryside Report does not address Garlick's Arch, so there is no evidence base to support including this site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/3611  Respondent: 15342657 / Ann Cameron  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Please taking into account my objections listed below, and draw my objections to the attention of the Planning Inspector.

Green Belt

I object to the proposals to inset from the Green Belt the villages of Send, Send Marsh/Burnt Common, and Ripley, because (given the proposed developments in them, and the huge developments planned close by at Wisley and Gosden Hill Farm), the first three NPPF main guidelines on preserving the Green Belt are not being adequately observed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3606  Respondent: 15342753 / Mike Milne  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to policy P2

Send should not be removed from the Green Belt. Currently Send provides the only buffer between Guildford and Woking. If taken out of the green belt then Guildford would be allowed to merge into Woking. The Green Belt must be protected and preserved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3607  Respondent: 15342753 / Mike Milne  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the erosion of any Green Belt

I object to any "in-setting" of any villages from the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3616  Respondent: 15342753 / Mike Milne  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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I object to policy P2

Send should not be removed from the Green Belt. Currently Send provides the only buffer between Guildford and Woking. If taken out of the green belt then Guildford would be allowed to merge into Woking. The Green Belt must be protected and preserved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3618  Respondent: 15342753 / Mike Milne  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the erosion of any Green Belt

I object to any "in-setting" of any villages from the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3619  Respondent: 15342881 / Caroline Southall  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Stated Government policy is that areas should only be taken out of the Green Belt in exceptional circumstances and you have not demonstrated that those circumstances apply in the case of the Horsleys. It is accepted that on your planning watch you have permitted some infill development in the main East Horsley village, but south of the A246 there have been no extra dwellings in decades. Indeed, you have previously advised us that the Warren and Rowhams Way are in an Area of Outstanding Natural Beauty - i.e. the Surrey Hills. In the circumstances, how can you possibly permit a re-designation from AONB status to a planning free-for-all; that would be an act of quite inexcusable planning vandalism?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3628  Respondent: 15343425 / Pat Owen  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We are writing to object to the proposed submission local plan for the following reasons:-

• Removing Horsley from the Green What exceptional circumstance is this decision based on? Could the Council please be open and honest with the residents as no explanation has so far been made to demonstrate these circumstances.
- Extensions of the boundaries of the settlement area. This surely means that further development will be allowed in the future without referring to the residents. This is either developers being greedy or Guildford Borough Council in terms of future planned income.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th><strong>Respondent:</strong> 15343713 / Sara Frohmader</th>
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<td>I have lived in Send for over 50 years and always enjoyed it's peaceful, semi-rural setting with the green belt acting as a buffer zone between the towns of Woking and Guildford.</td>
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<td>I therefore strongly object to the destruction of the green belt which undermines the Governments commitment for its protection! The sheer number of houses including the industrial units would urbanise and change this area completely!</td>
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<td>I urge you to reconsider the plan which would in turn destroy our village and the surrounding countryside and keep send and send marsh in the green belt.</td>
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<td>Policy P2 - Removal of Send from the Green Belt</td>
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<td>I object to removal of areas of Send village from the green belt. This is all we have as protection against becoming part of Woking and Guildford. It is a lovely haven between the two. If this is removed, the areas will simply merge over time, again spoiling the area. My partner and I will be forced to consider moving away; we chose to live here due to it being away from these urban areas.</td>
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Extension of the boundaries of the settlement areas of the Horsleys & proposed removal of the Horsleys from the Green Belt

I object to the proposed changes. The Greenbelt sites are essential for keeping the air around London clean, acting as a home and refuge for wildlife. The pollution levels in Greater London already far exceed the targets for clean air each year. Removing the surrounding greenbelt sites will only make this worse and the air more heavily polluted. It will also turn our village into essentially just another extension of Great London. To stress the point again, this would have a devastating impact on our air, wildlife, and also the village community here.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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Attached documents:

**Comment ID:** PSLPP16/3685  **Respondent:** 15345025 / John Weaver  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I have lived in West Horsley for 30 years and strongly object to the proposals put forward in the latest Guildford local plan to strip the Horsleys of green belt status and to build 533 high density dwellings. If these proposals go through you will be responsible for significantly and irrevocably destroying the character and appeal of one of Surreys most beautiful villages and declaring open season for further development. The Horsleys were granted Green Belt status to prevent precisely what you are proposing, to ensure that land is not over developed and that green open spaces are provided for people to enjoy. Whilst I understand the need to build more homes we should not be doing it at the expense of villages which add so much to the character, appeal and beauty of the county. The Borough is proud to boast that one of the things which make Guildford great is that 89% of the Borough is Green Belt, so why are you proposing to reduce it? Your proposal in fact does not provide a solid case for removing our green belt status and increasing the West Horsley housing stock by a staggering 35%, greater than any other single area in the Borough. There is certainly no mention of this in the ‘Guildford Borough Economic Strategy 2013 - 2031’ document, so what has changed? I also have not seen proposals to address the drastic effect that the addition of 533 houses will have on local roads, infrastructure, and services, and your proposal to build an additional 2500 homes in the immediate vicinity will make this even worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/3691  **Respondent:** 15345121 / John Fowler  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing to object to the erosion of the green belt within the above plan. The Green Belt Act was brought in to ensure that no further undeveloped land was built on around large suburban areas. This was to ensure that local residents continued to have the opportunity to enjoy the countryside, by car, bicycle, horse or walking. Also to see and observe nature. I am dismayed that the Guildford 2016 Plan proposes reducing the areas for countryside recreation and farming. With the increased population in the area consideration should be given to increasing the green belt so that the density of people to green belt is brought back to what it was when the green belt was first proposed. Again we need more farmland to feed the population not less. Erosion of green belt also means more flooding as there is less land to absorb the run off water.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/3708  **Respondent:** 15345249 / Mark Lewis  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I am writing to lodge a formal objection to the New Local plan 2016 as proposed. I have resided at [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] for over 8yrs with my children attending both the local authority schools within the area.

My first objection is that the Horsley’s should remain in the green belt area, as this is an area of outstanding natural beauty. It is our duty that this is preserved for our children and future residence…once it is gone it can never be brought back and see this as an attack on the green belt and everything this policy stands for.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3722  Respondent: 15345281 / Alexandra Murphy  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick's Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a 'special circumstance' and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban spraw land these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC's Green Belt & Countryside Report does not address Garlick's Arch, so there is no evidence base to support including this site.

Rather than developing Garlick's Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3714  Respondent: 15345377 / Renee Todd  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

As a resident of East Horsley since 1976 I feel I should make my objections known to the proposed building of 533 houses in East and West Horsley. Removing the Horsleys from the Green Belt will be detrimental to the environment, wildlife included and will alter and damage the landscape for no reason after having protected it for over 60 years. It will change forever the ethos of a village life with a community.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3726  Respondent: 15345505 / Alane Smith  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I have studied this subject in some detail and cannot understand why these ridiculous proposals have been put forward. This is not Nazi Germany or a Soviet Socialist Republic, and this is not a simple propaganda exercise. There is no need for you to copy the style of the Referendum debate with a load of unjustifiable facts figures and nonsense.

I demand the resignation of all those responsible for this stupid plan which was bound to result in hundreds of thousands of very reasonable objections.

The Green Belt is laid down in law, it has proved its worth, you have no right to meddle with it. I don’t believe your figures or the expert opinions you quote, other experts have different opinions.

In my objections I am not going into further detail, all the details have been covered by other objectors, but my husband (separately) and I simply object to the whole mess you have made of this job (and will be held responsible for) and we support the West Horsley Paris Council’s objections without exception and in their entirety.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Effingham. Is this to carry on to Guildford and beyond? (1,700 houses are planned for the Guildford end of the Hogs Back and 1,000 new houses on greenfield sites in Normandy.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3766  Respondent: 15347937 / Margaret Brazier  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing to OBJECT most strongly to the proposal to build 385 houses on West Horsley’s Green Belt. Nobody answers the question of who the dwellings are meant for and why West Horsley – out of all proportion to other areas in and around Guildford - has been selected as the victim to endure years of destruction of agricultural land, major equipment carving up the roads, noise and all to add to the already appalling lack of sufficient infrastructure in the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?  

Attached documents:

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Comment ID: PSLPP16/3768  Respondent: 15347937 / Margaret Brazier  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

2. The destruction of the West Horsley Green.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?  

Attached documents:

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Comment ID: PSLPP16/3782  Respondent: 15348033 / Peter Nicholas  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to not protecting the Green Belt (Policy P2).

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and...
the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/3799</th>
<th>Respondent: 15348321 / Vivien Sale</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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<td><strong>Do you consider this section of the document;</strong> complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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</tbody>
</table>

**Green Belt:** the green belt should be protected for future generations. Once built on, it is gone forever.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/3825</th>
<th>Respondent: 15348481 / Donna Styles</th>
<th>Agent:</th>
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<tbody>
<tr>
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<td><strong>Do you consider this section of the document;</strong> complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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</table>

8. **I OBJECT TO – the removal of any Villages from the Green Belt.**

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: pslp171/2075</th>
<th>Respondent: 15348481 / Donna Styles</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
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<tr>
<td><strong>Do you consider this section of the document;</strong> complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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</table>

**I object to the extended development in the Green Belt (Policy P2, Site A43)**

I object to Garlick’s Arch (A43) being extended and the resulting urban sprawl. There are no exceptional circumstances for this site being removed from the Green Belt, as required by the National Planning Policy.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: pslp171/1346</th>
<th>Respondent: 15348513 / Daniel Marshall</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
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<tr>
<td>Comment ID: PSLPP16/3829</td>
<td>Respondent: 15348641 / Clare Bennett</td>
<td>Agent:</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td>I wish to register my concerns with regard to the Guildford Local Plan, open to consultation until July 18th 2016.</td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td>Attached documents:</td>
</tr>
</tbody>
</table>

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<tr>
<th>Comment ID: PSLPP16/3836</th>
<th>Respondent: 15348705 / Richard Shaw</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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</tr>
<tr>
<td>The draft Local Plan proposes to remove significant parts of the villages from the Green Belt. Deletion of the Green Belt requires exceptional circumstances to be demonstrated. They have not been demonstrated.</td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td>Attached documents:</td>
</tr>
</tbody>
</table>

<table>
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<tr>
<th>Comment ID: PSLPP16/3858</th>
<th>Respondent: 15348929 / Rosemary Poile</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td>I strongly object to GBC’s proposal to remove Green Belt Protection from a number of villages including Chilworth. We need to protect against development.</td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
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<tr>
<td>Comment ID: PSLPP16/3872</td>
<td>Respondent: 15349217 / Philip Cole</td>
<td>Agent:</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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</table>

I am writing to object most strongly to the proposal to build a disproportionate number of new houses on a minimum of six larger plots, and a number of smaller ones, of green belt land, in East and West Horsley villages. My reasons are as follows:

1. The Green Belt and the Countryside police states that the green belt will be protected against inappropriate development, and Guildford BC has not stated the exceptional circumstances or other justification for moving the green belt boundaries as proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/2282</th>
<th>Respondent: 15349217 / Philip Cole</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
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</table>

I am writing to express my objections to the 2017 changes to the Local Plan.

The reduction in the number of new homes proposed in the Green Belt does not go far enough in reducing the still substantial number of new homes proposed on green belt land.

The eastern side of the borough is now scheduled to take an even greater proportion of new homes in the Green Belt.

It is unacceptable that Guildford is choosing not to constrain its overall housing growth, as many other Councils have done, to protect Green Belt. The objectively assessed housing target, though reduced since 2016 to 12466 homes, will by 2034 mean that Guildford will have grown by nearly 25%. This is nearly double the ONS’ prediction for the growth of Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/3879</th>
<th>Respondent: 15349281 / Steve Aptel</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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</table>

1. I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional
circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute e a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13640  Respondent: 15349281 / Steve Aptel  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute e a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3892  Respondent: 15349505 / C Erhardt  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

destruction of the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5637  Respondent: 15349505 / C Erhardt  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I am writing in relation to the Guildford Borough's most recent Local Plan for the Horsley Area, which we find quite disturbing and completely unacceptable in most areas. Whilst we do not object to a modest addition of a few houses, it is quite improper and wholly without basis to withdraw the Horsley's from the Green Belt, especially as it was designed specifically to stop such plans for what seems to be convenience.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I wish to object most strongly to this Plan to turn Wisley Airfield into a "new settlement of 2100 dwellings", for the following reasons:

1. This is Green Belt and there are no 'special circumstances' to be argued in favour of development.

   1. A development of this size, leading to urban sprawl, is totally inappropriate and not the solution to the provision of more housing, which should only be by small growth utilising brownfield sites where possible.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5220  Respondent: 15349761 / John Kettle  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Green Belt

There is a government defined policy that Green Belt land can only be built on "in exceptional circumstances". Indeed the GBC Local Plan includes the statement "We will continue to protect the Green Belt". The Local Plan proposes extensive use of Green Belt land and makes no case for "exceptional circumstances". GBC is proposing new settlement boundaries for East Horsley encompassing Green Belt land so that new houses can be built in a re-defined village settlement. In addition GBC is proposing a new extended boundary described as "the identified boundary of the village". This is in an area currently protected by Green Belt. There are no "exceptional circumstances" defined for any of the re-drawing of the settlement area. East Horsley is set in a rural location and the Green Belt has preserved the whole character and openness of this village. A recent East Horsley village survey indicated that 88% of the residents wished to see this maintained. GBC has proposed two sites for development in East Horsley (Thatchers 48 houses and Ockham Road North 100 houses). Both of these would be using Green Belt land, and in addition would be at a density quite out of keeping with the density of local housing. GBC has also stated that 3 further sites, identified as LAA sites, should be considered as potential development sites. These are again on Green Belt land. I should like to make the point that identifying these LAA sites is by no means easy as GBC does not include them in the ir Local Plan proposals and therefore the general public is not aware of these extra sites unless they know where to look. In my opinion this is a devious and disgraceful way for the Council to behave.

I object to any Housing development that makes use of Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3931  Respondent: 15350081 / Tania Parslow  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
I am writing to state my objections to the current plans for development at Send.

Only today, Theresa May, as our new Prime Minister, reiterated her government’s commitment to protecting our Green Belt yet Guildford Borough Council seems to be committed to allowing vast expansion of our village to a point where it is in danger of losing its distinction and merging with Woking and Guildford. Once we lose our countryside it is lost forever and remains brownfield. With great advances in civil engineering and smart materials, surely there are more efficient ways of managing brownfield spaces in order to avoid this urban sprawl.

I shall outline my specific areas of objection:-

Firstly, I object to Send village being removed from the Green Belt as this was intended to be a permanent categorisation in order to protect our land from unscrupulous developers and those who might place financial interests over environmental concerns. We must retain Send’s village identity and prevent urban sprawl and loss of our countryside forever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
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<tr>
<th>Comment ID: PSLPP16/3956</th>
<th>Respondent: 15350465 / Shirley Dicker</th>
<th>Agent:</th>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>The villages must not be destroyed and the Green Belt should remain.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<tr>
<th>Comment ID: PSLPP16/3967</th>
<th>Respondent: 15350561 / Janet Riddiford</th>
<th>Agent:</th>
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<tr>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<tr>
<td>4, We have very precious green belt around Guildford which is enjoyed by thousands not only from the local area but from much further afield including the London area. We should look after this valuable asset because once it is destroyed it will be gone for ever.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<tr>
<th>Comment ID: PSLPP16/3978</th>
<th>Respondent: 15350625 / Jenny Schneider</th>
<th>Agent:</th>
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<tr>
<td>I am writing to let you know that I object to the proposed removal of Green Belt protection from Chilworth. The Green Belt is a very important principal for the containment of urban development and protection of green space to the benefit of a very large number of people. I am very concerned that this is being contemplated and urge you to rethink.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<tr>
<th>Comment ID: PSLPP16/3981</th>
<th>Respondent: 15350689 / Brian Peed</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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</table>
Please see my comments below regarding Guildford Borough Council’s Local Plan. I should be grateful if you would please forward these to the Planning Inspector for his consideration. I request an acknowledgement to this email.

I OBJECT to Send Village being removed from the Green Belt. The Green Belt was intended to be permanent, as required by the National Planning Policy Framework and there are no special circumstances to justify abandoning it. Send’s Green Belt provides an essential buffer stopping Woking and Guildford becoming one conurbation. Local councillors and central government gave a clear election promise to protect the Green Belt and this reneges on it. Developers will be quick to take advantage and there will be nothing to stop them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3986  Respondent: 15350753 / Linda Bassett  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Guildford Borough Proposed Submission Local Plan Strategy and Sites, June 2016, proposed strategy that in excess of 65% of the proposed residential development be built within the Green Belt. The National Planning Policy Framework (NPPF) requires the provision of exceptional circumstances to justify alteration of the Green Belt Boundary. The Council has failed to provide the necessary justification.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3983  Respondent: 15350785 / Rosemary Dresler  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the 2016 Draft Local Plan for the following reasons:

Loss of green belt – this is an essential part of our local area and we are just five minutes from the Surrey Hills Area of Outstanding Natural Beauty. It is an essential part of everyone’s health and wellbeing to have these green spaces.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4004  Respondent: 15351521 / Pamela Bristow  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the proposed Guildford Local Plan 2016 for the following reasons;

1. The removal of the Green Belt status around West Horsley which has been fiercely protected for a long time.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4008  Respondent: 15351553 / David Paton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the following aspects of the new proposals for the local plan and how it will affect my local environment and community.

1. Removal of the Horsleys from the green belt

I object to removing the Horsley's from the green belt. Greater London is already a huge urban sprawl that should not be extended. A mix of urban and more rural environments benefits the whole community.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4016  Respondent: 15351873 / Magaret Winborn  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO the removal of any villages from the Green Belt i.e in-setting. When will this stop, we'll have no green spaces left.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4031  Respondent: 15352001 / John Edwards  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

It is proposed by the Council that a number of villages in the Guildford area are to have protection from the Green Belt removed and this means that there would be no protection against development.

One of the reasons I live in Chilworth is because it is a village that sits within open and beautiful countryside and it would be disastrous to allow ribbon development, which is what would happen.

More housing would produce a greater amount of traffic onto our already overcrowded roads and lanes.

The Conservatives were voted in with a promise that they would protect the Green Belt. If this policy is carried out it would be a betrayal that will be remembered at the next elections.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/4032</th>
<th>Respondent: 15352065 / Daniel Sinclair</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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</tbody>
</table>

I am writing to express my complete dissatisfaction with the proposed local plan. In many ways it is in breach of regulations and facts have been misrepresented by GBC.

My main objections are as follows: I am not able to express them in legal jargon but these are the feelings of 90% or greater of the two villages of East and West Horsley. The Surrey Hills AONB is one of the great treasures of Guildford Borough and I strongly believe that protecting this area should be given the highest priority.

The opening statement of Policy P2 that “We will continue to protect the Metropolitan Green Belt” is blatantly disregarded all the way through this local plan. GBC appears to be in breach of this policy through the housing policies it has set out in the Proposed Submission Local Plan, whereby some 65% of developments will be made on land that is currently Green Belt. It is not a Government directive to build on greenbelt land as GBC present it and would have us believe. In fact Government guidelines say that greenbelt land should only be built on in. The local plan does not make nearly enough argument for ANY of the proposed greenbelt land developments to be considered ‘exceptional circumstances’. You have a duty to protect the greenbelt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/4038</th>
<th>Respondent: 15352065 / Daniel Sinclair</th>
<th>Agent:</th>
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</table>

In all, the draft plan is flawed in the extreme and GBC’s insistence on forcing developments where there is no proven need and riding roughshod over laws put in place to protect our valuable green spaces must be prevented at all costs. This plan must be rejected apart from the areas which I have identified.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/4040</th>
<th>Respondent: 15352321 / Nick Wooff</th>
<th>Agent:</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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</tbody>
</table>

1. I object to not protecting the Green Belt (Policy P2)
I object to removing Chilworth and Shalford from the Green Belt, and the resulting urban sprawl. I am a frequent visitor to this area and enjoy its natural beauty.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/4045</th>
<th>Respondent: 15352577 / Dominic Armstrong</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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</table>

I object to the proposal of removing Green Belt Protection to Chilworth Village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/4051</th>
<th>Respondent: 15353089 / Alison Teece</th>
<th>Agent:</th>
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<tbody>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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</table>

I object to Send Village being removed from the Green Belt. The Green Belt was intended to be permanent under the National Planning Policy Framework and there are no special circumstances that justify abandoning it. Both local councillors and central government gave a clear election promise to protect the Green Belt and this reneges on it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/4053</th>
<th>Respondent: 15353217 / Vali Drummond</th>
<th>Agent:</th>
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</table>

I want to record my objection to so many houses being built on the green belt near Guildford, or anywhere around the area actually. Already the traffic queues are sometimes for hours!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/4056</th>
<th>Respondent: 15353217 / Vali Drummond</th>
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</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Reclaim some of the MOD land that owns Acres & acres around Pirbright

= BUILD ON THAT !

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4068 Respondent: 15353505 / Susan Mazalon Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Finally, if you feel the need to do a Milton Keynes style attack on some of our finest landscapes then consider further down the A3 corridor towards Guildford where the current car boot sale is held. This may give easier access onto the A3 by being on a straight stretch away from junctions and the damage to the landscape and environment is arguably more "acceptable" as it is arguably less polluting and gives a speedy access to the shops and facilities of Guildford and Burpham.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4075 Respondent: 15353633 / Neal Stone Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Might it be more sensible to focus more modest development areas around those which are already significantly urban, rather than eradicating the protection afforded by the Metropolitan Green Belt? I was heartened by your statement in P2 that “we will continue to protect the Metropolitan Green Belt” but this is contrary to various Policies elsewhere. Your plan as it relates to the Horsleys and local environs seems to me to be completely out of keeping and proposes one of the greatest and fastest increases in housing numbers which is way beyond what seems in keeping, threatening villages that have grown very slowly over centuries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4079 Respondent: 15353633 / Neal Stone Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

3. I OBJECT to Policy P2: your proposal to move (and effectively eradicate in places) the Metropolitan Green Belt in order to allow development of our precious green spaces. The green belt was instigated with a brilliant single idea in mind, which was to prevent urban sprawl and your plan demonstrates scant regard for its protection. All these spaces are
discussed as potential land for development and I am shocked that there are no balancing values offered for enjoyment of these spaces for leisure, tourism, public health and wellbeing, biodiversity or natural heritage.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/4083</th>
<th>Respondent: 15353825 / Terry Madgwick</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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<td>is Sound? ()</td>
<td>is Legally Compliant? ()</td>
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</table>

I write to register my objection to the 2016 Draft Local Plan.

There are a whole raft of well-documented reasons for complaint ...

· Loss of Green Belt when it is abundantly clear that "brown field sites" remain under-utilised.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/4131</th>
<th>Respondent: 15355361 / Jennifer Brockless</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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<td>is Legally Compliant? ()</td>
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</table>

To remove Ripley, Send and Clandon from the Green Belt would create an amorphous suburban sprawl out of the three villages and, as such, compromise their identities. According to the National Planning Policy Framework set out by the Government in 2012, "There is a general presumption against inappropriate development, unless very special circumstances can be demonstrated to show that the benefits of development outweigh the harm caused to the green belt." (NPPF.2012). Beyond the need for new housing (which, as a reason, does not amount to "very special circumstances"), there is little in the new plan that satisfies this stipulation. Indeed, the following concerns (largely relating to infrastructure) would appear to demonstrate the opposite to be true.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/4134</th>
<th>Respondent: 15356353 / Pam Patrick</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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<td>is Sound? ()</td>
<td>is Legally Compliant? ()</td>
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</table>

I write in connection with the proposed new Guildford Local Plan. My objections are as follows:-

1). There is no 'special' reason to remove the Horsleys from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/4138</th>
<th>Respondent: 15356385 / Mervyn Plumtree</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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</table>

I object to all erosion of the green belt and any sites for development included in the local plan will only give the developers a wedge to continue their fight to erode our green and pleasant land.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<tr>
<th>Comment ID: PSLPP16/4139</th>
<th>Respondent: 15356385 / Mervyn Plumtree</th>
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</table>

I object to the removal of any villages from the green belt as this would lead to unsuitable development and the destruction of the integrity of our villages.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/4143</th>
<th>Respondent: 15356513 / Anthony Gatford</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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</table>

1. **I OBJECT to Send Village being removed from the Green Belt.**

The green Belt was intended to be permanent, per the National Planning Policy Framework and I believe there are no special circumstances to justify abandoning it. Send's Green Belt is an essential buffer between Guildford & Woking stopping it becoming one Urban Mass! Central Government & Local Councillors made a clear election promise to protect the Green Belt and this Plan renegades on the promise given to the electorate. Developers would be quick to seize upon such an opportunity and there would be no policy in place to stop them.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/4152</th>
<th>Respondent: 15356769 / Jennifer Galloway</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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</table>
3. I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I strongly object to the Guildford Local Plan 2016 to:

1. remove "inset" the neighbouring villages of Ripley, Send, Clandon and the Horsleys out of the Green Belt which will facilitate their merger into one another and inevitably lead to the creation of an unrestricted sprawl of large built-up areas;

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4178  
**Respondent: 15357025 / Emma Willis  
Agent:**

---

I am writing to lodge my objection to the proposed new Local Plan that removes Green Belt protection from Chilworth village. The NPPF places great weight on the protection of Green Belt and states that Green Belt boundaries should only be altered in exceptional circumstances. The need for housing is not considered exceptional and I believe Chilworth village contributes greatly to the openness and character of the countryside that the Green Belt is meant to protect for future generations.

The village undeniably adds to the open character of the countryside in topography and views. It is bounded on side by the Tillingbourne river and the historic Gunpowder Mills in the Tillingborne Valley with steep part wooded slopes up to St Martha's church; which is a prominent landmark and backdrop for the village. The village itself represents a modest and narrow strip of development that is bounded on the other side by the railway.

Further infill development would encroach on the north towards the steeply rising slopes of St Martha's with the historic medieval church of St Marthas and to the South the ecological conservation area of Blackheath.

Surely, the status affords Chilworth some recognition of the historic and current value to the Green Belt. The area surrounding Chilworth is in the Area of Outstanding Natural Beauty and therefore is of national landscape importance - indeed the link with historic industry means that the Area of Great Landscape Value recognises the area of County importance. The Chilworth conservation area has large area of open space which contributes to a soft, rural feel complemented by a backdrop of semi-wooded steep hillsides. Indeed, the removal of Green Belt status threatens the character and feel of the area from overspill and infill development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4179  
**Respondent: 15357057 / Keith Willis  
Agent:**

---

I object to the removal of Green Belt status from Chilworth village.
I fail to see from the Plan what the exceptional circumstances are that mean that Chilworth should have its Green Belt protection removed. It lies in the Tillingbourne valley floor with the northern boundary the river and the southern boundary the railway. Beyond these boundaries would mean allowing and encouraging development that would be wholly inappropriate for AONB, conservation area, AGLV in the Surrey Hills with specific views and topography that contribute to the local character and openness of the rural landscape. Shameful that our own Guildford Council should be the public body that plans to remove protection to allow urban sprawl to destroy the beauty of the countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to Send Village being removed from the Green Belt. The Green Belt was intended to be permanent as required by the National Planning Policy Framework and there are no special circumstances for abandoning it. Local councillors and central Government gave a clear election promise to protect the Green Belt and this should be upheld.

I object to the disproportionate amount of planned development in this area and the Council's complete lack of consideration for local residents whose lives will be severely affected by the mayhem which will be caused by these large scale developments.

I feel that Send, Ripley and Send Marsh must be protected from the vast amount of development planned on Green Belt land and the health and welfare of existing residents should be considered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4223  Respondent: 15357761 / Ross Haines  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the 2016 Draft Local Plan, I live on Winterhill Way in Burpham and am extremely concerned about the 2016 Draft Local Plan. In particular the proposed development of Gosden Hill Farm to build 2,000 homes and allocate multiple pitches for Travellers.

Green Belt

My family decided to live in Burpham because we liked the character of the village, wanted to send our children to the local schools and live in an area surrounded by beautiful Green Belt countryside. The 2016 Draft Local Plan puts all of these qualities that made the area desirable to us at risk. In particular the loss of Green Belt, once Green Belt is built upon it will be lost forever. Green Belt should only be built upon in exceptional circumstances and the Local Plan does not provide sufficient evidence to justify developing Gosden Hill Farm and as such should be considered unsound. More consideration should be given to developing brownfield areas. It is very upsetting to think that our local Green Belt areas are at risk due to an ill thought through and unnecessary development that will ruin the character of the local area forever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4227  Respondent: 15357921 / Lisa Goldsworthy  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing to register my objection to removal of the green belt protection from Chilworth and Shalford and Peasmarsh This would allow the guildford area to become a sprawling suburban development and would not be good for the rural environment
This is some of the most scenic country and well farmed, productive and used land and allowing building would be foolish.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4231  Respondent: 15358081 / Geoffrey Waterton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

In a way this does not directly concern me since I live in Old Woking (Woking Borough Council, of course. However the billboards displayed throughout Send become increasingly alarming. Is there any really good reason for the opposition against the proposed development? is there a shortage of land in the area - probably not? Yes it is part of a "green belt", but that can extend as far as you wish it to. Is there any good reason for this opposition except a dislike of change? As a well-intentioned member of the public I hope that the Borough Council will have very good reasons before they turn down this planning application.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4237  Respondent: 15358305 / Frances Hodgson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

The Plan should develop the existing brownfield site at Burnt Common rather than developing Garlick’s Arch (A43).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4269  Respondent: 15358497 / Liz Cooper-Mitchell  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

In no way do I object to new housing in moderation on brown belt areas but what has been planned is totally wrong and unacceptable.

I ask most strongly for future generations that the Horsley villages remain in the Green Belt.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4271  Respondent: 15358625 / Ron Best  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to this village (Send) being 'inset' and thus removed from the Green Belt. Green Belt is supposed to be in perpetuity, and in this case it provides an essential green zone which stops Woking and Guildford becoming a single conurbation unrelieved by open spaces. The removal of Send from the Green Belt will inevitably destroy its character as a village with a healthy environment and good recreational amenities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/129  Respondent: 15358625 / Ron Best  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Policy 2 at para 4.3.15 which will take the Send Business Park area (including the aforementioned marina site) out of the Green Belt altogether. This area of the Wey is a beautiful public amenity, the site is poorly served by a very narrow road, and this further incursion on the Green Belt will open up the possibility of further loss to an area of outstanding rural beauty. I trust my objections will receive your earnest consideration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4281  Respondent: 15358753 / Adam Lewis  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. We object to the Settlement Boundary which has been imposed on East Clandon without any consultation. This imposition provides no protection to further development outside of the settlement boundary (Policy P2 para 4.3.25) and is deemed by us as being unnecessary in an already tightly developed ancient and rural conservation village with high archaeological potential. We demand that this proposal be removed as it will endanger the openness of the Green Belt, the views in and out of the AONB (protection of the AONB Policy P1) and the character of our village.

2. Policy P2 – Green Belt: We object to this significant erosion of the Green Belt with the proposals for large towns being developed on Green Belt land thereby removing the openness of the Green Belt. We note in particular the huge developments proposed for the North East quadrant of the borough which will adversely affect our amenity, but also unfairly targets our tranquil rural villages because we can provide ‘dormitory’ facilities for commuters to London. These developments directly affecting our villages are the proposals for Wisley Airfield, Gosden Hill Farm, various farms and tracts in the Horsleys and Garlicks Arch at Send.
3. Further, on the erosion of Green Belt and we object that Policy P2 is not met where it states that Green Belt should be protected. We object to the disproportionate use of Green Belt land for housing – some 65% of the housing proposed is on Green Belt and with little consideration being given to redevelopment of brown field sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4286  Respondent: 15358753 / Adam Lewis  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

9. We object that GBC are contravening the NPPF framework stipulation in paragraph 87 with the proposed developments at Gosden Hill Farm, Ripley, East and West Horsley and Garlicks Arch, Send. Paragraph 87 states “As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.” and GBC have not proven any special circumstance for developing on these Green Belt areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4289  Respondent: 15358913 / Lisa Lewis  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

2. I object to the Settlement Boundary which has been imposed on East Clandon without any consultation. This imposition provides no protection to further development outside of the settlement boundary (Policy P2 para 4.3.25) and is deemed by me as being unnecessary in an already tightly developed ancient and rural conservation village with high archaeological merit. I demand that this proposal be removed as it will endanger the openness of the Green Belt, the views in and out of the AONB (protection of the AONB Policy P1) and the character of our village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4290  Respondent: 15358913 / Lisa Lewis  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

3. Policy P2 – Green Belt: I object to this significant erosion of the Green Belt with the proposals for large towns being developed on Green Belt land thereby removing the openness of the Green Belt. I note in particular the huge developments proposed for the North East quadrant of the borough which will adversely affect our amenity, but also unfairly targets our tranquil rural villages because we can provide ‘dormitory’ facilities for commuters to London. The developments directly affecting our villages are the proposals for Wisley Airfield, Gosden Hill Farm, various farms and tracts in the Horsleys and Garlicks Arch at Send.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/4291</th>
<th>Respondent: 15358913 / Lisa Lewis</th>
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</table>

4. Further, on the erosion of Green Belt and I object that Policy P2 is not met where it states that Green Belt should be protected. I object to the disproportionate use of Green Belt land for housing – some 65% of the housing proposed is on Green Belt and with little consideration being given to redevelopment of brown field sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<thead>
<tr>
<th>Comment ID: PSLPP16/4297</th>
<th>Respondent: 15358913 / Lisa Lewis</th>
<th>Agent:</th>
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1. I object that GBC are contravening the NPPF framework stipulation in paragraph 87 with the proposed developments at Gosden Hill Farm, Ripley, East and West Horsley and Garlicks Arch, Send. Paragraph 87 states “As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.” and GBC have not proven any special circumstance for developing on these Green Belt areas.

2. I note that there were over 20,000 responses objecting to the 2014 draft Plan and therefore I object that the Consultation Process has not been properly followed for this Plan which is not materially different from that plan.

3. I object to building on the Green Belt because the essential characteristic of Green Belt is its openness and permanence (National Planning Policy Framework paragraph 79).

4. I object to all other strategic sites in the Local Plan, Blackwell Farm, 3 Farms Meadows, Garlick’s Arch, West Horsley and Hog’s Back. All are out of proportion to the surrounding area and none qualify for the exceptional circumstances required to take them out of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/4303</th>
<th>Respondent: 15359137 / George Sprankling</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
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Furthermore I object to the use of valuable green belt land for building this should be left in trust for future generations and not be allowed to disappear.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<th>Comment ID: PSLPP16/4305</th>
<th>Respondent: 15359233 / Nigel Hall</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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</table>

I am writing to express my objections to the above plan concerning the Horsley area as I cannot see that the exceptional circumstances for removing this area from the green belt have been made.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/4314</th>
<th>Respondent: 15359329 / Andrew &amp; Elizabeth Robinson</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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</table>

As long-standing residents of East Horsley we wish to express our objections to the Guildford Local Plan as proposed. We are extremely concerned that the proposed development plans will change the character of several lovely Surrey villages for ever.

We object to the removal of the Horsleys from the Green Belt. There has been no effective demonstration of “exceptional circumstances” as required under the Government’s “Green Belt” Briefing Paper of January 2016. The proposed developments in the Horsleys do not meet the “exceptional” criteria and there is therefore no need for the Green Belt designation to be changed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/4323</th>
<th>Respondent: 15359905 / John Burns</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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</table>

I further object to policy P2 on the grounds that it conflicts with the guidelines, strictures and aims of the National Planning Policy Framework (NPPF) for protection of the GB. The authorities have not demonstrated why the boundaries have been moved when there are NO EXCEPTIONAL CIRCUMSTANCES to warrant such. As such the historic and rural setting of villages like Ripley will be irreparably damaged and any conservation areas will lose their raison d'être.

Development in flood risk areas, Policy P4: this really is stupid, flood risks are all too real yet here the L.A. seem to be encouraging it by allowing such areas to be included within the Plan. Land at Garlick's Arch is a good example of this, it is identified by the Environmental Agency as being in a flood Zone 3; this is the highest risk of flooding each year. Yet the L.A. have categorized the area as a flood zone 2 which has a lower probability for flooding. So we appear to be held hostage by the L.A.'s attempt to redesignate the areas flood risk despite the evidence of floods each winter?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
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<tr>
<th>Comment ID: PSLPP16/4343</th>
<th>Respondent: 15360065 / Alan Staines</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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<tr>
<td>1) Proposal to remove the Horsleys from the Green Belt.</td>
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<td>The &quot;exceptional circumstances &quot; required before taking action have not been demonstrated.</td>
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<td>2) Extension of the boundaries of the Settlement areas of the Horsleys.</td>
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<td>The proposed changes seem to have the sole objective of</td>
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<td>increasing the land available for future additional development but no</td>
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<td>reasons have been given for the proposed changes.</td>
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<tr>
<th>Comment ID: PSLPP16/9577</th>
<th>Respondent: 15360321 / Jean Miller</th>
<th>Agent:</th>
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<tbody>
<tr>
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<tr>
<td>I object to the “insetting” of so many villages from the Green Belt. (paragraph 4.3.13). The “special circumstances” used to justify this excessive use of the Green Belt are that the Plan’s growth targets require this. However, as stated above, this is all because the SHMA is too high. Get the SHMA down to a sensible level, and the wholesale raid on the Green Belt would not be necessary.</td>
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<td>In 2014, many people objected to the proposed Plan, partly because they considered too much Green Belt was to be developed. However I now see that an even greater percentage of homes is scheduled to be built on Green Belt. I strongly object to this as Green Belt should have been used as a constraint.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Attached documents:</td>
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</table>
**Comment ID:** PSLPP16/4364  **Respondent:** 15360993 / J Corrie  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The plan proposes to use green belt land destroying for ever an asset we all enjoy and wish to pass onto future generations. We should be cautious, politics is moving very fast and what may have seemed pragmatic before 23rd June may on reflection appear unduly hasty. We need to review the situation in the light of the changed circumstances.

In conclusion THERE IS NO EXCEPTIONAL CIRCUMSTANCES TO JUSTIFY USING GREEN BELT LAND NOR FOR REMOVING LAND FROM THE PROTECTION OF BEING GREEN BELT LAND.

The need for large scale developments is now changed since we have made the decision to leave the EU. There is no benefit for Normandy only the destruction of a village this village has a long history and played its part in the last war in preserving our democracy. Normandy with with fields and wildlife should not be sacrificed for a flawed plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/4371  **Respondent:** 15366209 / Corinne Singleton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT TO all erosion of the green belt
2. I OBJECT TO any "insetting" (ie removal) of any villages from the green belt

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp171/620  **Respondent:** 15366209 / Corinne Singleton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Green Belt, Policy 2 at paragraph 4.3.15
Send business Park now to be taken out of the Green Belt altogether I object to the proposal to inset Send Business Park from the Green Belt because:
1. As you will be aware this is effectively an old non-conforming user in an area of outstanding countryside which is adjacent to the beautiful Wey Navigation
2. The roads are narrow allowing restricted vehicle access along Tannery Lane in both directions
3. It is inappropriate for further expansion or development at this location and it will detract from the openness of Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/4375  **Respondent:** 15366529 / Roger Singleton  **Agent:**

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Section page number  Page 1231 of 1782  Document page number  1232
<table>
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<tr>
<th>Comment ID</th>
<th>Respondent</th>
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<th>Document</th>
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</thead>
<tbody>
<tr>
<td>PSLPP16/4382</td>
<td>15366721 / Sylvia Newton</td>
<td></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td>I object to the all erosion of the Green Belt</td>
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<td>Some re-thinking is certainly required</td>
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<td>Attached documents:</td>
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<tr>
<td>PSLPP16/4387</td>
<td>15366945 / M Wick</td>
<td></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td>I am writing to you over the proposal to take Chilworth and other villiages out of the Green Belt.</td>
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<td>As Chilworth, since 1945 on and off has had continuous development, and enough is enough, and the Green Belt, what is left of it should be untouchable.</td>
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<td>The removal of it would be give the so called developers the green light. Note, I called them &quot;So called developers&quot;. I would like call them &quot;Butchers of the land&quot;, Most of them live in offshore tax havens and they could not care less about the devastation of rural England which means so much to us.</td>
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<td>Attached documents:</td>
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<tr>
<td>PSLPP16/4393</td>
<td>15367361 / Greg Ganjou</td>
<td></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td>Re: Responses to Guildford Borough Proposed Submission Local Plan (June 2016)</td>
</tr>
</tbody>
</table>
I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, and I just do not understand how you can propose development on the green belt when I have been told by your office on a different matter that ANY development in the green belt is harmful and with no very special circumstances, therefore, against national planning policy and more importantly the wishes of the local residents that will have to live with these ridiculous and unnecessary decisions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/4396</th>
<th>Respondent:</th>
<th>15367361 / Greg Ganjou</th>
<th>Agent:</th>
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1. POLICY P2

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.
I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4413  Respondent: 15367361 / Greg Ganjou  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4427  Respondent: 15368129 / Sharon Cork  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY P2

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This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional
circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of “About Guildford” (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt.” This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.
Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 15368129 / Sharon Cork</th>
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1. SITES - POLICIES A1 TO A57

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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POLICY P2: Green Belt – East Horsley should be inset from the Green Belt

East Horsley’s rural village character has been preserved because of its Green Belt status. Currently development is allowed within the village settlement boundary within a particular planning regime. GBC attributes the need to inset East Horsley to National Planning Policy Framework (NPPF) requirements, arguing that the test for remaining ‘washed over’ is that the village should make an important contribution to the openness of the Green Belt. About 36% of East Horsley is composed of woodlands, whilst inside the settlement area there is an average housing density of just 8.1 dwellings per hectare ‘dph’) with many houses having large gardens which make a significant contribution towards bio-diversity, allowing wildlife corridors and open spaces which are vital to the character of the greenbelt.

I OBJECT to Policy P2

Paragraph 4.3.16 and Proposals Map: Settlement Boundary changes in East Horsley.

I object to two specific boundary changes, which have been proposed:

a) The proposal to move the East Horsley settlement boundary westwards from behind the houses on the west side of Ockham Road North up to the eastern boundary of Lollesworth Wood will remove over 5 hectares of agricultural fields from the Green Belt. The present boundary line is clearly defined by a deep and well-maintained drainage ditch which is
classified by the Environment Agency as a ‘main river line’ and therefore represents a highly defensible Green Belt boundary. Moving this boundary west to the edge of woodland in no way improves its defensibility. NPPF rules Green Belt boundaries should only be changed in ‘exceptional circumstances’. I do not believe this proposal can be considered as an exceptional circumstance. The only reason for this change seems to be to bring a large agricultural field within the settlement area in order to provide more housing land. However, under NPPF rules this is not a sufficient justification for changing a Green Belt boundary. It is therefore an invalid proposal and I OBJECT to this proposed boundary change.

b) The proposal to move the East Horsley settlement boundary westwards from behind the houses on the west side of Kingston Avenue up to a tree line running along the Parish Boundary at the western edge of Kingston Meadows (the main public recreational space of East Horsley, comprising various sports facilities and playing fields) will result in taking all of Kingston Meadows out of the Green Belt. The present settlement boundary is clearly defined by a deep and well-maintained drainage ditch running along its eastern side. It therefore again represents a very defensible Green Belt boundary. Moving this boundary westwards to the edge of woodland in no way improves its defensibility. Under NPPF rules Green Belt boundaries should only be changed in ‘exceptional circumstances’. I do not believe that this can be considered as an exceptional circumstance.

It is therefore an invalid proposal and I OBJECT to this boundary change.

Paragraph 4.3.16: Proposal to remove Wisley Airfield from the Green Belt

The only justification for this proposed change is unfulfilled housing need which is not considered an exceptional circumstance.

I OBJECT to the proposal to remove Wisley Airfield from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/4532  **Respondent:** 15368993 / Tessa Spink  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. **POLICY P2**

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disrespectful to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.
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I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

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GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
With regard to the 2016 Draft Local Plan:

1. **I OBJECT** to Send Village being removed from the permanent green belt, as intended by the National Planning Policy. There are no special circumstances to justify removing Send from the Green Belt as originally elected by local councillors & central government. This is reneging on a clear election promise, which is unacceptable. We do not wish to be part of a conurbation and value our village status. Developers will be taking advantage to over-populate the village, very quickly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4608  Respondent: 15370593 / A Gee  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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2. I OBJECT to not protecting the Green Belt

I object to the proposals to remove the villages of Send, Ripley and Glandon from the Green Belt together with the sites of Wisley Airfield and Garicks Arch. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered or the development of the Green Belt. There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. This is something that villagers from each village do not want to happen.

(Instead of developing Garicks Arch and Send Hill, there is a "brownfield" site just to the south of the Burnt Common roundabout with surplus land that could accommodate a further development)

In your recent free newspaper "About Guildford", you state that the Green Belt must be saved and to use all "brownfield" sites for development. So why doesn't the council abide by it's own statements?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to building on the Green Belt. The essential characteristic of Green Belt is its openness and permanence: moreover this Government featured in its manifesto full protection of Green Belt as a core undertaking.

I object to the changes to Green Belt boundaries. This is not justified by any very special circumstances. All Green belt sites meet the five purposes of the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object that housing on the Green Belt will significantly increase traffic already at saturation point) bringing increased danger, pollution and slower journey times.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>1.</td>
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<td>Our Green Belt is precious. It is what protects London from urban sprawl; it preserves air quality; it prevents flooding; it is the city's playground. It is for us to conserve and protect it. There are 5 legal purposes for Green Belt, and it meets them all:</td>
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<td>• To check the unrestricted sprawl of large built up areas</td>
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<td>• To prevent neighbouring towns merging into one another</td>
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<td>• To assist in safeguarding the countryside from encroachment</td>
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<td>• To preserve the setting and special character of historic towns</td>
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<td>• To assist in urban regeneration by encouraging the recycling of derelict and other urban</td>
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<td>This policy is flawed and should have been amended. In the last consultation just six individuals, out of the c. 7,000 of those who took part in the consultation, supported the policy. Another 20 comments of support were from organisations such as: the University of Surrey, local councils (including Guildford), consultants (e.g. Savills) or landowners. But of the 1,371 who commented on the green belt policy 1,332 (97%) were against.</td>
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<td>7.</td>
<td>NO EXCEPTIONAL CIRCUMSTANCES</td>
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<td>The local plan proposes nearly 9000 new homes to be built on Green Belt land (compared with 50 000 current homes in Guildford, so approx. equal to 18% of the existing homes in the borough) - a huge proportion. The National Planning Policy Framework (NPPF) requires any change of Green Belt boundaries to demonstrate exceptional circumstances. Unmet</td>
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housing need is NOT an exceptional circumstance in law. No exceptional circumstances have been disclosed. So the Green Belt boundaries should NOT be changed through the plan making process.

8. **BROWNFIELD AVAILABLE**

There is brownfield land available in the town centre which is being earmarked for commercial development rather than for housing. This is enough to meet our real needs for affordable local homes. There are enough vacant commercial sites to cope with genuine business need, and we have enough retail capacity already, so urban brownfield/derelict land should be used for housing.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: PSLPP16/4695  **Respondent:** 15371809 / Susan Pengilly  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

As a resident in Ripley/Send Area I am aghast at the proposed local plan:

I object to removal or "insetting" of Ripley, Send and Clandon areas from the green belt - this is total turnaround on gov policies to honour and protect greenbelt areas.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: PSLPP16/4705  **Respondent:** 15372417 / P. Mew  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

3. I object to not protecting the Green Belt (Policy P2)

I object to the proposals to remove the villages of Ripley, Send and Glandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick's Arch (A43).

National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

Rather than developing Garlick's Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

• I object to the building on the Green Belt at Send at Garlick's Arch, Clockbarn Nurseries and Send Hill because it is not justified by any special circumstances and the fact that Green Belt is meant to be permanent and not continually eroded.

• I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford's urban brownfield areas much closer to existing transport hubs.

• I object to the large proposed development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.

• I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity.

• I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/4793  Respondent: 15377473 / Deborah Holden  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/10000  Respondent: 15377473 / Deborah Holden  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4800  Respondent: 15377793 / Robin Dabbs  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO THE 2016 DRAFT LOCAL PLAN  
I OBJECT TO ALL EROSION OF THE GREEN BELT  
I OBJECT TO THE REMOVAL OF ANY VILLAGES FROM THE GREEN BELT  
I OBJECT TO THE DISPROPORTIONATE DEVELOPMENT IN ONE AREA  
I OBJECT TO THE LIMITED CONSULTATION PERIOD  
I OBJECT TO INCLUSION OF NEW SITES WITH UNDER 2 WEEKS NOTICE
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4801  Respondent: 15377825 / Christopher Dabbs  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO THE 2016 DRAFT LOCAL PLAN

I OBJECT TO ALL EROSION OF THE GREEN BELT

I OBJECT TO THE REMOVAL OF ANY VILLAGES FROM THE GREEN BELT

I OBJECT TO THE DISPROPORTIONATE DEVELOPMENT IN ONE AREA

I OBJECT TO THE LIMITED CONSULTATION PERIOD

I OBJECT TO INCLUSION OF NEW SITES WITH UNDER 2 WEEKS NOTICE

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4812  Respondent: 15377953 / cctvtraining.com ltd (Gordon Tyerman)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY P2 – Green Belt

GROUNDS FOR OBJECTION We object to the insetting of 14 villages from the Green Belt, and the proposal that infilling is acceptable within a further 12 villages within the Green Belt. We are concerned that “infilling” is also proposed outside the settlement boundaries of 11 further villages. Essentially, all the villages within the Green Belt are now vulnerable to extensive further development.

Green Belt is supposed to be protected as a matter of national and local policy, but this policy seeks to justify development in a supposedly protected area, in breach of local manifesto commitments and contrary to previous responses to public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4847  Respondent: 15379969 / Teresa Britton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
1. POLICY P2

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of “About Guildford” (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt.” This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.
This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4863  Respondent: 15379969 / Teresa Britton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. SITES - POLICIES A1 TO A57

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4883  Respondent: 15380129 / Penny Moore  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I am writing to express my objection to the proposals in the Guildford Local Plan for the Horsleys.

I have a number of concerns regarding the plan:

1. The proposal to remove the Horsleys from the Green Belt without proving “exceptional circumstances”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/4926</th>
<th>Respondent: 15380289 / Stephen Hewlett</th>
<th>Agent:</th>
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<td>Proposed 70% new housing on green belt. [Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature.] What’s the point in having a Green Belt if you are just going to ignore it and build on it!!!</td>
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I note that the Summer 2016 edition of “About Guildford” (published by the Council) on page 5 states that “... the Plan rejects any schemes that would have a detrimental impact on the Green Belt.” This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constrain. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of “About Guildford” (published by the Council) on page 5 states that “... the Plan rejects any schemes that would have a detrimental impact on the Green Belt.” This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

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There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4972  Respondent: 15381249 / Helen Poyntz  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
<table>
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<tr>
<th>Comment ID: PSLPP16/4976</th>
<th>Respondent: 15381441 / Gillian Ward</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Co Operate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. **SITES - POLICIES A1 TO A57**

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<th>Comment ID: PSLPP16/5003</th>
<th>Respondent: 15382529 / Reuben Lee</th>
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Do you consider this section of the document; complies with the Duty to Co Operate? ( ), is Sound? ( ), is Legally Compliant? ( )

2). I object to not protecting the Green Belt (Policy P2).

Removing Ripley, Send and Clandon from the Green Belt is unacceptable. These are villages that have always been surrounded by agricultural land that gives them their character. Whilst increasing population requires further housing development, large scale plans such as Wisley airfield and Garlick’s Arch are inappropiate in such areas and removing these villages from the Green Belt is just an "underhand way" to allow such developments and more in the future.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

I OBJECT categorically with the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is ill thought out unproven and unnecessary.

Please find below my objections

1. I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to any proposal to take land out of the Greenbelt as is suggested with villages such as Ripley, Send and Clandon as well as sites of Wisley Airfield (A35) and Garlick’s Arch (A43). The National Planning Policy states
clearly that it requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt and that housing need is not such an exceptional circumstance.

There are no exceptional circumstances for these villages (as mere housing need does not constitute a 'special circumstance' and the land to be taken from the Green Belt.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We support the Guildford Residents Association response and oppose the proposed expansion of Guildford. We cherish to protect the character of the town and surrounding green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1278  Respondent: 15384385 / Sheila M King  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We believe the current plan to be deeply flawed. It will lead to unacceptable loss of Green Belt as well as increased traffic congestion. We urge the council to reconsider.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5098  Respondent: 15385281 / Daniel Tarrant  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

As a resident of Burnt Common, Send I object to the following proposed developments:

I object Policy P2. In-setting of Send and Ripley.

I object to taking Send and Ripley out of the Green Belt, I see no exceptional circumstances for this.

Vulnerable land includes, School playing fields and land adjoining the Wey Navigation Canal, a National Trust facility.

Also, Villages to the East of the A3 maintain Greenbelt status.

I object to building on ‘Green Belt’ land, which are the lungs of London. And are meant to prevent Urban spread in the countryside and the linking of settlements. In this case Send, Ripley and on a broader scale to Woking and Guildford.

Local and Central Government gave clear commitment that the green belt would be protected. These proposed development go against this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5104  Respondent: 15385601 / Richard Fletcher  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objection to Guildford Proposed Submission Local Plan
I object to the removal of East and West Horsley from the Green Belt and the building of 533 new houses in the area (excluding the proposals for the Wisley airfield).

No special circumstances have been demonstrated to justify the loss of Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5123  Respondent: 15386017 / Gareth Sinnett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Re: Responses to Guildford Borough Proposed Submission Local Plan (June 2016)

I am writing to express my serious concerns relating to the most destructive policy ever to be imposed on the population of Surrey, or as you call it the ‘Guildford Borough Plan’. In addition to my comments below which directly relate to the outlined proposals, I am disappointed and perplexed as to how the council feels to is right to make such ludicrous plans at the significant expense of areas of outstanding natural beauty in the Guildford area.

The plan is a total attack on the beautiful green areas which surround the northeast of Guildford, and it is not only unethical to propose building on Greenbelt land but destructive to a small local village community within this region. Greenbelt land is intended to protect small village settlements, such as West Clandon, from the urban sprawl of larger town and cities, and the residents of such communities live away from urban areas out of choice. As such it is totally unacceptable to be proposing to build on such large green spaces as an urban extension, when it will totally transform the number of residents living within a parish.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5127  Respondent: 15386017 / Gareth Sinnett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY P2

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.
Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of “About Guildford” (published by the Council) on page 5 states that “… the Plan rejects any schemes that would have a detrimental impact on the Green Belt.” This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.)

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.
GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

19. SITES POLICIES A1 TO A57
I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site-by-site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

1. POLICY P2
I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage.
The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of “About Guildford” (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.
There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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** I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

** I object to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)
This will cause more congestion to the villages of Ripley, Send and Clandon, which have poor condition narrow roads and no footpaths, which are dangerous. More houses will increase this danger and unsustainable volumes of traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5173  Respondent: 15388641 / Eva Hay  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Re: Objections to Regulation 19 Draft Guildford Borough Council Local Plan

I wish to object to the above for the following reasons:

- I object to the removal of Send, Ripley and Clandon from the Green Belt because these villages and surrounding countryside provides a necessary ‘buffer’ to prevent urban sprawl.
- I object to the proposed building on the Green Belt at Send at Garlick’s Arch, Clockbarn Nurseries and Send Hill because there are no ‘special circumstances’ to justify this. The Green Belt should not be continually eroded and should stay permanent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5175  Respondent: 15388641 / Eva Hay  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

-I object to all proposed building on the Green Belt at Send, Ripley and Clandon as any development needed can be accommodated in Guildford’s urban brownfield areas much closer to existing transport hubs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5177  Respondent: 15388641 / Eva Hay  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- I object to the huge developments planned of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large quantities of agricultural land and Green Belt. “The fundamental aim of the Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belt are their openness and their permanence.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/5181  Respondent: 15388641 / Eva Hay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

I wish these objections to be fully considered and taken into account when changing the proposed Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5186  Respondent: 15388673 / Bruce Stewart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY P2

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites...
than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of “About Guildford” (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstances for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. SITES - POLICIES A1 TO A57

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5206  Respondent: 15388865 / Andrew Powell-Cullingford  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

2. I object to all development in the Green Belt and AONB (Policy P2)

I object to the 4 strategic sites on previously undeveloped land of A43 Garlick's Arch, A25 Gosden Hill, A35 Wisley Airfield and A26 Blackwell Farm as this directly contravenes the protection of Greenbelt land and none of these sites demonstrate the exceptional circumstances required in the NPPF to even consider any encroachment on Greenbelt. I also object to all other developments listed in the local plan which are in the Greenbelt on previously undeveloped sites.

I also object to all insetting of ALL villages in this local plan. In particular I object to the insetting of Ripley and Send Marsh/Burnt Common and Send as this will inevitably lead to coalescence. These villages and communities have their own distinct identities as a result of gradual growth over many centuries. We are not urban areas but rural villages with vibrant communities. Nothing has demonstrated this more than the huge response by members of all these areas who have come together very rapidly to fight this local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7853  Respondent: 15388865 / Andrew Powell-Cullingford  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
vibrant communities. Nothing has demonstrated this more than the huge response by members of all these areas who have come together very rapidly to fight this local plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/5217  **Respondent:** 15389025 / Keith Cogan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I write to object very strongly to the proposal to remove Send from the Green Belt and to the developments proposed at Send Hill (A44), (A42) Clockbarn Nurseries and (A43) Garlick’s Arch and also (A35) 2,000 houses at Wisley Airfield, (A25) 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm. Also A36-A39 which transform the village of Horsley.

I work in Woking and shop in Guildford where my children went to school. I have lived in this area for 16 years and it is clear that Send village, the surrounding countryside and the green belt protection provides a crucial buffer between Woking and Guildford. The green belt has provided the protection needed for many years and I cannot see any justifiable reason for removing it now when it would appear more necessary than ever. As a Fellow of the Institutions of Civil and Structural Engineers and Member of the Institute of Highways and Transportation I have attended many discussions with developers assessing sites for development and the lure of bigger profits building on greenfield sites in preference to more expensive brownfield sites makes this kind of protection absolutely essential both preserving the countryside and nature and also encouraging investment back into our cities and towns. I strongly believe that sufficient brownfield sites are available, closer to transport hubs and that would benefit from developments of this type bringing life back into the town centres.

I don’t think the Guildford Borough Council have demonstrated sufficient investigation of brownfield sites within urban areas which should be targeted first for development before the open countryside and the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/5963  **Respondent:** 15389025 / Keith Cogan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I work in Woking and shop in Guildford where my children went to school. I have lived in this area for 16 years and it is clear that Send village, the surrounding countryside and the green belt protection provides a crucial buffer between Woking and Guildford. The green belt has provided the protection needed for many years and I cannot see any justifiable reason for removing it now when it would appear more necessary than ever. As a Fellow of the Institutions of Civil and Structural Engineers and Member of the Institute of Highways and Transportation I have attended many discussions with developers assessing sites for development and the lure of bigger profits building on greenfield sites in preference to more expensive brownfield sites makes this kind of protection absolutely essential both preserving the countryside and nature and also encouraging investment back into our cities and towns. I strongly believe that sufficient brownfield sites are available, closer to transport hubs and that would benefit from developments of this type bringing life back into the town centres.
I don’t think the Guildford Borough Council have demonstrated sufficient investigation of brownfield sites within urban areas which should be targeted first for development before the open countryside and the Green Belt.

I object to the building on the Green Belt at Send at Garlick’s Arch, Clockbarn Nurseries and Send Hill, I cannot see any justification or special circumstances for eroding the Green Belt in these locations. I don’t understand and object to the aggregated “housing need” figures quoted which appear far too high. In my view these figures are incorrect and should be challenged before considering developments on our green belt that are not wanted and potentially completely unnecessary.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

These proposed developments completely destroy the green belt barrier separating Guildford from Burnt Common, Ripley and several other villages in the area!! I am astonished that such a proposal could be considered. These are huge areas of development that would completely destroy the countryside and change the nature of the surrounding villages, wildlife passing through etc. Almost completely removing this band of green belt entirely!! Green belt was brought in to protect our countryside and I object very strongly to these proposals. Please think again. I live on Potters Lane, I love the mix of village and countryside that characterise this area and these proposals would completely change the nature of the village, neighbouring countryside and opportunities for wildlife to survive. Surely we owe something to future generations to stop building over the countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

You have removed areas from green belt when surely green belt is specifically to protect countryside and the proposals mean send and ripley are joined and will no longer be two separate villages. you propose extending industrial areas that should never have been located there in the first place, requiring people to drive to work in these locations remote from built up areas where people live requiring jobs. It makes no sense to me.

Policy 2 para 4.3.15 send business park taken out of the green belt altogether!

- Again I object for the same reasons given elsewhere.
- Encouraging development and building over green belt in these locations is a dreadful idea
- Why encourage business parks in the middle of the countryside?

These proposals are worse to those I objected to previously, I can see no improvement only more and more building in the countryside with complete disregard for the wishes of the people that live there and the fact this land is protected as green belt – for very good reason.

- These proposals ignore previous objections, there is no improvement but rather the opposite.
- The scale of the developments has increased not reduced
Traffic problems will be worse on roads that are not suited and at a time when surely we finally realise we
should be removing the need for cars. Surely you should be developing brownfield sites and protecting the green
belt?!

Villages start to disappear as they are conjoined with development, its tragic that the nature of our green belt is
being built over in this way.

These proposals are inappropriate, they don’t suit or support the requirements of the communities that live here
and

Fail to protect this land for nature / wildlife and future generations

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5230  Respondent: 15389089 / R.A. Norfolk  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5251  Respondent: 15389121 / M.C. Hollister  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5257  Respondent: 15389185 / M. Patrick  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5262  Respondent: 15389217 / B.J. Blair  Agent:
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<th>Respondent: 15389249 / Michael Dixey</th>
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<th>Respondent: 15389345 / Peter Reynolds</th>
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<th>Respondent: 15389537 / S Slocombe</th>
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I OBJECT TO THE REMOVAL OF CHILWORTH FROM THE GREEN BELT.

I FIND IT DIFFICULT TO UNDERSTAND WHY THE VILLAGE OF CHILWORTH IS TO BE REMOVED FROM THE GREEN BELT, WHEN OTHER VILLAGES IN THE TILLINGBOURNE VALLEY, I.E ALBURY, SHERE, GOMSHALL AND ABINGER ARE NOT TO BE REMOVED.

IN THE ST.MARTHA PARISH OF CHILWORTH MOST OF THE LAND IS IN AN AREA OF OUTSTANDING NATURAL BEAUTY.
IS IT ALSO INTENDED TO TAKE THIS OUT OF THE GREEN BELT?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5298  Respondent: 15389697 / Oliver Stewart  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to building on the Green Belt because the essential characteristic of Green Belt is its openness and permanence (National Planning Policy Framework paragraph 79).

I set out below my objections to specific policies and matters within the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5303  Respondent: 15389697 / Oliver Stewart  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY P2

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional
circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.
Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5322  Respondent: 15389697 / Oliver Stewart  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. SITES - POLICIES A1 TO A57

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5340  Respondent: 15390273 / Roderick Hutchison  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the removal of Send and other nearby villages from the Green Belt. The inevitable result of this would be extensive development effectively removing the buffer between Guildford and Woking. Amongst the areas lost would be school playing fields and woodland: a great loss of amenity for all residents. Removal of Green Belt status also leaves the affected areas vulnerable to further undesirable development in future.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5334  Respondent: 15390337 / Daniel Smith  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to not protecting the Green Belt (Policy P2)
There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/5348</th>
<th>Respondent: 15390369 / Lewis Thorpe</th>
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<td>I strongly object to Send Village being removed from the Green Belt. The Green Belt was intended to be permanent, as required by the national Planning Policy Framework, and there are no special circumstances to justify abandoning it. Send's Green Belt provides an essential buffer stopping Woking and Guildford becoming one conurbation. Local councillors and central government gave a clear election promise to protect the Green Belt and this reneges on it. Developers will be quick to take advantage and there will be nothing to stop them. There is plenty of brownfield land still available for developing in the Surrey area.</td>
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Section page number Page 1274 of 1782 Document page number 1275
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The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

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I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

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There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5369  Respondent: 15390401 / William Stewart  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. SITES - POLICIES A1 TO A57

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5385  Respondent: 15390785 / Francesca Molossi-Murphy  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional
circumstances for these villages (as mere housing need does not constitute a 'special circumstance' and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC's Green Belt & Countryside Report does not address Garlick's Arch, so there is no evidence base to support including this site.

Rather than developing Garlick's Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/5383  **Respondent:** 15390913 / Linda Berry  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I wish to strongly object to the councils plan to remove the greenbelt status from a number of our local villages, i.e. Chilworth & Shalford.

As a local resident living close to these villages, I am of the opinion that further developments on greenbelt protected land will have a serious negative impact on the area, which is already heavily congested with traffic during the rush hour period.

We are very fortunate to live in such a beautiful and relatively unspoilt part of the country, so let’s keep it so. These villages cannot take anymore development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/5400  **Respondent:** 15390977 / Roger Davy  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I formally object to the removal of the green belt protection from the local villages as proposed in the new local plan.

Surely before any proposed alterations to the area and any developments approved in principle, the local infrastructure must first be reviewed.

As an example from Chilworth via New Road the traffic backs up past the Tilling Bourne School on a regular basis. After turning right towards Shalford again the traffic backs up immediately all the way to the roundabout on the A381 the build-up is all the way to Guildford. The A281 before Bramley coming from Dunsfold backs up often for 2 miles.

The housing proposals for Dunsfold, Alfold and Cranleigh will add thousands of new properties and therefore cars vans etc. to the local roads these will become rat runs with people trying to get to Guildford.
Traffic is not the only concern. Doctors, Schools are already at breaking point will read reviewing and will become a major concern for many people.

As this is an area of outstanding natural beauty losing any of the green belt would cause irreparable damage. I therefore would need to see the infrastructure problems dealt with and how the finance for such works provided before any such removal of the green belt protection is implemented.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/5396  **Respondent:** 15391041 / Anne Lawrence  **Agent:**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I oppose unjustified Green Belt development.

It is irresponsible to squander every last resort greenfield site in a single Plan, robbing future generations.

Brownfield opportunities are being ignored – we need homes in the centre (not 40% more shops), much more accommodation on campus for students.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/5403  **Respondent:** 15391329 / Marian Tarrant  **Agent:**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

As a resident of Send I object to the following:

I object Policy P2. In-setting of Send and Ripley.

I object to taking Send and Ripley out of the Green Belt, I see no exceptional circumstances for this.

Vulnerable land includes, School playing fields and land adjoining the Wey Navigation Canal, a National Trust facility.

Also, Villages to the East of the A3 maintain Greenbelt status.

I object to building on ‘Green Belt’ land, which are the lungs of London. And are meant to prevent Urban spread in the countryside and the linking of settlements. In this case Send, Ripley and on a broader scale to Woking and Guildford.

Local and Central Government gave clear commitment that the green belt would be protected. These proposed development go against this.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Comment ID: PSLPP16/5404  Respondent: 15391361 / Paul Thorpe  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I strongly object to Send Village being removed from the Green Belt. The Green Belt was intended to be permanent, as required by the national Planning Policy Framework, and there are no special circumstances to justify abandoning it. Send's Green Belt provides an essential buffer stopping Woking and Guildford becoming one conurbation. Local councillors and central government gave a clear election promise to protect the Green Belt and this reneges on it. Developers will be quick to take advantage and there will be nothing to stop them. There is plenty of brownfield land still available for developing in the Surrey area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/5413  Respondent: 15391681 / Martin Pope  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the removal of villages from the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5414  Respondent: 15391809 / Dan Haskins  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I wish to communicate my strong objections to the latest planning proposals that will impact Send and Ripley, which will have a very negative impact on the quality of life for my family and others living in Send and Ripley. I am horrified by the level of development that is being proposed by the very people who are meant to represent me and my family. I will detail each objection clear below..

Firstly, I object to Send and Ripley being removed from the Green Belt. The green belt’s purpose was intended to be permanent and there is absolutely no justification for abandoning it. Quality of life for those already living in the greenbelt will be destroyed and the levels and density of housing will create the all manner of pressures on local resources, including roads, doctors, schools etc. I am sure that local councillors don’t need reminding that they are elected to represent the interests of their local constituents, of which they are doing a very poor job. Clear election promises have been broken.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5420  Respondent: 15397505 / Andrew Krisson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
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<tr>
<th>Comment ID: PSLPP16/5427</th>
<th>Respondent: 15397793 / Sheila Collins</th>
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<td>And as for assuming you can just take our greenbelt status away! How dare you! We have had more than enough homes built in and around Ripley, Leave us alone!</td>
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<td>I object removing Send Business Park from the Green Belt (4.3.15).</td>
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<td>Send Business park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for it’s insetting (removal) from the Green Belt, and indeed GBC have not even attempted one. Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.</td>
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Send Business park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for it’s insetting (removal) from the Green Belt, and indeed GBC have not even attempted one. Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5431  Respondent: 15397953 / Gillian Dobson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick's Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5432  Respondent: 15397953 / Gillian Dobson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Plan should develop the existing brownfield site at Burnt Common rather than developing Garlick's Arch (A43).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5440  Respondent: 15398081 / Jill Pope  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/5449  Respondent: 15398241 / Paul McNamara  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

In specific, I object to the proposal to remove Send and other local villages from the Green Belt. Doing this will allow developers carte blanche to develop the last remaining rural areas and will eventually ensure that Woking and Guildford merge into one urban area with all the challenges that occur, i.e. roads, schooling, amenities etc. There are no exceptional circumstances that allow for these villages to be removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5457  Respondent: 15398497 / G J Masson  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

There should in my view be no loss of Green Belt land. It is there for a purpose to protect the existing villages and enhance their environment and the rural nature of the area. An increasing urban sprawl is not a desirable objective and the areas effected should remain as open and permanent Green Belt land as buffers for the existing communities.

Gosden Hill is in the Green Belt. If this scheme goes ahead it is likely to generate pressure from adjoining landowners for their land to be developed over time and it represents the 'thin end of the wedge' which is likely to result in further significant losses for future development and the increasing urbanisation of the area. In my view the proposed development of this land should be resisted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5456  Respondent: 15398529 / Judith Linnegar  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I write to object to the proposals to remove Ripley, Send and Clandon from the Greenbelt. There are no special circumstances to do this and once taken "Greenbelt" is lost forever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5463  Respondent: 15398593 / Kirsten Collins  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the policy to remove the village of Send from the Green Belt. The Green Belt designation of the village of Send provides a key buffer zone between Woking and Guildford that should prevent them from merging in the future and I do not see the 'exceptional circumstances' referenced in 4.3.16. The Government notes that there are 5 main purposes to Green Belt land and I contend that the Green Belt designation of Send is important for maintaining the first 3 of these (listed below).

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

In particular, areas of land proposed for removal from the Green Belt include areas behind the school consisting of playing fields and woodland, which are important to the character of the local community and the quality of its schooling, as well as land around the Wey navigation near Cartbridge that should not be encroached upon. I only recently moved to the area and I was attracted by the easy access to the countryside that living in Send would afford me and I believe that this proposal will threaten that, making Send a less appealing village.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp171/367  **Respondent:** 15398593 / Kirsten Collins  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Policy 2 of the Green Belt section (paragraph 4.3.15) that would inset Send Business Park form the Green Belt as this is an area of beautiful countryside adjacent to the Wey Navigation and any further development would reduce the openness of the Green Belt. I am also concerned about increased traffic along tannery lane that would result from further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/5464  **Respondent:** 15398625 / Tineke Robertson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I The Green belt: Well there is such a lot of talking about the environment, the climate change. We need our greenbelt and not have it concreted over with roads and housing developments. We need our trees, shrubs, wildlife etc.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/5469  **Respondent:** 15398657 / Kim Roberts  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

---
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY P2

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of “About Guildford” (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.
This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of, Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5486  Respondent: 15398657 / Kim Roberts  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**SITES - POLICIES A1 TO A57**

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5489  Respondent: 15398721 / J.M. Nokes  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Removing villages from the Green Belt without higher authority permission is monstrous and cannot be allowed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/5500  **Respondent:** 15399041 / Sue Ely  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

3. I object to not protecting the Green Belt (Policy P2)

I object to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick's Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a 'special circumstance' and the land to be taken from the Green Belt. Once taken the Green Belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC's Green Belt & Countryside Report does not address Garlick's Arch, so there is no evidence base to support including this site.

Rather than developing Garlick's Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/5537  **Respondent:** 15400385 / Robert Bonnar  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Despite living outside the Borough of Guildford I have a greater interest in what goes into the Guildford Local Plan for the local area than many of those living on the far side of the borough.

In summary my objections are as follows...

- Object to the removal of the Former Wisley Airfield from the Green Belt. The area serves a vital role in preventing urban sprawl from London and a development would create an urban corridor stretching from London to Guildford.
- No exceptional circumstances have been established to warrant removing the site from the Metropolitan Green Belt.
- There is ample brownfield land in urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/5557  Respondent: 15400641 / Anne Barker  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5601  Respondent: 15400769 / H L Cunnah  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- Loss of Green Belt land -

Sadiq Khan, the new Mayor of London, has instructed London planners not to approve development on Green Belt Land within the M25. If we continue to build on our countryside it won't be many decades before we have none left. Creeping development has led to almost continuous housing from Central London to Effingham. Is this to carry on to Guildford and beyond? (1,700 houses are planned for the Guildford end of the Hogs Back and 1,000 new houses on Greenfield sites in Normandy.) We must place some value on Greenbelt land as otherwise there will be none left for future generations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10725  Respondent: 15400769 / H L Cunnah  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

(2) Loss of Green Belt land –

Sadiq Khan, the new Mayor of London, has instructed London planners not to approve development on Green Belt Land within the M25. If we continue to build on our countryside it won’t be many decades before we have none left. Creeping development has led to almost continuous housing from Central London to Effingham. Is this to carry on to Guildford and beyond? (1,700 houses are planned for the Guildford end of the Hogs Back and 1,000 new houses on Greenfield sites in Normandy.) We must place some value on Greenbelt land as otherwise there will be none left for future generations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10598  Respondent: 15400865 / M J Cunnah  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
2) Loss of Green Belt land –
Sadiq Khan, the new Mayor of London, has instructed London planners not to approve development on Green Belt Land within the M25. If we continue to build on our countryside it won’t be many decades before we have none left. Creeping development has led to almost continuous housing from Central London to Effingham. Is this to carry on to Guildford and beyond? (1,700 houses are planned for the Guildford end of the Hogs Back and 1,000 new houses on Greenfield sites in Normandy.) We must place some value on Greenbelt land as otherwise there will be none left for future generations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5604  Respondent: 15400897 / Alison Parkinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

As a resident of Send I am writing to object to the PROPOSED DESTRUCTION OF OUR VILLAGE!

There are so many aspects of the proposed development that I am extremely concerned about as follows:

I OBJECT to Send Village being removed from the Green Belt. I moved to this village specifically because it was in Green Belt and if this is removed from the area it will give leave to Developers to take advantage and build over our beautiful fields and ultimately joining Woking and Guildford as one massive conurbation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5605  Respondent: 15400961 / Joan Plumtree  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to all erosion of the green belt and any sites for development included in the local plan will only give the developers a wedge to continue their fight to erode our green and pleasant land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5607  Respondent: 15400961 / Joan Plumtree  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the removal of any villages from the green belt as this would lead to unsuitable development and the destruction of the integrity of our villages.
I object to the removal of villages from the Green Belt.

1. **POLICY P2**

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.
I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5673  Respondent: 15406017 / Eleanor Roberts  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY P2

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider
this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5694  Respondent: 15406017 / Eleanor Roberts  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. SITES - POLICIES A1 TO A57

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.
1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5696  Respondent: 15406145 / Paul Moore  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing to express my objection to much of what is proposed for the Horsley in the Guildford Local Plan.

I have a number of concerns regarding the plan:-

The proposal to remove the Horsleys from the Green Belt without proving “exceptional circumstances”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16601  Respondent: 15406145 / Paul Moore  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The proposal to remove the Horsleys from the Green Belt without proving “exceptional circumstances”;

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5698  Respondent: 15406177 / Leonilla Frost  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I STRONGLY OBJECT to Policy P2 (Green Belt)

- The environmental impact this development will have on the Green Belt will be severe. My husband and I escaped London to raise our children in this beautiful space and, at these proposals, it will be no longer.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5706  Respondent: 15406529 / David I Allan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY P2

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This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing
development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

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There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5726  Respondent: 15406529 / David I Allan  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. SITES - POLICIES A1 TO A57

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<td>I object to the enclosure of the Green Belt within the planned village boundaries. This is the beginning of a process that will affect the natural environment in which we all live for the future.</td>
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<td>I object to the destruction of and any planned development on the Green Belt surrounding Send village or in the Borough as a whole. I think Guildford has a responsibility to keep green spaces for generations to come, and should not simply build houses to line developers' pockets when there might be suitable sites in brownfield areas.</td>
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<td>Infilling is happening all the time and properties previously occupied by elderly people have been demolished and replaced by monstrous mansions. This is happening in High Park Avenue, and Glendene Avenue. Two bungalows on the latter have been either been made into houses by adding another storey or demolished and replaced by very large properties. These are not in keeping with the character of the Road.</td>
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<td>I object to the removal of villages from the Green Belt.</td>
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Fourthly I strongly object to the plan to inset several rural villages from the Green Belt. The GBC seem to have completely forgotten that people who live in the rural villages in the Borough have chosen a particular lifestyle to live in a rural community and the latest local plan would ruin many people’s lives. The policy is grossly unfair to these people and the local plan should be completely altered so that development only occurs in brown field sites and on the urban edges of main towns. In addition the protection granted to residents for future development would be undermined giving villagers limited ways in which they could prevent unacceptable development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/5814  Respondent: 15408385 / Olga Sitkovetsky  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objection to the Local Plan

I wish to strongly object to the Local Plan on a number of grounds.

Green Belt

I object to the West Horsley being taken out of the Green Belt. The development sites A38, A39, A40 and A41 are clearly areas which should not be included in the Settlement boundary. They are clearly part of the ‘Green Belt’ countryside that surrounds West Horsley.

In addition A41 is starting a creep that will inevitably lead to the joining of West Horsley village to the Northern part of West Horsley and East Horsley.

All of this also has a detrimental impact on the rich wildlife with much of that habitat and wildlife corridors being removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5885  Respondent: 15408513 / Brian Rawling  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

3. I object to not protecting the Green Belt (Policy P2)

I object to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick's Arch (A43). National Planning Policy requires there to be an exceptional circumstance for Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages and the land to be taken from the Green Belt.

There is a real danger that the loss of this Greenbelt will result in a mess of urban sprawl and the neighbouring villages merging into one another. The significance of this development, will result in the character of these villages being lost and the natural habitat and countryside being encroached.

I am bemused to why the existing brownfield site just to the south of the site at Burnt Common, has not been considered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5827  Respondent: 15408609 / John Perrot  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object most strongly to Green Belt land being used for future building. Green Belt is land which should never be built on. The countryside must be protected for the younger generations to enjoy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5831  Respondent: 15410433 / E Grant  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I strongly object to Green Belt land being used for building houses and commercial development, Green Belt land is designated 'Green Belt' to protect open green spaces for future generations.

I object to all the major developments in the Clandon are proposed in the Local Plan. There is no evidence we need all these houses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16687  Respondent: 15410497 / Nick Owen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I would like to object to your proposal to remove Chilworth, where I grew up, from the Green Belt. We have quite enough outer London sprawl as it is; and any economist can explain to you why you can’t build your way out of a housing shortage, just as you can’t build your way out of road congestion (a lesson we learned 20 years ago).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16723  Respondent: 15411457 / Emily Beynon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

But above all, I beg of you to please stand by your pledge to protect the Green Belt and DO NOT ALLOW these plans to go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/5898  Respondent: 15412001 / S Richardson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object most strongly to the Proposal within the Local Plan to use Green Belt land for major development. The Clandons were my home for some 25 years and I visit 2 or 3 times each week and I want my children to enjoy the Green Belt areas around the Clandons which I enjoyed when growing up. Green Belt was designated "Green Belt" to protect our countryside for future generations.

I object to areas of East Clandon becoming a settlement area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5943  Respondent: 15418753 / Scott Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I would like to formally object to the removal of green belt protection from a number of villages in the Guildford area, as proposed in the Guildford Local plan 2016.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5945  Respondent: 15418849 / Sarah Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT most of all to Send being removed from the Green Belt. I thought the whole point of the Green Belt was to have a permanent protection of towns and villages around London to ensure they don’t merge into each other and to ensure sufficient green landscapes to retain our beautiful countryside. Why are Local Councillors and Central Government reneging on a promise in the election to protect our Green Belt?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16751  Respondent: 15418849 / Sarah Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT most of all to Send being removed from the Green Belt. I thought the whole point of the Green Belt was to have a permanent protection of towns and villages around London to ensure they don’t merge into each other and to
ensure sufficient green landscapes to retain our beautiful countryside. Why are Local Councillors and Central Government reneging on a promise in the election to protect our Green Belt?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

The above Society is an informal group of like minded individuals who have been working since 2009 to protect the fields behind Shalford Village Hall from development. A number of members of members of the Society are intimately familiar with the recent history of the this land and stand ready to provide any further information that would assist the Council in understanding the concerns regarding the proposals affecting these fields and ideally to help the Council to draw the appropriate conclusions.

In short, the members of the Society strongly object to tile proposed changes to the Green Belt designation and the change to the Settlement Boundary with regard to the fields behind the Shalford Village Hall.

1. Original intention for the fields:

For a number of years, each time there has been a consultation on the Local Plan we and many, many others have objected strongly to the proposal to remove the Green Belt protection from this site and include it within the Shalford Settlement Boundary.

In short, but much more detail is available on request, this land was originally protected by mutual covenants including the Shalford Parish Council as a Trustee for the Village Hall. The land which includes the Village Hall was given for the benefit of the people of Shalford and the local community in 1985 and suitable covenants imposed on the surrounding land. The current owner of the fields in question would never have been able to purchase them without agreeing to the covenants.

Subsequently, the covenants were released when the Village Hall and Tennis Club wanted to expand and also build the bowling green. At the time the Parish Council was mindful of, and comforted by, the facts the fields were:

- outside the Settlement Boundary,
- part of the Green Belt, and
- designated an Area of Great Landscape Value (AGLV).

1. Lack of Clarity and Certainty in Consultation documentation:

At what appears very short notice it is now proposed to designate the fields as "Open Space (currently being updated to include assessment of villages following insetting)", this proposal appears to arise from a report dated June 2016, hence the feeling of this all being done in a possibly ill-thought through hurry as the Local Plan consultation covering '000s of pages began on June 6th. Further, Open Space is not defined in any Glossary in the consultation documentation. The import of the words in brackets creates considerable doubt as to what has been decided or is intended. Although a Surrey County Council footpath runs past the land (Shalford PFP266) there is no public access to the fields and it is not clear how the Council could utilise the land as Open Space.

Further the consultation proposes that the whole of Shalford is covered by the AGLV protection. It is understood this is an error, although this is not widely known.
It is strongly believed the arguments for changing the Settlement Boundary and removing the Green Belt protection are not justified by this opaque designation as "Open Space (currently being updated to include assessment of villages following insetting)."

The cynical would suspect it is a process to enable development, as once the Settlement Boundary is changed and the Green Belt protection removed it will be eminently possible for developers to undermine the Open Space designation, which seems to be unachievable.

It is understood developers have a contractual obligation to spend significant sums of money seeking planning permission to develop this land and the uncertainty and lack of clarity in the consultation paperwork is opening the door to them. If the Green Belt protection is removed the presumption would be in favour of housing development and the current confusion would open the door to the developers to this land.

1. Strength of local feeling against any development on these fields:

In the last consultation process in 2014 over 700 local signatories signed a petition objecting to the redesignation of the fields behind the Shalford Village Hall. This strength of feeling persists and if it isn't reflected in the volume of objections received on this occasion it should be borne in mind there is an element of consultation fatigue, again it is all at very short notice, during a holiday period, the paperwork voluminous and bewildering and as described above unclear as to what is intended and the potential consequences.

1. Previous advice sought and provided to the Council:

It is not believed anything material has changed regarding this land from the report provided to the Council in 2007 in the Landscape Assessment Study by Chris Burnett and Ass. Which concluded regarding Shalford:

- "A semi-rural landscape persists;
  - Need to ensure long term protection and management of the commons, grass verges and open spaces that exist between the areas of development;
  - The area is especially vulnerable and sensitive to adverse change and could very quickly change to a landscape perceived as part of a continuous urban area and extension of Guildford"

Key vulnerabilities and sensitivities primarily relate to small commons, grass verges and open land that exist between developments. These 'gaps' do not all have formal protection as registered common land and are therefore vulnerable to development as well as smaller scale incremental change such as the creation of car parks and recycling facilities that create more typical urban fringe character. Today, the historic origins at the landscape can still be perceived, although further development could obscure these references by imposing a more homogenous, ubiquitous landscape on the fragmented, piecemeal mix which creates the current character of the area.

Conserve the low key rural character of the roads and Lanes that form the boundaries as this area and avoid upgrading, widening and imposition of formal highways infrastructure. Seek to limit suburbanising elements on the urban edge (lighting, fencing etc.) that detract from the rural character of the area.

The area has similar characteristics to the neighbouring Area of Outstanding Natural Beauty."

In the Society's view nothing significant has changed and these conclusions and recommendations could almost be about the fields behind Shalford Village Hall and Chinthusrt Lane.

A semi-rural aspect does still exist to the east of Chinthurst Lane and any development on the fields would inevitably require the Lane to be widened and upgraded. Is it really the case the trees bounding the Common at the King's Road end of Chinthurst Lane will be sacrificed along with the current characteristics of the area, as described above, to allow a developer to exploit the two fields behind the Village Hall? It is interesting that the consultation paperwork divides
Shalford into a North and South. South Shalford and in particular that area south of the railway line is not urban in character and the proposed changes to the fields behind the Village Hall will jeopardise this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5972  Respondent: 15419425 / Fields Behind Shalford Village Hall Pres (Charles Meade-King)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

In summary the Society objects to this proposal to change the Settlement Boundary and removal of Green Belt protection because:

- A slightly amended existing boundary following clearly defined boundaries would be more logical excluding this and other open land from the Settlement. Removing the Green Belt protection means there will inevitably be an application pursued with vigour at length by developers. The current boundary is clear, physical, recognisable and has proved eminently defendable to date.
- The wording in the consultation is too unclear for us to consult on; there is no definition of 'Open Space' and we don't know the possible consequences of "currently being updated to include assessment of villages following insetting". Why is it proposed to change the AGLV boundary to cover all of Shalford?
- There is no logic in making the proposed changes and then designating the fields as "Open Space". If the Council wishes to avoid the inevitability of a development on this land then the best thing would be to keep the Green Belt protection, not include the fields within the Settlement Boundary and further, declare it Local Green Space and subject to Special Calling it Open Space is, as currently proposed, unclear and likely to be easily overturned by the developers.
- The strongly held views of significant numbers and proportion of Shalford residents (as evidenced by the petition signed by over 700 residents in 2014) and those of the Tennis and Bowling Clubs and Village Hall Committee together with the Parish Council, which is an important voice of the local community, all object to this. The expressed view of the local community is that this land should be left undeveloped. Therefore this intention would be best met by retaining this land in the Green Belt with its additional AGLV protection and outwith the Settlement Boundary. It is understood it could still then be declared Open Space if this is possible and appropriate.
- It is possible that many local residents probably think there is now no longer any threat of the land being developed and therefore do not need to write.
- The history of the fields and the intention for them to be left for the benefit of the people of Shalford and the local community and the basis upon which the covenants were released.
- Chinthurst Lane is not wide enough to accommodate more traffic. The Society strongly believes the Council should work to preserve the low key rural character of the roads and lanes that form the boundaries of this area and avoid upgrading, widening and imposition of formal highways, street lighting and fences which would suburbanise a rural part of the Village.
- These fields contribute to the open character of this part of the village of They rise 32 feet above King's Road. Buildings of any height would change the skyline of Shalford and tower over and detract from the enjoyment of the many users of the tennis, Bowls Clubs, the Village Hall and the Common.

The Society considers that this open land is inappropriate for insetting from the Green Belt and being included within the settlement of Shalford that would have protected this AGLV land. It is possible that Council officers and members are trying to accommodate the wishes of the local community with the Open Space designation. It is however submitted that all three designations should be included in the Plan; Green Belt, AGLV and Open Space with regard to these fields which give a much better chance of them being saved from development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/16753  Respondent: 15419489 / Janet Drew  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Ripley and Send being removed from the Green Belt. This area of Green Belt prevents the joining up of Guildford and Woking and is against the principles agreed by local councillors and central government to protect the Green Belt. The rash of new development being now discussed would just be the beginning.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/475  Respondent: 15419489 / Janet Drew  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I also object to the use of Green Belt land for this development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16758  Respondent: 15419713 / Russell Woods  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to send village being removed from the Green Belt. It was intended to be permanent as required by the National Planning Policy Framework and it is wrong and not justified to abandon it. Without the green belt there is no buffer between Woking and Guildford to prevent it becoming one conurbation. If the Green Belt is lifted there will be nothing to stop developer building and building until our lovely villages in the area are destroyed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5977  Respondent: 15420193 / M.F.T. Freeman  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

As a resident of Shalford and a member of Shalford LTC I wish to make known my objections to the current version of the local plan which removes the fields behind the Village Hall and Tennis Club from the Green Belt and puts them in the Shalford settlement boundary.
Although these fields have been classified as "open spaces" there is no explanation or confirmation to say that this would give them the same degree of protection as the Green Belt from housing development.

Any construction on these fields which are 25ft above the village hall would tower over the tennis courts and bowling green and totally destroy the Green lung of the village.

The considerable traffic from a development would have to exit on Chinthurst lane not only adding to the traffic chaos and pollution but increasing the potential for an accident.

By implementing a small adjustment back to the 2003 boundary GBC could protect these fields and ensure they remain open spaces.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
designated a 'District Centre' which completely misrepresents the village centre, and if accepted, would thereby allow

detrimental future urban development.

In our opinion, and for all the above reasons, this Local plan should be rejected.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/5982  **Respondent:** 15420545 / SE Martin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate?**

( ), **is Sound?** ( ), **is Legally Compliant?**

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In this Local Plan there is a proposal to remove the Horsleys from the 'Green Belt', but the 'exceptional circumstances'
required to be present before taking this action have NOT been demonstrated. Nor have any sound reasons been given for
the extension of the boundaries of the 'settlement areas' of the Horsleys, We also object to 'Station Parade' being
designated a 'District Centre' which completely misrepresents the village centre, and if accepted, would thereby allow
detrimental future urban development.

In our opinion, and for all the above reasons, this Local plan should be rejected.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/5994  **Respondent:** 15420833 / Marjorie Moss  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate?**

( ), **is Sound?** ( ), **is Legally Compliant?**

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I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and
should be the cornerstone of all local planning policy. The Green Belt is not the Council's to give away and once it is
gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future
generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly
protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public
consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of "only" 1.6% of the
borough's Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an "acceptable" percentage. The
fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of
the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to
justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national
guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional
circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be
taken out of the Green Belt. This balancing exercise appears not to have been done.
The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council's growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers' hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the "insetting" of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the openness of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF's other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To "inset" two-thirds of the borough's rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough's location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed "insetting" and boundary extensions go ahead. This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17's aim of "empowering local people to shape their surroundings" and other NPPF provisions.

Paragraph 4.3.17 states that "the general extent of the Green Belt has been retained." I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called 'strategic sites' of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick's Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a 'special circumstance') to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC's Green Belt & Countryside Report does not address Garlick's Arch, so there is no evidence base to support including this site.

Rather than developing Garlick's Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that "allocating these sites does not grant planning permission for development." However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether "exceptional circumstances" existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as II as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless "exceptional circumstances" for development are proven in relation to that specific site, as stipulated repeatedly in the The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPP16/16828  **Respondent:** 15421249 / Mike Hall  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document, complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the many proposals to use the green belt. It’s such a slippery slope. Allowing this amount of development is bound to set a precedent leading to further erosion.

*Growth in housing is out of proportion with natural growth*

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/16830  **Respondent:** 15421633 / Julia Cogan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document, complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Green Belt was implemented for a very important reason – up to now it has been hugely valuable in saving our countryside – I do feel we owe it to future generations to do all we can to preserve the beauty of our country and not have them look back with regret that the green belt was not maintained, when the urban sprawl from London extends outwards engulfing Guildford and Woking and, with no imposed buffer, having no restriction to its spread. The whole point of the Green Belt was to stop such a disaster. How, therefore, can either destroying the Green Belt by huge areas of development or removing sections of the Green belt be even considered when, despite various claims, there is no actual need?

I object to the clear contravention of the government’s commitment for Green Belt protection and the proposals for insetting of the Green Belt which can only open the doors for unscrupulous developers. The Government’s pre-election commitment to protect our Green Belt should be upheld by GBC. I completely understand that the government has set huge targets for housebuilding but we must not give up the green belt for these targets – it is possible to meet these targets without – we must not be influenced by the wishes of developers either wanting to avoid the costs of reclamation of brownfield sites or wanting to take advantage of premium areas to build houses that will command higher value. In any case, the latter are not the housing need and destroying our green belt is not the answer.

The Local plan proposals to build on the Green Belt at Send at Garlick’s Arch, Clockburn Nurseries and Send Hill, and elsewhere in the borough are not justified when we can use urban brownfield areas of Guildford which are already better served by infrastructure. Such building is not justified by any special circumstances and therefore doesn’t justify erosion of the Green Belt. I object to the fact that GBC have failed to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt, and the failure to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/6034  **Respondent:** 15422145 / Orlando Lee  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document, complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
1. I OBJECT to not protecting the Green Belt

I OBJECT to any proposal to take land out of the Greenbelt as is suggested with villages such as Ripley, Send and Clandon as well as sites of Wisley Airfield (A35) and Garlick’s Arch (A43). The National Planning Policy states clearly that it requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt and that housing need is not such an exceptional circumstance.

There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16842  Respondent: 15422145 / Orlando Lee  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to any proposal to take land out of the Greenbelt as is suggested with villages such as Ripley, Send and Clandon as well as sites of Wisley Airfield (A35) and Garlick’s Arch (A43). The National Planning Policy states clearly that it requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt and that housing need is not such an exceptional circumstance.

There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6039  Respondent: 15422401 / N Millete  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I have received your letter of 2nd June concerning the local plan, now revised, and as with precious correspondence I wish to object to the bases of the proposals, and I would refer you to my letter 26th January 2016 which sets out my objection in some detail. I do not propose to repeal the reason for my objections, as age finds this difficult for me, but I suppose my major concern is in respect of the preservation of the green belt which the proposed plan does not respect.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/6055</th>
<th>Respondent: 15422529 / David Roberts</th>
<th>Agent:</th>
</tr>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY P2

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing...
development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/16857  Respondent: 15422625 / Graham Burrows  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the erosion of all green belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16858  Respondent: 15422625 / Graham Burrows  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the removal of any villages within the Green Belt area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6065  Respondent: 15422689 / Felicity Thorpe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

With regard to proposed development in and around Send, I wish to object to the following proposed plans:-

I strongly object to Send Village being removed from the Green Belt. The Green Belt was intended to be permanent, as required by the national Planning Policy Framework, and there are no special circumstances to justify abandoning it. Send's Green Belt provides an essential buffer stopping Woking and Guildford becoming one conurbation. Local councillors and central government gave a clear election promise to protect the Green Belt and this reneges on it. Developers will be quick to take advantage and there will be nothing to stop them. There is plenty of brownfield land still available for developing in the Surrey area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6085  Respondent: 15422849 / Ryan Clarke and Lauren Emberson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I and my partner Lauren are new residents to Ripley and indeed Guildford Borough. Since moving to the area only a few weeks ago, the Guildford Borough Proposed Submission Local Plan (June 2016) has come to attention and we could not help but submit our strong objection to this plan. It either an ill thought out plan or one that prioritises private enterprise over your residents livelihood and that local environment.

We have set out our objections below.

1. **I object to not protecting the Green Belt (Policy P2)**
   I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/16864  **Respondent:** 15423073 / Joanna McNamara  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Firstly, I object to Send Village being removed from the Green Belt. The Green Belt is here for a reason - to stop unlimited development and protect the rural areas surrounding Woking and Guildford from being swallowed up and becoming one large urban area. What reason is there to abandon it?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/16866  **Respondent:** 15423201 / Alex Bailey  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Loss of green belt land**

I object to the plan on the grounds of the loss to green belt land. The Mayor of London has instructed London planners not to approve development on Green Belt Land within the M25. If we continue to build on our countryside it won’t be many decades before we have none left. Creeping development has led to almost continuous housing from Central London to Effingham. Is this to carry on to Guildford and beyond? (1,700 houses are planned for the Guildford end of the Hogs Back and 1,000 new houses on greenfield sites in Normandy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/6121  **Respondent:** 15424865 / Robert Victor Ewen  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to not protecting the Green Belt.

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick's Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a 'special circumstance') justifying the land to be taken from the Green Belt. Once taken, the Green Belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The high relative amount of development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC's Green Belt & Countryside Report does not address Garlick's Arch, so there is no evidence base to support including this site. Rather than developing Garlick's Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to POLICY P2 (6), specifically the new phrasing ‘Limited infilling may also be appropriate outside the inset or identified settlement boundaries, where it can be demonstrated that the site is as a matter of fact on the ground within the village’ referring to Ockham and Wisley, and by extension to other villages with settlement boundaries. We feel this change in language creates less clarity around the purpose of settlement boundaries as regards development policy. This objection is made in the context of the fact that that there is no change to POLICY P2 (5), the intention for East Clandon to have a settlement boundary for the first time, which we have previously and still object to.

We object that GBC are contravening the NPPF framework stipulation in paragraph 87 which states “As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.” (Policy P2, P3, E5). The Guildford Green Belt Group have stated that 70% of new housing will be in countryside and 58% of this is on Green Belt (Gosden Hill, Wisley, Blackwell Farm). This is exceptional in size and thus does not meet the criteria to demonstrate exceptional circumstances. We support instead developing and densification of brown belt and urban areas. According to Policy H13, developments should have a maximum (and minimum) densification policy to prevent developers from using land inefficiently which leads to countryside erosion and ineffective use of brownfield sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to this policy.

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is just not How can it be that building 65% of all new housing on the Green Belt does not cause damage to it?

1. It does not sufficiently safeguard the Green Belt. Sacrificing areas of the Green Belt to an aggressive growth agenda is not sustainable development. The Green Belt was last taken in the 2003 Plan, and now it is again proposed to move the boundaries.

1. The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage.

1. Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

1. The Countryside Study was a simplistic exercise based on the erroneous principle that ranking Green Belt land would identify candidates for development. The Council has not carried out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands, and developers prefer building on undeveloped land rather than brownfield sites.

1. I object to the “insetting” of 14 villages from the Green Belt and to the wholesale extensions to the settlement boundaries in many villages. Effectively, this policy turns each village in the Green Belt into a nucleus for development.

1. Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.
SITES - POLICIES A1 TO A57-sites in the Green Belt

I object to each of the proposals for the Green Belt sites in this list on the following grounds:

1. The identification and allocation of sites in this Plan is made without regard to Green Belt, infrastructure or other constraints. The Plan says that “allocating these sites does not grant Planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification in my view shows that the previous consultations were not intended to change a preconceived development agenda.

Policy P2 Introduction – Objection

1. The removal of green belt protection from the prison site means that it is likely to come forward for housing development. Access to the site will necessarily involve the A3/A247 junction and put additional traffic onto the A247.

Policy P2 Green Belt - Objection

The Plan states: “4.3.16 National planning policy requires that Green Belt boundaries are only amended in exceptional circumstances and that this must be undertaken as part of the Local Plan process. We consider that exceptional circumstances exist to justify the amendment of Green Belt boundaries in order to facilitate the development that is needed and promote sustainable patterns of development.”

1. The Plan fails to demonstrate that exceptional circumstances have been identified for each site that is to be taken from the green belt. The scoring system used to classify pieces of green belt was deeply flawed and assumed that because the housing number could not be accommodated on brownfield or previously developed land in the green belt, it is therefore legitimate to move the boundaries. The Plan implies that it is legitimate to have a blanket change to green belt boundaries to meet the housing number. That is not in accord with the NPPF or ministerial statements.
2. The Plan claims that in fact more housing could be delivered than the OAN which implies that excess land is being taken from the green belt. Doubtless some of Woking B.C’s shortfall will be built in Guildford.
3. The green belt appears to be functioning as a resource to be developed whenever the borough claims it is short of development land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/6219</th>
<th>Respondent: 15426369 / Harvey West</th>
<th>Agent:</th>
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<th>Comment ID: PSLPP16/6247</th>
<th>Respondent: 15426657 / Jean Birkby</th>
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<th>Comment ID: PSLPP16/6246</th>
<th>Respondent: 15426721 / S Mayersheth</th>
<th>Agent:</th>
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<td>Comment ID: PSLPP16/6236</td>
<td>Respondent: 15426849 / Ian Shaw</td>
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I object to Send village being removed from the Green Belt. Send's Green Belt provides an essential buffer, stopping Woking and Guildford becoming one sprawling urban mass. As I understand it our local council and government promised to protect the Green Belt and I would ask this promise to be honoured.

If Send loses its Green Belt status, it will mean more house building, more industrial building, more heavy lorries, more traffic congestion, noise, overcrowded doctors surgeries and added pressure on schools.

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<tr>
<th>Comment ID: PSLPP16/6239</th>
<th>Respondent: 15427073 / Andrew Sharp</th>
<th>Agent:</th>
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Please take this as a formal objection to the insetting of Chilworth. This is an area of natural beauty and should not be developed further.

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<th>Comment ID: PSLPP16/6240</th>
<th>Respondent: 15427105 / Helen Taylorson</th>
<th>Agent:</th>
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There has been no demonstration as to what exceptional circumstances there are for taking East Horsley out of the Green Belt.

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<th>Comment ID: PSLPP16/16526</th>
<th>Respondent: 15427105 / Helen Taylorson</th>
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As a resident of East Horsley for over 25 years I wish to place on record my objection to some of the proposals AFFECTING East and West Horsley in the Guildford Local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6248  Respondent: 15427329 / Christina Shaw  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Send village being removed from the Green Belt. Send's Green Belt provides an essential buffer, stopping Woking and Guildford becoming one sprawling urban mass. As I understand it our local council and government promised to protect the Green Belt and I would ask this promise to be honoured.

If Send loses its Green Belt status, it will mean more house building, more industrial building, more heavy lorries, more traffic congestion, noise, overcrowded doctors surgeries and added pressure on schools.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6258  Respondent: 15427617 / Ken Scotland  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

3. POLICY P2

I OBJECT to not protecting the Green Belt (Policy P2).

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the Borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have
answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. It appears that the Plan has fallen into the developers’ hands, and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of “About Guildford” (published by the Council) on page 5 states that “… the Plan rejects any schemes that would have a detrimental impact on the Green Belt.” This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the Plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the Borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused a lot of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. Mere housing need does not constitute a ‘special circumstance’, so there are no exceptional circumstances for these sites and villages to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The proposed development in these villages will result in the character of these villages being lost and the countryside encroached.

Guidford Borough Council’s (GBC’s) Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development: however, other considerations (e.g. traffic congestion) should preclude the use of this site also.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
Attached documents:

Comment ID: PSLPP16/6280  Respondent: 15427617 / Ken Scotland  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

19. SITES - POLICIES A1 TO A57

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6278  Respondent: 15427745 / Barry Nelson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

National policy attaches great importance to the nature of Green Belt. The Plan does not offer, any, or sufficient, evidence of the exceptional circumstances required to justify allocating Green Belt land for the proposed development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6287  Respondent: 15427969 / Chris Mealing  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

** I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6305  Respondent: 15428097 / Bridget McClellan  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

PERCENTAGE OF NEW HOUSING ON GREENBELT Policy P2
I OBJECT to the large percentage of new Borough housing being built in the current greenbelt. There are more than enough brownfield sites and urban area that require re-development. Those should be used before destroying greenbelt which is an accessible amenity for all.

EAST AND WEST HORSLEY BEING REMOVED FROM THE GREENBELT Policy P2
I OBJECT to East and West Horsley being taken out of the greenbelt. These are green, rural villages with narrow country lanes running through them and contribute to the openness of the greenbelt.

GREENBELT Policy P2
I OBJECT to the wording and content of this policy which states "the general extent of the greenbelt has been retained" we are losing nearly 7% of the greenbelt when including insetting, filling and increasing settlement boundaries.

VILLAGE BOUNDARIES Policy P2
I OBJECT to East and West Horsley's boundaries being greatly enlarged. This will ruin the rural nature of both villages and cause them to become soulless dormitory towns with no heart.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6302  Respondent: 15428129 / K J C Bell  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

No development should occur on green belt land without agreement from the local community. Areas of brownfield sites exist which are suitable for housing development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6317  Respondent: 15428225 / Vian Lee  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to not protecting the Green Belt (Policy P2)
I OBJECT to any proposal to take land out of the Greenbelt as is suggested with villages such as Ripley, Send and Clandon as well as sites of Wisley Airfield (A35) and Garlick’s Arch (A43). The National Planning Policy states clearly that it requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt and that housing need is not such an exceptional circumstance.

There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6350  Respondent: 15428289 / Vicki Donnelly  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I do not want to see Send removed from the Green Belt or joined up with other places creating an urban sprawl. Once this happens it would be for good. The whole of the Guildford – Woking area would be one conurbation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6332  Respondent: 15428897 / David Goodrick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Although I do not live in and around Ripley, I object to the 2016 draft local plan.

I object most strongly to any loss of the green belt. Apart from the Green Belt proving a habitat for wild animals, it provides access to the countryside for thousands of people. It also creates a barrier between urban areas and prevents ribbon development. If the proposed housing development goes ahead, eventually there would be further application to build on even more of the Green Belt, eroding it further.

New house building should be restricted to Brown Field sites only, or by infilling.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6338  Respondent: 15429441 / George Georgiou  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Although I do not live in and around Ripley, I object to the 2016 draft local plan.

I object most strongly to any loss of the green belt. Apart from the Green Belt proving a habitat for wild animals, it provides access to the countryside for thousands of people. It also creates a barrier between urban areas and prevents ribbon development. If the proposed housing development goes ahead, eventually there would be further application to build on even more of the Green Belt, eroding it further.

New house building should be restricted to Brown Field sites only, or by infilling.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing to object to the plan of removing Chilworth from the Greenbelt and thereby removing the protection it offers.

Chilworth has already seen significant number of new homes during the last 10 years and this has increased the pressures on infrastructure and public services such as on the local two schools and doctors surgery. The village is clogged with traffic during rush hours in the morning and evenings which causes chaos for the local residents. This issue does not seem to be addressed in your plan.

You are planning to remove this protection and thereby looking at the maps in your plan are risking the playing fields of the school being sold and built upon. The junior school in the village serves all the surrounding villages and is therefore vitally important that this does not happen. In addition to this you seem to have removed protection from green fields at the east end of the village which would destroy the feeling of the village if built upon. The rest of the village is densely built on so I cannot see any future benefit from the insetting of the village only potential detrimental effects

I therefore strongly object to Chilworth being removed from the greenbelt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1940  Respondent: 15429985 / Jennifer Slade  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Green Belt, Policy 2 at paragraph 4.3.15 - Send Business Park taken out of Green Belt because it is an old, non-conforming user in an area of countryside of outstanding natural beauty, which is also an area of special scientific interest adjacent to the Wey Navigation Canal. Tannery Lane has very restricted vehicular access in both directions; has major junction problems with the A247; is prone to flooding and any further development of this area is inappropriate - not least because it detracts from the openness and effectiveness of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16412  Respondent: 15430049 / Michael Armstrong  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I have enjoyed and lived in Sendmarsh for over 30 years. The green belt is as aspect that has to be retained as it is such a valuable feature of the region and adds hugely to the well-being of commuters, it is such a relief for people to come home knowing there is the tranquility of green belt that surrounds our villages.

During the last 2 decades there has been an enormous increase in traffic in the region, with the M25 and A3. On a daily basis when there is queuing traffic along the A3 at the various intersections, particularly at the junction of the M25: when there is an issue on either of these 2 main roads which are closely linked to the surrounding villages, traffic backs up very quickly having a detrimental effect on the journey of local people going about their daily business, such as going to school/work/hospitals etc.

I have outlined just a few of the concerns I have but have many other concerns too, which is why I feel very strongly against the plans to hugely increase housing and destroy the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6373  Respondent: 15430113 / N Cook  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Proposed Submission Local Plan June 2016}
I object most strongly to Green Belt land being turned over for building purposes. I lived in the Clandons for 20 years and visit the area each day. My leisure and work involve use of the countryside within the Clandons and surrounding villages. Green Belt is land which should never be built on, so future generations are able to enjoy green open spaces.

Worryingly I see it is proposed that areas in East Clandon should be included in a settlement area and also I understand there is a proposal to extend the settlement area in West Clandon, both proposals I object to.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6378  Respondent: 15430305 / Moira Griffin  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the degrading of the Greenbelt to a point when it’s very function is nullified.
I object to the insetting / removing of villages from the Greenbelt. This seems to suggest that buildings and communities are not part of a Rural England.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/6400  Respondent: 15430369 / Sarah Long  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to all insetting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/6401  Respondent: 15430433 / Simon Greenhill  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to all insetting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:
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<th>Comment ID: PSLPP16/6404</th>
<th>Respondent: 15430497 / Martin Chalk</th>
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<td>I OBJECT to all insetting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley.</td>
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<th>Comment ID: PSLPP16/6399</th>
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<td>Gosden Hill Farm site is in the Green Belt and the 'National Planning Policy Framework' clearly states that any new Green Belts should only be established in exceptional circumstances. This Draft Plan does not show sufficient exceptional circumstances to justify its inclusion.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<th>Comment ID: PSLPP16/6432</th>
<th>Respondent: 15431265 / George Clark</th>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<tr>
<td>I am writing to object in the strongest terms to the plan to remove the Villages of Send, Ockham, the Clandons and the Horsley’s from the Metropolitan Green Belt. Our parent's era devised the idea of this green belt in 1935 to stop the ongoing sprawl of London and other cities to give permanently open space, devoid of inappropriate development, and open air for everyone to enjoy. You only have to visit our villages every weekend to find the roads full of cyclists enjoying the countryside and fresh air. To change this policy will mean unethical developers will build on every scrap of land and we will become yet another London suburb -this must not happen.</td>
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<td>Particular to Send, where we live, I object to the underhand planning application for Garlick’s Arch which came to light very late in the planning application process. Send itself already struggles to provide sufficient school places, doctors’ appointments, and bus services and the traffic is already at an unacceptable level at peak times. To add 400 more houses and an industrial area on this small wedge of green belt land is crazy and just greedy on the part of the landowners, who clearly have no conscience for the village and its needs.</td>
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<td>I also object to the plans to build a new interchange onto the A3 at Burnt Common to take all the extra traffic going through our village from the proposed developments -not only at Garlick’s Arch but the proposals for Wisley Airfield, Gosden Hill, Burpham and Blackwell Farm. Send Road and Send Barns Lane is already extremely congested and would become grid-locked.</td>
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<tr>
<td>Finally, I object to the renewed application for 2 travelers’ pitches at Send Hill. This road is extremely narrow and the surrounding countryside a favorite walking spot for many Send residents, let alone visitors to the cemetery [Response has been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to</td>
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eliminate discrimination, harassment, victimisation against persons with a protected characteristic; and to foster good relations between persons with a protected characteristic and persons who do not share it]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: pslp171/727</th>
<th>Respondent: 15432705 / Gordon Bennett</th>
<th>Agent:</th>
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<td>I object removing Send Business Park from the Green Belt (4.3.15).</td>
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<tr>
<td>Send Business park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for it’s insetting (removal) from the Green Belt, and indeed GBC have not even attempted one. Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<th>Comment ID: PSLPP16/6456</th>
<th>Respondent: 15432929 / Stephen Barnett</th>
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<td>We wish to most strongly object to the removal of Chilworth, or ANY Surrey village, from the Green Belt under your proposed Local Plan.</td>
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<td>We question why Surrey village and other residents should have their lives adversely affected and probably be exposed to those profiteering vandals known as property developers just because National Government has failed to implement/control any sensible immigration/population policy (despite promises!). The thinking is profoundly wrong. We should be actively controlling and reducing population (reducing demand) in this tiny island rather than insanely attempting to disproportionately increase housing (supply) to the detriment and discomfort of everyone, especially as we have no hope whatsoever of increasing adequate infrastructure.</td>
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<tr>
<td>We therefore ask you please, just for once, as our Council, to 'man-up' and actually support the wishes of your own electors and fellow Surrey residents and say 'NO' to National Government demands on this. Be a bit defiant for a change! Do you want Surrey covered in concrete? Don't you CARE?</td>
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<td>With luck the EU Referendum result might ease the problem.</td>
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<tr>
<th>Comment ID: PSLPP16/6477</th>
<th>Respondent: 15433377 / Peter Robinson</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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</table>
I am appalled at the attempts to remove the Horsleys from the Green Belt as described within the document.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/788  Respondent: 15433441 / Jacob Green  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the proposal to inset Send Business Park from the Green Belt (Policy 2 at paragraph 4.3.15) because:
  • It is effectively an old non-conforming user in an area of outstanding natural beauty which will be lost forever with consequent impacts on the quality of life of future generations
  • There is highly restricted vehicular access along Tannery lane - in both directions
  • Once again, it eliminates the openness of the Green Belt and is inappropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6479  Respondent: 15433473 / Kay Webb  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the 2016 Draft Local Plan by Guildford Borough Council (GBC) for the following reasons:

I OBJECT to the removal of Send from the Green Belt as the village provides a necessary ‘buffer’ between Woking and Guildford

I OBJECT to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford’s urban brownfield areas, much closer to existing transport hubs

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1054  Respondent: 15433473 / Kay Webb  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the proposal to inset Send Business Park (Green Belt, policy 2, para 4.3.15) from the green belt as it is in a beautiful area of countryside next to the Wey navigation

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<tr>
<th>Comment ID: PSLPP16/6483</th>
<th>Respondent: 15433569 / Jennifer Beddoes</th>
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<td>I object to the removal of villages from the Green Belt.</td>
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<td>I would like to make the following objections to the draft Local Plan:</td>
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<td><strong>Green Belt.</strong> I am very concerned about a plan which proposes that over 70% of new housing be built within the Green Belt. Priority should be given to building on existing brownfield sites before encroaching on Green Belt land. As a resident of Hertfordshire, I am well aware of the threat posed by the destruction of the Green Belt around London and believe that this should be preserved wherever viable alternatives for development exist.</td>
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<td>I object to this the most on the grounds that the natural surroundings that I live in and have existed in the ancient woodland at Gosden Hill would be destroyed forever by greedy developers who have NO regard for the lives of deer, birds, miriad other animals who live in the hedgerows that they want to kill. The green space to the immediate rear of my house would be destroyed and turned into an urban sprawl joining Guildford to West Clandon, with total loss of wildlife in an unimaginable slaughter by traffic on the roads.</td>
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<td>[Summary of redacted paragraph: Objection to 2000 houses and facilities for 9 traveller sites - it would be detrimental to the area; and the proposal has the potential to increase tension between the traveller and non-traveller community which would result in social, economic and environmental impacts]</td>
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<td>The traffic alone that would have to come through the village to rejoin the A3, would cause pollution to rise over 30%, causing huge damage to the health of residents, many of them elderly and children of Merrow Lane and Gosden Hill Road. The damage to the environment would be irreversible and extreme.</td>
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<td>Comment ID: PSLPP16/6526</td>
<td>Respondent: 15433825 / Mary Howard</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>I oppose any unjustified green belt development.</td>
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<td>Brownfield opportunities here are being ignored.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<th>Comment ID: PSLPP16/6552</th>
<th>Respondent: 15434145 / Christine Townsend</th>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>I am writing to object to the Guildford Local Plan.</td>
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<td>I object to building on the Green Belt in any of the designated areas, including Wisley Airfield, Burnt Common and in Send.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<tr>
<th>Comment ID: PSLPP16/6558</th>
<th>Respondent: 15434209 / Brian David</th>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Brownfield sites have not been properly developed.</td>
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<td>No sound reasons have been provided for the proposed changes</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<tr>
<th>Comment ID: PSLPP16/6564</th>
<th>Respondent: 15434241 / Valerie Sowerby</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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</table>
I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ or the land to be taken from the Green Belt. Once taken the green belt is lost forever!!

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object removing Send Business Park from the Green Belt (4.3.15).

Send Business park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for it’s insetting (removal) from the Green Belt, and indeed GBC have not even attempted one. Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6584  Respondent: 15434465 / E N Johnson  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Guildford Borough Council, in its new Local Plan, proposing to remove Green Belt protection from a number of villages in the Guildford area. This includes 'insetting' (i.e. removing from the Green Belt), the village of Chilworth along with the villages of Shalford, Peasmarsh and others.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6592  Respondent: 15434529 / Kate lloyd  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the removal of the Horsleys from the green belt and the proposed developments on the following grounds ; Brownfield sites have not been properly developed.
No sound reasons have been provided for the proposed changes

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6594  Respondent: 15434593 / Eric Mason  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
THE GREEN BELT should never be built on, not for nothing is it called the lung for London, with pollution coming from Heathrow Airport, the M25 motorway and London it is needed more than ever. If the building of houses, offices and roads is ever allowed there will always be an excuse to build more.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6601  Respondent: 15434721 / Charlotte Jordan  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Green Belt and its are environs are a treasured area for people to 'live well, breath and relax' and all these proposals of Housing and Light Industry will take this away forever and contravenes the Governments commitment for Green Belt protection and the people living in it.

Thank you for listening to my objections and reasons why the lovely area we all live in must not be destroyed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6606  Respondent: 15434817 / Peta Hayden  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object very strongly to the Local Plan proposal to build on GREEN BELT

Top priority should be given to SAVING THE GREEN BELT.

The "EXCEPTIONAL CIRCUMSTANCES" under which Green Belt can be developed have NOT been evidenced by GBC, using the flawed data they have come up with in the Draft 2016 Local Plan.

The destruction of rural land is unneccessary and National Policy attaches greater importance on conserving this precious natural resource for wildlife , free from development and pollution that the plan would bring.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6610  Respondent: 15434881 / M G Waugh  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

My principle overarching objection is the proposal to take a number of Surrey villages out of the Green Belt, and East and West Horsley in particular. This proposal in particular will have "urbanisation" implications far beyond those envisaged...
by the mantra that more houses must be built in the Borough. Whilst I fully accept the need to provide additional housing in the Borough, I do not agree with the drastic actions of removing the Green Belt status in order to be able to provide large scale developments that would otherwise be subject to far greater planning scrutiny.

1. I object to your proposal to remove the Horsleys from the Green Belt. The Green Belt was established for a very defined purpose by statute. It was designed to prevent urban sprawl and to a large extent has succeeded in doing this. It is there for the benefit of not just our generation but those that succeed us. This area not only contains many areas of Outstanding Natural Beauty but also Sites of Special Scientific Interest. The Green Belt enables these areas to be protected in order that the Guildford/Leatherhead/Dorking area does not become a suburban sprawl such as Hersham/Weybridge/Walton on Thames.

2. Large numbers of people visit the Surrey Hills area because of its stunning beauty, villages and leisure opportunities. These visitors in turn support many businesses both large and small whose livelihood depends upon the area retaining its rural charm. You simply have to remember that these people are your citizens, your ratepayers and your electorate and changing the nature of their environment will potentially destroy the uniqueness of their busi nesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp171/1316 **Respondent:** 15434913 / Margaret Amos **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate?**

I’m writing regards certain issues outlined in the GBC local plan 2017. Removal of the site A46 for 1,100 homes and a school, I fully support, as the impact on the infrastructure and the greatness of so much development would be overwhelming for our roads, water supplies and flood, electricity, gas and the doctors surgery.

Normandy is a small village community and we value our way of life, and the open spaces, woodland, trees and fields, and the wildlife we share these spaces with.

I do object to your proposal to remove certain areas from the protection of the Green Belt, as this measure usually means allowing an insidious growth of development to occur, which again will have an enormous impact on our roads etc. as things are at present, Westwood Lane, and Guildford Road, and Glaziers Lane are under pressure from surrounding houses, development and high density of traffic.

The cost of all these proposals is not just a monetary one, it’s the cost to our health and well-being as well.

Please reconsider removing the Green Belt status from parts of Guildford Road, Glaziers Lane, Flexford, Walden Cottages, and Palm Hous Nurseries Traveller site, as proposed in your local plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/6665 **Respondent:** 15435361 / A Hanes **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate?**

What are we leaving for a future generation? An urban sprawl, no breathing space and further congestion?
Already we have an infrastructure that cannot cope ie. Schools, roads, hospital

Move houses in Green Belt means more concrete areas affecting water table, more pollution (air and light) A devastating effect on nature and wildlife. Surely Green Belt was meant to protect all this!

There must be many areas better suited to development, brown sites and military non used land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6676  Respondent: 15436001 / Michael Franey  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I was appalled to learn that Guildford Borough Council are proposing under their new Local Plan to remove Chilworth, Shalford and Peasmarsh from the existing Green Belt.

As a resident of Chilworth, I am concerned that a village based in an area of outstanding natural beauty (the Surrey Hills) should be removed from Green Belt listing, which will then allow for unfettered development. This area is popular with ramblers, nature lovers and those just wishing to enjoy the peace and quiet of the Surrey Hills. To remove its Green Belt protected status could open it up to mass development, which will then destroy the very qualities which make it such a charming area attracting visitors from all over the country.

Hence, I wish to raise the strongest of objections to the Council's proposal to remove Chilworth and the other local villages from Green Belt protection

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6679  Respondent: 15436129 / Mark Collinson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing to object to the plans for the Horsleys.

There are no exceptional circumstances to remove the Horsleys from the Green Belt.

The extension of boundaries of the Settlement area is not linked to any advantage to the community or the borough but is just to ultimately lose the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6686  Respondent: 15436961 / Barbara Meredith  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing to object to the plans for the Horsleys.

There are no exceptional circumstances to remove the Horsleys from the Green Belt.

The extension of boundaries of the Settlement area is not linked to any advantage to the community or the borough but is just to ultimately lose the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I also object strongly to the plan to inset, and thereby remove the villages of East and West Horsley from the Green Belt, a dangerous precedent which may well allow future development within the villages. The rural nature of the area attracting great numbers of visitors including walkers, cyclists and campers enjoying this well known area of Surrey.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6690  Respondent: 15437089 / Jamie Manester  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Removal of Send Village from the Green Belt - I object as I thought there was a permanent Green Belt protection in place for Send. There is no justification for this. I am concerned for the adverse impact on the area if agreed to as developers will plan to build out, this will result in significant pressure on local services, infrastructure & the environment

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

GREEN BELT

We object to the GBC Planning Policy team ignoring the “Openness” of the Green Belt land between Normandy and Flexford (recognised as such in the Green Belt and Countryside Study documents).

Such a large development as proposed would bring with it a huge increase in street lighting which would generate significant light pollution. This would be easily visible from the Surrey Hills AONB ruining the view for all time, for residents and visitors to the area

Furthermore, Policy 14 also states that "permission would not be granted for proposals that are likely to materially harm the nature conservation interest of local sites unless clear justification is proved that the need for development clearly outweighs the impact on biodiversity". If there was no "alleged" need for a Secondary School in the West of the Borough, the THBSPA and SSSJ would not allow this site to be taken out of Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6735  Respondent: 15437313 / Sarah Gooden  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
In Conclusion - we object to the fact that Green Belt is being eroded by disproportionate 'strategic sites' without secure funding for infrastructure and road improvements, inset villages, inserting, the manipulation of boundaries, using rural exception sites outside settlement areas for the whole Borough rather than 'needs' of individual rural communities.

Guildford and the surrounding village and countryside will be damaged irreparably.

NPPF 17 requires local authorities to 'take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the greenbelts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving communities within it.' GBC Draft Local Plan does not meet the requirement of Policies S2, H3, P6, 04).

USE BROWNFIELD SITES FIRST

It would seem far more sensible to build more homes on Brownfield Sites first. These should be in or near Guildford town centre - close to the station and existing services eg Woodbridge Meadows, Walnut Tree Close and North Street. Normandy’s station is a tiny rural station (Wanborough) which would in no way support the proposed 100% population increase.

It would be better to provide accommodation for 80-90% of university students on campus, freeing up hundreds of homes in the town - instead of GBC’s proposed 60% of university students living on campus.

Redundant retail space should be turned into homes as there should be no need for massive retail expansion in the town (due to traditional retail activity falls resulting from increased internet shopping habits).

We trust that our comments will be considered carefully by GBC before the Local Plan is finalised.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6716  Respondent: 15437505 / Terri Smart  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy P2

I OBJECT to the many proposals that do not protect the Green Belt in the Borough. The Green Belt constitute s 89% of the borough and the local plan proposes that two thirds of the housing and industrial development is to be built on Green Belt land. The Green Belt was established in perpetuity to protect valuable countryside from the type of development now proposed. The proposals are not occasional,exceptional developments on Green Belt for special circumstances but development on the Green Belt on an enormous scale over various sites in the North East of the borough. By any measure the proposed development s on Green Belt are excessive and unsustainable.

I OBJECT to extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages . The scope for development on the perimeters of Green Belt villages will result in inappropriate encroachment into the countryside.
I OBJECT that in 14 Villages in the Green Belt, "Limited infilling may also be appropriate outside the inset or identified settlement boundaries" as this will encourage large numbers of developments on village edges in the Green Belt which will inevitably impact the openness of the Green Belt.

I OBJECT to the enormous impact on the Green Belt of the proposals for large scale developments on Green Belt land at Wisley Airfield, Gosden Hill Farm, various sites in East and West Horsley and Garlicks Arch at Send. These proposed developments will have a huge impact on our local roads, rail services, medical facilities, shops and other infrastructure and will adversely affect our amenity and our tranquil rural village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6740  Respondent: 15437729 / Terry Worsfold  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We are a village which is part of the Surrey Hills in the same way as Gomshall for example. We are not and do not want to be part of the urban sprawl north of the M25 and therefore our green belt status should be protected.

Of course small scale growth to enable others to enjoy are village is appropriate but 500+ houses is completely unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6744  Respondent: 15437889 / Janet Smith  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Green Belt and Limited Infilling  I object to the removal of the village of Jacobs Well from the Green Belt. Infilling in our village has already led to planning permission being granted for developments which are totally out of character with the surrounding properties.

I object to the use of large swathes of Green Belt land for development. National policy attaches great importance to the openness and permanence of the Green Belt and this openness has a significant part to play in the well being of our population. The heritage of future generations should not be squandered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2725  Respondent: 15438049 / David A Sprigings  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I request that all my objections and comments are shown to the Planning Inspector.

1. I object to the numerous proposals to undermine the Green Belt in various areas of the Borough because the lead party in Guildford Borough Council, Conservative, campaigned for election on their policy of protecting the Green Belt for Guildford Borough residents.

2. I object to the Local Plan as so much of it is dependent on building on or insetting the Green Belt for future building in the Borough as Government advice is very clear - that housing need alone is not adequate grounds for building on the Green Belt.

1. I object to the Local Plan as I believe that no "exceptional circumstances" have been identified to justify the proposed building on Green Belt.

1. I object to any in-setting of the villages of Send, Ripley, Send Marsh/Burgh. This would result in Woking and Guildford becoming one conurbation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6827  Respondent: 15438049 / David A Sprigings  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Local Plan as a whole and to the numerous proposals to undermine the Green Belt in various areas of the Borough because the lead party in Guildford Borough Council, Conservative, campaigned for election on their policy of protecting the Green Belt for Guildford Borough residents. I believe, therefore, that the Council does not have a mandate for its policy of significant undermining of the Green Belt in the Borough, including insetting of numerous villages such as Ripley, Send and Clandon.

I object to the Local Plan as so much of it is dependent on building on or insetting the Green Belt for future building in the Borough as Government advice is very clear - that housing need alone is not adequate grounds for building on the Green Belt.

I object to the Local Plan as I believe that no "exceptional circumstances" have been identified to justify the proposed building on Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10645  Respondent: 15438049 / David A Sprigings  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Local Plan as so much of it is dependent on building on or insetting the Green Belt for future building in the Borough as Government advice is very clear - that housing need alone is not adequate grounds for building on the Green Belt. (Policy P2)

1. I object to the Local Plan as I believe that no "exceptional circumstances" have been identified to justify the proposed building on Green Belt (Policy P2)
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/6761</th>
<th>Respondent: 15438753 / Peter Fairbrass</th>
<th>Agent:</th>
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<td>Document:</td>
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2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/6780</th>
<th>Respondent: 15438945 / Jacqueline Davies</th>
<th>Agent:</th>
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I object to POLICY P2 – Green Belt

- No declaration of support for protecting the Guildford Green Belt, contrary to NPPF and government statements.
- No evaluation of value of local Green Belt as a public and private asset: it’s just treated as potential building land with a few inconvenient restrictions.
- Impact of Green Belt development on local agriculture ignored.
- Impact on rural leisure and tourism ignored.
- Impact on flood control ignored.
- Impact on carbon sink and knock-on effects for air pollution and climate change ignored.
- Impact on biodiversity ignored.
- Impact on natural heritage ignored.
- Impact on water catchment ignored.
- Impact on room for public space amenities (parks, cemeteries, waste facilities etc) ignored.
- Impact on rural business (e.g. mineral mining, film making) ignored.
- Impact on natural landmarks and views ignored.
- Harm to public health and wellbeing (physical, psychological) ignored.
- Allows excessive levels of development in breach of views expressed in last consultation and Conservative Party manifesto commitments at the last local elections.
- Has allowed ruling Councillors to argue that there is an acceptable percentage of Green Belt that should be sacrificed to development, when no such rule exists in the NPPF.
- Ignores alternative approaches, such as fair burden-sharing under which settlements would undertake to accommodate new development in proportion to their size.
- Disproportionate amount of development (most of it, in fact) to be in Green Belt. Too few new homes in urban areas where most people (especially the young and less privileged) want to live. This will act against much needed urban regeneration.
- “Insetting” of most villages disproportionate and unjustified in terms of their contribution under the NPPF to the purposes of the Green Belt. Based on flawed Green Belt and Countryside Study. Idea that most Guildford villages do not contribute to “openness” is subjective.
• Major settlement extensions allow indiscriminate housebuilding, as irregularly shaped villages are squared off to enclose green fields.
• Overall harm to Guildford Green Belt unjustified by any objective development need post-Brexit.
• Ignores most of NPPF 17 stipulations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6805  Respondent: 15439009 / Elisa Castle  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I'm also disgusted to hear we could be removed from the green belt, which will then leave us open for more development in years to come.

Please accept this letter as a rejection against the plans for any development sites to go ahead in The Horsleys.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6809  Respondent: 15439393 / Elise Clements  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The reason we moved to this area was due to the Green Belt area, and these additional homes will virtually make one large new town between Aldershot and Guildford.

I don't believe sufficient plans have been made for infrastructure to support this increase, not only for traffic but also for vital services such as doctors and a hospital. Local surgeries are already under strain with waiting times of up to 2 weeks for non urgent appointments, this can only get worse. Issues with being able to park in Ash Vale to shop already demonstrate how quickly a trouble free trip to the shops can become a nightmare as it has been impossible to park on some occasions since the opening of the Co Op in place of Budgens, there will be far greater requirements for this type of shopping, and no plans for appropriate additional shops or parking.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6810  Respondent: 15439425 / Abigail Cruse  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object strongly to the proposals to remove the following villages from the Green Belt, Ripley, Send Clandon, Wisley Airfield (A35) and Garlicks Arch (A43) NPP states there needs to be exceptional circumstances for both Green Belt...
boundaries to be altered and development on Green Belt – these are not exceptional circumstances. These neighbouring villages will merge into one another as a result of the loss of this Green Belt resulting in urban sprawl and loss of the beautiful countryside.

This could be avoided at Garlicks Arch by developing on existing brownfield site just to the south of the site at Burnt Common where there is surplus land affording development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6854  Respondent: 15439553 / R T P Hume  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing to register our strongest objection to the plan to remove part of the green belt near Guildford including the land round Chilworth, Shalford and Peasmash. The council were never elected to do this sort of urban vandalism and we sincerely hope the plan will be changed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6879  Respondent: 15440065 / R Miller  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I wish to register my objection and concerns for the proposed developments in the Horsleys. I am sure many have eloquently explained the problems we will face. However, I feel I must do the same. I could list many concerns but five or six I am sure, will suffice.

> Removal from the green belt - would be devastating for the way of life we currently enjoy; development would be rife

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6884  Respondent: 15440161 / Linda Daniell  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the use of Green Belt land for building before other options have been fully explored. Surrey is an affluent county. Taken as a whole, there are swathes of land currently used for golf courses. The percentage of golf course land compared to other areas of Britain is excessive. The county and it's borough councils should work to reduce these courses which benefit a small proportion of the general population and work for the greater good.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/6886  **Respondent:** 15440353 / Alison Boyce  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/6898  **Respondent:** 15440513 / Alexandra Gordon  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The enclosure of protected Green Belt land within the proposed new village boundaries (for there will be a presumption for development in the future).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/6901  **Respondent:** 15440513 / Alexandra Gordon  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Send should not be removed from the Green Belt as it is a buffer between Woking and Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/6906  **Respondent:** 15440609 / S Trower  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I am writing to make a formal objection to the Guildford Local Plan 2016 under the public consultation.

The first line of Policy P2 states “we will continue to protect the Metropolitan Green Belt against inappropriate development” and then the policy goes on to totally change the green belt boundaries with a huge and unnecessary development within, so there is an initial and major contradiction in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6909  Respondent: 15440609 / S Trower  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) 

The alteration of the green belt is only allowed under “exceptional circumstances” and these have not been demonstrated in the plan – the inclusion of more housing to meet a vague and unproven need is not an exceptional circumstance – I therefore object to this alteration.

Additionally I object to the removal of West Horsley from the green belt by the extension of the 2003 Local Plan Settlement boundaries – there is no justification for this extension.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6907  Respondent: 15440641 / Ben Lawrence  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) 

This email is to object to the following purposes made by Guildford council:

I OBJECT to Send Village being removed from the Green Belt, we moved to send because of its peaceful and tranquil surrounding. The green belt is there to protect villages like Send from being over run on its small roads. If you remove this it will open the flood gates for developers to completely change what Send is all about. Where is the special circumstances in which this could be justified?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6914  Respondent: 15440705 / Jane Martin  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) 

Letter of Objection Regarding the Proposed Development for The Horsleys in the Guildford Borough Draft Local Plan
As a life-long resident of the Horsleys, I am writing to object to various components of the Proposed Guildford Borough local plan as follows:

I fully oppose the removal of East and West Horsley from the Green Belt as well as oppose the insetting and extending the settlement area boundaries. There is no justification or reason as to why this should occur other than, in my opinion to allow the proposed additional and considerable building in a semi-rural area of outstanding natural beauty.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6944  Respondent: 15440993 / Rebecca Woods  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to send village being removed from the Green Belt. It was intended to be permanent as required by the National Planning Policy Framework and it is wrong and not justified to abandon it. Without the green belt there is no buffer between Woking and Guildford to prevent it becoming one conurbation. If the Green Belt is lifted there will be nothing to stop developer building and building until our lovely villages in the area are destroyed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6945  Respondent: 15441025 / Angela Batterbury  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am a resident in West Horsley and I OBJECT to this village and surrounding areas being taken out of the Green Belt and subsequently houses and entire estates being built, changing completely the geography of the area.

I cannot see how more housing can be an option.

I STRONGLY OBJECT to Horsley being removed from the Green Belt and to the proposed planning developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6948  Respondent: 15441057 / Ruth Busby  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The reasons for my opposition are as follows

Loss of green belt
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<thead>
<tr>
<th>Comment ID: PSLPP16/6958</th>
<th>Respondent: 15441249 / Geoff Nicholson</th>
<th>Agent:</th>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
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<td>the local plan for Burpham erodes green belt whilst there is ongoing new build housing that does take place without loss of green belt. This confirms that an erosion of green built should not take place and is not required</td>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<td>I OBJECT to Policy P2 where Send Village would be removed (inset) from the Green Belt. The intention of designating land as Green Belt is for it to permanently remain so, to prevent development on it, to provide protection for wildlife and countryside, and to provides buffers to prevent the creation of conurbations through the joining together of existing local communities. To abandon Send’s designation of being Green Belt, flies in the face of all these intentions. The National Planning Policy Framework requires that Green Belt remains so, and there are no justifications for removing Send’s designation as Green Belt that can be considered ‘special circumstances’. Send must NOT become a Local Rural Centre. Send MUST remain wholly Green Belt.</td>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/6989</th>
<th>Respondent: 15442049 / Ellouise Fassom</th>
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<td>I OBJECT to not protecting the Green Belt (Policy P2) This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is</td>
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gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of “About Guildford” (published by the Council) on page 5 states that “...the Plan rejects any schemes that would have a detrimental impact on the Green Belt.” This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.
In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/6991</th>
<th>Respondent: 15442081 / Lauren Fassom</th>
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I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

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The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.
I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

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I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

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There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I wish to most strongly object to Guildford Borough Council’s proposal to remove Green Belt Protection from a number of villages including Chilworth, Shalford and Peasmarsh. This would remove protection against development when the Council should be protecting the area and preserving the countryside for future generations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to any building on the Green Belt in Send at Garlick’s Arch, Clockbarn Nurseries or Send Hill because there are no special circumstances to do so and the Green Belt is supposed to be permanent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object removing Send Business Park from the Green Belt (4.3.15)

Send Business Park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for it’s removal from the Green Belt, and indeed GBC have not even attempted one. Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I Object to the insetting of villages from the Green Belt because:

- The present "washed over" status should be maintained to prevent inappropriate development in villages
- Need to preserve village character which is part of the green belt and essential to it
- This policy contradicts the aims of P Spooner leader of the Council who wants to keep Guildford Borough very special and beautiful.
- This policy content contradicts the plan statement "We will continue to protect the green belt"
• East Horsley is a rural village with an attractive woodland character which enhances the local green. It is an integral part of the green belt and development of East Horsley should not be considered separately from the surrounding green belt countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7127  Respondent: 15442721 / Elizabeth Robson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the allocation of sites in the green belt for development purposes because:

• There has been no justification of exceptional circumstances which is required
• The green belt should be protected for all the people who live in the South East who derive benefit from visiting it and travelling through it. This is not NIMBYism.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7112  Respondent: 15442753 / Anne Morgan  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

• loss of the green belt - the proposed insetting of East Horsley. If the green belt is constantly eroded, we are in danger of losing our countryside, which apart from being beautiful, is a resource for everyone, necessary for good physical and mental health and a vital resource to uplift the human spirit both now and for future generations. Once we have lost our countryside, it is lost for ever. This decision affects our children and our grandchildren. It is not selfish, inward-looking nimbysism.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7118  Respondent: 15442785 / Tammy Hoar  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to Send Village being removed from the Green Belt. The Green Belt was intended to be permanent, as required by the National Planning Policy Framework, and there are no special circumstances to justify abandoning it. Send Green Belt provides an essential buffer stopping Woking and Guildford becoming one conurbation. Local councillors and central government gave a clear election promise to protect the Green Belt and this reneges on it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
3. POLICY P2

I OBJECT to not protecting the Green Belt (Policy P2).

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the Borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. It appears that the Plan has fallen into the developers’ hands, and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this
policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the Plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the Borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused a lot of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. Mere housing need does not constitute a ‘special circumstance’, so there are no exceptional circumstances for these sites and villages to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The proposed development in these villages will result in the character of these villages being lost and the countryside encroached.

Guidford Borough Council's (GBC’s) Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development: however, other considerations (e.g. traffic congestion) should preclude the use of this site also.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1) I object to Send being removed from Green Belt. To remain a village not to become a town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7192  Respondent: 15445665 / Jonathan Hewlett  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I OBJECT TO THE DRAFT LOCAL PLAN FOR THE FOLLOWING KEY REASONS:

1)

2) I object to a plan which proposes that over 70% of new housing be built within the Green Be There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7199  Respondent: 15445697 / Jane Mary Hall  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

2. I object to the removal of East and West Horsley from the Green Belt with no demonstration of 'exceptional circumstances'

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7200  Respondent: 15445697 / Jane Mary Hall  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
3. I object to the East Horsley village being inset rather than washed over as this would permit even more development whilst doing nothing to improve the roads/lanes or providing more schools places both junior and Senior. The movement of the boundaries within East Horsley would allow building on Kingston Meadow beside the Village Hall which is an important recreational space within the village. The cars would be using an already dangerous junction with Ockham Rd North, the shops and Station Approach.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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4. Removal of open land and replacing it with hard landscape will make flooding more of a problem.

I OBJECT to the destruction of the Green Belt without evidence of need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to Send village being removed from the Green Belt, there are no special circumstances to justify it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.
There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7257  Respondent: 15446145 / Nigel & Jane Simpson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. We object to the settlement boundary which has been imposed on East Clandon without any consultation. This imposition provides no protection to further development outside of the settlement boundary (Policy P2, para 4.3.25) and is deemed by us as being unnecessary in an already tightly developed ancient and rural conservation village with high archaeological potential. We demand that this proposal be removed as it will endanger the openness of the greenbelt, the views in and out of the area of natural beauty (protection of the AONB Policy) and the character of our village.

2. Policy P2 - greenbelt: we object to the significant erosion of the greenbelt with the proposals for large towns being developed on greenbelt land thereby removing the openness of the greenbelt. We note in particular the large developments proposed for the north east quadrant of the Borough which will adversely affect our amenity. but also unfairly targets our tranquil rural villages because we can provide dormitory facilities for commuters to London. The developments directly affecting our villages are the proposals for Wisley Airfield, Gosden Hill Farm, various farms and tracks in the Horsleys and Garlicks Arch at Send.

4. Further, with regard to the erosion of greenbelt, we object that Policy P2 is not met where it states that greenbelt should be protected. We object to the disproportionate use of greenbelt land for housing–some 65% of the housing proposed is on greenbelt and with little consideration being given to redevelopment of brownfield sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7254  Respondent: 15446305 / Mo Adda  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I utterly object to the 2016 draft local plan for many reasons: the loss of green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attachments:

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Comment ID: PSLPP16/7259  Respondent: 15446401 / Louise Yandle  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attachments:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to a plan which proposes over 70% of new housing is built within green belt. There is enough brownfield land to be built on so no need to build on Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14361  Respondent: 15446401 / Louise Yandle  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY P2 (GREEN BELT):
- No declaration of support for protecting the Guildford Green Belt, contrary to NPPF and government statements.
- No evaluation of value of local Green Belt as a public and private asset: it’s just treated as potential building land with a few inconvenient restrictions.
  - Impact of Green Belt development on local agriculture ignored.
  - Impact on rural leisure and tourism ignored.
  - Impact on flood control ignored.
  - Impact on carbon sink and knock-on effects for air pollution and climate change ignored.
  - Impact on biodiversity ignored.
  - Impact on natural heritage ignored.
  - Impact on water catchment ignored.
  - Impact on room for public space amenities (parks, cemeteries, waste facilities etc) ignored.
  - Impact on rural business (e.g. mineral mining, film making) ignored.
  - Impact on natural landmarks and views ignored.
- Harm to public health and wellbeing (physical, psychological) ignored.
- Allows excessive levels of development in breach of views expressed in last consultation and Conservative Party manifesto commitments at the last local elections.
- Has allowed ruling Councillors to argue that there is an acceptable percentage of Green Belt that should be sacrificed to development, when no such rule exists in the NPPF.
- Ignores alternative approaches, such as fair burden-sharing under which settlements would undertake to accommodate new development in proportion to their size.
- Disproportionate amount of development (most of it, in fact) to be in Green Belt. Too few new homes in urban areas where most people (especially the young and less privileged) want to live. This will act against much needed urban regeneration.
- “Insetting” of most villages disproportionate and unjustified in terms of their contribution under the NPPF to the purposes of the Green Belt. Based on flawed Green Belt and Countryside Study. Idea that most Guildford villages do not contribute to “openness” is subjective.
- Major settlement extensions allow indiscriminate housebuilding, as irregularly shaped villages are squared off to enclose green fields.
- Overall harm to Guildford Green Belt unjustified

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7265  Respondent: 15446433 / Gavin knight  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
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<th>Respondent: 15446561 / Peter Hoar</th>
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<td>Firstly the idea to remove the Green Belt I am particularly unhappy about, this will mean us losing all green areas and we will have no countryside left, which is so important for the environment.</td>
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<td>I object to Send village being removed from the Green Belt. This is in direct conflict of clear election promises made by both local and central governments.</td>
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<td>I object to the proposals to remove the villages of Ripley, Send and Glandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick's Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt There are no exceptional circumstances for these villages and the land to be taken from the Green Belt, once taken from the green belt is lost forever.</td>
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There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC's Green Belt & Countryside Report does not address Garlick's Arch, so there is no evidence base to support including this site.

Rather than developing Garlick's Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the extended development in the Green Belt (Policy P2, Site A43)

I object to Garlick’s Arch (A43) being extended and the resulting urban sprawl. There are no exceptional circumstances for this site being removed from the Green Belt, as required by the National Planning Policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the removal of any local villages from the Green belt. It would seem that the current plan is for a disproportionate amount of development in one small area of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT TO SEND VILLAGE BEING REMOVED FROM THE GREEN BELT. The Green Belt was intended to be permanent as required by the National Planning Policy Framework. Send’s Green Belt provides an essential buffer between Woking and Guildford providing an essential area preventing the area becoming one sprawling conurbation. Specifically I live at the bottom of Potters Lane directly adjacent to the River Wey. There is a plethora of wildlife on the Wey to include deer, swans, cormorants, migrating geese, fox, badger, numerous fish species, snakes, barn owls, birds of prey, bats, kingfisher to name but a few species. Increased urbanisation and the associated congestion and the
effects of an increase in population will bring an increase in pollution, pressure on the river with increased flood risk that will be both aesthetically detrimental to the scenic beauty and have a significant negative impact on both the wildlife and incumbent long established human habitation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the Proposal to remove the Horsleys from the Green Belt. The exceptional circumstances required before taking this action have not been demonstrated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the Extension of the boundaries of the Settlement area of the Horsleys; no sound reasons have been given for the proposed changes which seem to be aimed solely at increasing the land available within the settlements for future additional development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the potential for damage to the environment: Policy P2, represents a complete failure to protect the Green Belt. The alteration of GB and Parish community boundaries is not justified, it is a goal post moving exercise to allow Planning permission to be easier.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the 2016 Draft Local Plan. In particular, I would comment as follows:

it is unacceptable that Green Belt land is being used for development

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10821  Respondent: 15448289 / Paul Miller  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to all insetting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7368  Respondent: 15448321 / Nicole Mapplebeck  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from
the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of “About Guildford” (published by the Council) on page 5 states that “… the Plan rejects any schemes that would have a detrimental impact on the Green Belt.” This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

As a West Clandon resident I am extremely concerned that the removal of these sites will result in the merging of our Green Belt village with the developments on the outskirts of Guildford, making a complete mockery of the term Green Belt. Our village character will be lost for ever if this happens, so we must try above all else to retain our Green Belt, not build on it.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7369  Respondent: 15448353 / Emily Roberts  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

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I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored.
Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

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As a West Clandon resident I am extremely concerned that the removal of these sites will result in the merging of our Green Belt village with the developments on the outskirts of Guildford, making a complete mockery of the term Green Belt. Our village character will be lost for ever if this happens, so we must try above all else to retain our Green Belt, not build on it.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

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Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/7370 **Respondent:** 15448385 / Edward Bates **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is **Sound?** ( ), is **Legally Compliant?** ( )

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing to object to the proposals for the above developments

I object to Send and Ripley villages being removed from the Green Belt with regard to the proposals identified by the Local Plan. Please see below for detailed reasons.

Local Councillors and central government gave a clear election promise to protect the green belt. This reneges on it. I particularly voted in accordance with my wish to preserve the green belt and to ensure that Guildford council had good representation in it. I feel let down by my local government when I read these proposals. I choose to live in this area and make a contribution to it (I was not born or brought up here) as I have valued the semi-rural nature and convenience of the landscape but should these proposals go forward I will move out.

Loss of the Green Belt

My most important objection is the removal of the villages of Send and Ripley (and other surrounding villages) from the Green Belt. This was a particular electoral objective of mine. I am not alone as I know that other nearby boroughs have expressed concern at some of Guildford’s plans.

The Green Belt was intended to be permanent, as required by the National Planning Policy Framework, and there are no special circumstances to justify abandoning it. Send and Ripley’s green belt provide an essential buffer stopping Woking and Guildford becoming one sprawling area.

The fundamental aim of the Metropolitan Green Belt is ultimately to prevent the spread of London. It feels that my local borough considers Green Belt issues to be at the bottom of their priorities despite the feelings of their electorate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1861   Respondent: 15448897 / Ruth Brothwell   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the proposal to inset Send Business Park from the Green Belt because this will adversely affect the nature of the surrounding countryside situated so close to the Wey Navigation. Expansion and development of this area goes against Green Belt intentions regarding the openness of the countryside. It is inappropriate.

Access along Tannery Lane is very difficult in both directions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7496   Respondent: 15449409 / Margaret Ashmore   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Guildford Council stick to your policies with regard to what you are protecting.
I REPEAT GREEN BELT MUST STAY and not be built on.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2400  Respondent: 15449409 / Margaret Ashmore  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to this plan in total. All the villages within this plan would not benefit at all in fact on the contrary, it would be a disaster. They are all steeped in history and MUST REMAIN in the Green Belt which you have said time and time again you would uphold, there appears to be no consideration for the wild life in these areas or in this plan. I personally have enjoyed having the deer visit our roads and fields, if we lose this they and many other wild animals and birds, through your TRESPASS into their habitat (Green Belt) will never return.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7509  Respondent: 15449665 / Robin & Victoria Doelly  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We live happily close to Effingham Junction...

I would like to raise our concerns and objection to the large scale development plans proposed around Horsley.

This should remain a green belt area and I have not heard sound reasons to change this or remove under 'exceptional circumstances' the protection that his area has for the enjoyment of all and preservation of our country and countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7512  Respondent: 15449857 / Fiona Cumberland  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

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<th>Respondent: 15449889 / Harriet Bell</th>
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Green Belt: I was absolutely appalled to read that you would contemplate taking the (2-villages of Send & Ripley out of the green bell. We voted for a Conservative Council to protect our rights, not blatantly ride roughshod over them The very mention of losing the greenbelt status in our little village is a betrayal of what we thought you stood for and I strongly object 10 this.

Apart from destroying the very reason I moved into Send 22 years ago to be in a quiet village environment, there is currently greenbelt land at the end of Send Hill that was divided into hundreds of plots and sold off to individuals on the premise that one day, it may lose its green belt status. If the green belt were to be removed the flood gates would be opened to wipe out our village life and destroy our community.

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I object to not protecting the Green Belt (Policy P2)
I object to removing Ripley, Send and Clandon from the Green Belt. I have actively chosen to buy a house in a village setting within the Green belt and do not wish to see this consumed by the urban growth of Guildford. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

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I object to POLICY P2 – Green Belt

- No declaration of support for protecting the Guildford Green Belt, contrary to NPPF and government statements.
• No evaluation of value of local Green Belt as a public and private asset: it’s just treated as potential building land with a few inconvenient restrictions.
• Impact of Green Belt development on local agriculture ignored.
• Impact on rural leisure and tourism ignored.
• Impact on flood control ignored.
• Impact on carbon sink and knock-on effects for air pollution and climate change ignored.
• Impact on biodiversity ignored.
• Impact on natural heritage ignored.
• Impact on water catchment ignored.
• Impact on room for public space amenities (parks, cemeteries, waste facilities etc) ignored.
• Impact on rural business (e.g. mineral mining, film making) ignored.
• Impact on natural landmarks and views ignored.
• Has allowed ruling Councillors to argue that there is an acceptable percentage of Green Belt that should be sacrificed to development, when no such rule exists in the NPPF.
• Ignores alternative approaches, such as fair burden-sharing under which settlements would undertake to accommodate new development in proportion to their size.
• Disproportionate amount of development (most of it, in fact) to be in Green Belt. Too few new homes in urban areas where most people (especially the young and less privileged) want to live. This will act against much needed urban regeneration.
• “Insetting” of most villages disproportionate and unjustified in terms of their contribution under the NPPF to the purposes of the Green Belt. Based on flawed Green Belt and Countryside Study. Idea that most Guildford villages do not contribute to “openness” is subjective.
• Major settlement extensions allow indiscriminate housebuilding, as irregularly shaped villages are squared off to enclose green fields.
• Overall harm to Guildford Green Belt unjustified by any objective development need post-Brexit.
• Ignores most of NPPF 17 stipulations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7649  Respondent: 15450881 / Ann Owen  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I understand that you are planning to remove Chilworth, Shalford and Peasmarsh, as well as number of other villages in your borough from the Green Belt.

I am writing to you to protest against this proposal in the strongest possible terms.

The Green Belt planning policy was introduced for a reason, a very good one. It is not acceptable to simply remove that restriction because it prevents large corporations from making money. I appreciate that construction companies can’t make large profits from regenerating old areas and renovating old buildings, but planning laws do not exist to allow companies to make money. They exist to protect the people and the land from exploitation. You are proposing to exploit this land and it’s people, which is both unethical and immoral. Deregulation has currently brought our country to it’s knees - deregulating these areas of Green Belt can only add to the chaos.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to not protecting the Green Belt (Policy P2)
I thoroughly object to removing Ripley, Send and Clandon from the Green Belt. I have purposely chosen to buy a house in a village setting within the Green Belt and do not wish to see this consumed by the urban growth of Guildford. There are no exceptional circumstances for these villages and sites to be removed, which is the criteria required by the National Planning Policy to do this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlick's Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Removal of Green Belt (Policy P2)
Ripley, Send, Clandon and sites at Wisley Airfield (A35) and Garlick's Arch (A43) must not be removed from the Green Belt, I object to the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed from the Green Belt, as required by the National Planning Policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Removal of Green Belt (Policy P2)
Ripley, Send, Clandon and sites at Wisley Airfield (A35) and Garlick's Arch (A43) must not be removed from the Green Belt, I object to the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed from the Green Belt, as required by the National Planning Policy.
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to not protecting the Green Belt (Policy P2)

I object to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
No consideration has been made in the revised proposals for the principle enshrined within the NPPF that exceptional circumstances must be demonstrated in order to develop within the Greenbelt. The proposal to inset the village of East Horsley has not been justified by exceptional circumstances. No account appears to have been made in the revised plan to the overwhelming body of public opinion that objects to the development of the greenbelt and which advocates the development of brownfield sites as priority. I object to the development of new accommodation on the Greenbelt and to the proposal to inset the village of East Horsley and others.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<tr>
<th>Comment ID: PSLPP16/7730</th>
<th>Respondent: 15451905 / Jonathan Withers</th>
<th>Agent:</th>
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<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Respondent: 15451937 / Alistair Jackson</th>
<th>Agent:</th>
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Yes, we are fortunate enough to have Green Belt around us, but Green Belt was established to protect our rural areas from this very kind of concrete ambush. By changing the boundaries we will be removing a safety barrier that has protected our area from being smothered by development in Woking, Guildford and Leatherhead.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<td>I object to any proposal to take land out of the Greenbelt as is suggested with villages such as Ripley, Send and Clandon as well as sites of Wisley Airfield (A35) and Garlick’s Arch (A43). <strong>The National Planning Policy Framework clearly states that it requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt and that housing need is not such an exceptional circumstance. There are no exceptional circumstances for these villages and the land to be taken from the Green Belt as mere housing need does not constitute a ‘special circumstance’</strong>.</td>
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<td>There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The Green Belt was put in place to prevent this very thing from happening and ignoring this policy is unthinkable. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt &amp; Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.</td>
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<td>Whilst appreciating the need for affordable homes, I fear this erosion of our green belt will be detrimental for the future. Open countryside needs to be protected around towns for the good of the environment and the nation's physical and mental health. As a parent of a teenager who has suffered greatly with the latter I recognise the importance of having</td>
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green open spaces within easy walking distance where one can lose oneself in the freedom of nature. A city park, or fenced in recreation areas just won't 'cut it'. We have to protect our natural countryside before it is lost forever.

I strongly urge you to reconsider this plan and consider my strongest objection to it

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7782  Respondent: 15452289 / Claire Miller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7791  Respondent: 15452385 / Alasdair Good  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I would like to register objections to Guildford Borough Council Proposed Local Plan (June 2016) and inclusion in the plan of proposed multiple development sites in the Horsleys:

Urbanisation of the Green Belt

I strongly object to removal of the land areas in the vicinity of the Horsleys from the Green Belt. The Green Belt prevents urban sprawl and retains important wildlife corridors in proximity to the highly urbanized areas of outer London. It helps maintain clean air quality and provides recreational areas for urban dwellers from both Greater London and adjacent conurbations.

There are five legal reasons for protection of land assigned as Green Belt:

1. To check the unrestricted sprawl of large built up areas
2. To prevent neighbouring towns merging into one another
3. To assist in safeguarding the countryside from encroachment
4. To preserve the setting and special character of historic towns
5. To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

The provision of the Green Belt in the vicinity of the Horsleys meets the criteria listed above. The National Planning Policy Framework (NPPF) requires any change of Green Belt boundaries to demonstrate exceptional circumstances. Unmet housing need is not an exceptional circumstance in law. In addition the existence of the Green Belt/AONB is a reason for not meeting objectively assessed housing need (i.e., such protected land is a legal constraint against any such development). The proposed Local Plan has not demonstrated exceptional
circumstances requiring additional housing in the vicinity of East and West Horsley. Removal of Villages from the Green Belt

I strongly disagree with and object to the assumption made in the Proposed Submission Plan that it is reasonable to remove villages such as West and East Horsley from the Green Belt. It seems remarkable that a single act of Parliament by the current Government can undo the good work for the provision of the Green Belt and protection of rural England laid out in the Town and Country Planning Act of 1947. The rationale behind the need to protect rural areas in close proximity to ever growing metropolitan areas is more relevant today than ever, in light of the projected growth in UK population.

I object to the method of defining settlement hierarchy as described in the Proposed Submission Local Plan. In particular, I take exception to the "classification" of East Horsley as a "Semi Urban village" and question the basis for this classification. Horsley lacks most of the infrastructure and community facilities taken for granted in an urban area. The key charm and attraction of Horsley is essentially it's rural character.

To accrete large numbers of new houses to the Horsley - Okham area would change the character of these ancient villages permanently, resulting in a detrimental impact on the environmental and village character. I therefore object to the proposed settlement boundary changes in East and West Horsley.

In summary, I strongly object to the proposal in the Proposed Submission Local Plan to take the following villages out of the Green Belt: East Horsley and West Horsley (North), Effingham, Ripley, Shere and West Horsley (South).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7797  Respondent: 15452449 / Carl Sjogren  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1887  Respondent: 15453889 / Teresa Van Den Bosch  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

However I object to the removal from the Green Belt of homes in Guildford Road, northern end of Glaziers Lane, Flexford, Walden Cottages and Palm House Nurseries traveller site which contribute to the 'openness' of the Green Belt.

I also object to the assertion in Policy P2 Green Belt para 4.3.13 that Normandy and Flexford are now inset from the Green Belt which effectively redraws the Green Belt boundary with no evidence provided of the 'exceptional circumstances' required. I feel it is important for the two settlements of Flexford and Normandy to remain 'washed over' by the Green Belt so they may maintain their separation and unrestricted views out to the surrounding countryside to support the 'openness' of the Green Belt. Policy P2 fails to appreciate the importance and permanence of the
Metropolitan Green Belt and the fact that it needs to be permanently protected to check the unrestricted sprawl of built up areas, to safeguard the countryside from encroachment, to prevent neighbouring towns from merging into one another and to encourage the recycling of derelict and other urban land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7901  Respondent: 15454465 / Marissa Draper  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to all in setting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7906  Respondent: 15454497 / Rick Parker  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to all in setting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7907  Respondent: 15454529 / Janet Tarbet  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7908  Respondent: 15454561 / Charles Dadswell  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to all in setting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7909  Respondent: 15454593 / Jack Dadswell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7832  Respondent: 15454625 / Paul Woy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

As a resident of Surrey since birth, and currently working in Ockham, I would like to object to GBC’s Proposed Submission Local Plan unreservedly. The gradual encroachment on the Green Belt is having a detrimental effect on the quality of life for all who live and work in this area. I have written regarding this matter twice before and, as a local resident working in the area, have objected to all the proposals the GBC has put forward along with thousands of others in our area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7912  Respondent: 15454657 / Tracy McGuigan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The removal of Ripley, Send and Clandon from the Green Belt. The National planning policy requires special circumstances to be present – there are no special circumstances evident. I therefore object on this basis. Brownfield site development around Burnt common is a far more logical approach rather than damaging the environment by building and subsequently by increased traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7919  Respondent: 15454913 / A Burston  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7920  Respondent: 15454945 / Claire Cassar  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to all in setting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15092  Respondent: 15454945 / Claire Cassar  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The National planning policy requires special circumstances to be present – there are no special circumstances evident with reference to the removal of Ripley, Send and Clandon from the Green Belt

Brownfield site development around Burntcommon would provide a much more sustainable approach and reduces the environment damaging likely to result from the proposed building plan.
I'm writing to object to the proposed local plan. I OBJECT to the removing the local villages from the green belt as this goes against all recent promises to retain the green belt and keep it intact. The outcome in my view would be the lose of the villages as individuals, as individual practitioners will undoubtedly link them all and become one, creating areas not villages. The local council promotes Guildford as being a vibrant town set amongst rural countryside and towns and villages. Ok the town might stay the same but what would make people want to visit if it is just another town among others and sprawling housing, because that would become the situation, you don't have to look far to see the reality, and would you want to visit the re.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7842  Respondent: 15455009 / Emma Graham  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to all in setting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/7922  Respondent: 15455073 / Amanda Fletcher  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to all in setting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7924  Respondent: 15455105 / Kate Robinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to all in setting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7911  Respondent: 15455201 / Edith Dadswell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to all in setting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7859  Respondent: 15455233 / Andrew Hamilton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages and the land to be taken from the Green Belt. Once taken the green belt is lost forever.
There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/7885  **Respondent:** 15455649 / Barry Lane  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to these plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/7902  **Respondent:** 15455777 / Paul Jones  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object that you propose that Horsleys be removed from the green belt. I can see no justification for this being made, with no exceptional circumstances being proposed or supported. These villages should not be withdrawn from the Green belt. This would seem to make it easier to build new homes with a broad brush stroke. This is not how development should be conducted in long standing village communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/7948  **Respondent:** 15456097 / Sheila Mellstrom  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object strongly to GBC Draft Plan which continue to include Wisley Airfield even though planning permission was rejected by you the planners - for the following reasons

1. I object strongly to any building in the Greenbelt on which we have been promised by the Government that no building will take place

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<th>Comment ID: PSLPP16/7935</th>
<th>Respondent: 15456129 / Jean Harding</th>
<th>Agent:</th>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
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<td>I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.</td>
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<th>Comment ID: PSLPP16/7962</th>
<th>Respondent: 15456481 / Doreen Harris</th>
<th>Agent:</th>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
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<td>My name is [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] and I am against the overall building proposals that will encroach upon land in the Horsley area.</td>
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<td>I object to any proposal that intrudes on the Green Belt area. There is no special circumstances that prevail to even consider this. As you are aware, that land taken for this project will then be lost forever.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<th>Comment ID: PSLPP16/7966</th>
<th>Respondent: 15456545 / Paul and Lynn Cozens</th>
<th>Agent:</th>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
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<td>We wish to object to the proposed local plan. The greenbelt was created to prevent urban sprawl and overdevelopment. Proposed greenbelt destruction confirms the point of overdevelopment has been reached and should not be permitted. Respect why greenbelt was created in the first place.</td>
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I am writing with the aim of recording my objection to the Guildford Local Plan 2016. I understand that part of the plan includes the removal of Green Belt protection from a number of villages in the Guildford area. The Green Belt status was put in place for a reason. Removal of Green Belt status to allow for housing development is unacceptable and unjustifiable. While I understand the necessity for more housing, I believe this could be fulfilled using housing that is currently derelict/vacant and by using brown field sites. Such sites are not as attractive to developers, however if they wish to profit from housing development they should be forced to use such sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to the 2016 Draft Local Plan for Horsley, Ripley, Send and Clandon

Our villages are based on agricultural environment in the green belt and what you are suggesting with the plans opens up building program that will totally destroy our villages, way of life and the green belt for ever. In the past development has been gradual and infra structure has been planned. There are places in Surrey/Sussex and I am sure all over the country where massive building has occurred and totally changed the area unrecognisably.

1. I object to all erosion of green belt.
2. I object to any “in-setting”/removal of any villages from green belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Once our green belt is gone its gone for good and England will no longer be a green and pleasant land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

1. I object to all erosion of green belt.
2. I object to any “in-setting”/removal of any villages from green belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
64.9% of all proposed sites in the plan are on Green Belt land – some 8000 houses. This is NOT acceptable and is certainly not GBC’s position to give this protection away. The Green Belt was setup to protect our open spaces from the very thing the GBC are planning. We all have a duty of care to up hold the Act and ensure that the GREEN BELT IS NOT ERODED - ONCE ITS GONE, ITS GONE FOREVER.

There are NO exceptional circumstances to enable this prosperous plan and it sets a dreadful precedent for conservation and represents a threat to the public health, wellbeing and quality of life of not only local residents but wider urban areas and future generations.

Our Green Belt Policy is set in law and is a living example of sustainability and is the envy if the world. Apart from all the regularly mentioned reasons for not building on Green Belt (stopping urban sprawl, protecting openness and space around development), it also poses a devastating threat on our ecosystems, our biodiversity, our nature and wildlife species at a time when many of our resident and migratory species are in drastic decline nationwide.

GBC has taken perfectly good brown field sites out of the plan (A43 – 2014 Plan) and replaced them with Green Field sites - there is NO rational for this other than being manipulated by developers and the promise of money to enable bigger sites to be accepted.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighboring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch A43, so there is no evidence base to support including this site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
such an extent that the boundaries are unclear and do not follow easily identifiable or permanent borders, site selection 41 is an example. The LP also proposes the over development of villages such as Ockham and East and West Horsley by excessive building on green belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8008  Respondent: 15457953 / Ian Symes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

P2

Green Belt:

I object to the insetting of Effingham, East Horsley, and West Horsley. The NPPF Para 86 states that “If it is necessary to prevent development in a village primarily because of the important contribution it makes to the openness of the Green Belt the village should be included in the Green Belt”. These three villages should all remain washed-over by the green belt as they all make important contributions to the openness and attractiveness of the green belt. In addition, they make an important contribution to maintaining the remaining green belt between Leatherhead and Guildford. These villages play an essential in preventing the erosion of the green belt in this area and should continue to be washed over by the green belt and not inset. I am also concerned that insetting is being used to create green belt areas specially for the purpose of housing development, to meet housing targets. For example, the inset boundary at Site Selections 39, 40 and 41, look artificial, taking inexplicable turns, following unclear boundaries for the specific purpose of artificially creating a development plot. This is completely contrary to NPPF paragraphs 86 and 87.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8014  Respondent: 15458081 / K C Meldrum  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy P2- the policy is unsound as it does not follow the NPPF nor the advice from DCLA Ministers on the preservation of the Green Belt. The Green Belt around Guildford is under attack from all sides. I came to live in Guildford because it has not been spoilt by massive developments and is surrounded by lovely countryside. I have no wish to see the Guildford environs ruined in the way proposed.

What right have we got to rip up the countryside that has been protected for generations? We must protect our countryside for generations to come as once the Green Belt is lost it is lost for ever. We must follow the Government guidance in the NPPF to the letter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. On Green Belt I object to the massive erosion that is proposed simply to meet a challengeable housing target.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I would like to object Strongly to the 2016 draft local plan.

At eight o’clock in the morning the traffic going through Burpham is horrendous as it is without adding to all the extra cars if all these houses were to be built on GREEN BELT LAND and the schools are full in this area. The hospitals cannot manage as it is, so it would be absolutely ridiculous to build on this piece of land.
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<tr>
<th>Comment ID: PSLPP16/8032</th>
<th>Respondent: 15458593 / Jennifer Shute</th>
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<td>I am writing to object to the proposal to build homes within the Green Belt. We were promised repeatedly that this would not happen, except in exceptional circumstances. There are no such circumstances. Our schools and medical facilities are already overstretched.</td>
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<td>I am writing again to object to the plans for houses in the green belt area around the Horsleys. As well as losing the green belt the schools and medical facilities are already overstretched.</td>
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<td>I am Emailing to object to the plan to remove the green belt protection for the village of Chilworth.</td>
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</table>
I wish to object to plans to remove the greenbelt from Chilworth.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8897  Respondent: 15460353 / Elizabeth Hewlett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to not protecting the Green Belt (Policy P2)
I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17721  Respondent: 15460353 / Elizabeth Hewlett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I further object to both villages to be taken out of the Green Belt. The new boundary, (called the in-setting boundary) extends the old settlement boundary and includes some fields and open spaces. This means that Kingston Meadows (by East Horsley Village Hall) is included inside the insetting boundary – despite being a valuable green space. Horsley Tennis & Cricket club at the end of Pennymead Drive is also inside the insetting boundary.

This is totally unacceptable. I object to not protecting the Green Belt (Policy P2)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1879  Respondent: 15460417 / Michael Amor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

This still proposes to inset East Horsley from the Greenbelt. The development of 100 homes is proposed near Horsley station and over 2000 on the Wisley Airfield. The village of East Horsley (and surrounding villages such as West Horsley, Effingham and Ripley) do not have the infrastructure in terms of transport (roads, parking or rail), schools or medical facilities to adequately meet this increased demand.

57% of new housing proposed is on land that is currently categorised as Greenbelt and this is, quite frankly, shameful as this land is land that was supposed to be protected for future generations.
Since Brexit, forecasts of increasing population numbers have been significantly reduced. The ONS forecast is now only forecasting 10.4% for Guildford, which still intends to increase its housing stock by 22%. This doesn't seem to make sense?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17355  Respondent: 15460737 / Donna Collinson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

4.3.13 , 4.3.15 and 4.3.16

Object: See comments on Questions 1 to 3

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8090  Respondent: 15461025 / Philip Masters  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object on the ground that the development would lead to the erosion of the Green belt and any insetting of villages would set a precedent for developers to move in anywhere they choose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8095  Respondent: 15461217 / S. Gilby  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

2. I object to not protecting the Green Belt (Policy P2)

I object to the proposals to remove the villages of Ripley, end and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick's Arch (A43). National Planning Policy requires there needs to be an exceptional circumstance for the Green Belt boundaries to be altered, or for development on Green Belt. There are no exceptional circumstances for these villages. Central government states that housing need is not an exceptional circumstance.

There is a real danger that the loss of this Green Belt will result in urban sprawl and the loss of the individual character of each village, as neighbouring villages merge into one another.

Land once taken from the Green Belt is lost forever.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/586  Respondent: 15461217 / S. Gilby  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object the change to Policy 2 Green Belt because it proposes taking Send Business Park out of Green Belt protection.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15552  Respondent: 15461313 / Anna Price  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing to formally object to the proposed number of houses to be built around Guildford and the surrounding greenbelt and countryside.

This objection is, primarily, based around the adverse effects on rural life and in particular, the health and wellbeing of those who live and work in the area. Such people will, undoubtedly, be impacted, negatively, in terms of the newly placed constraints on their space, privacy, access to amenities and their pace of life.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8103  Respondent: 15461345 / Mark Barrs  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I write to object to GBC’s proposal to remove Green Belt protection from a number of villages in the Guildford area including my village Chilworth.

I find it astounding that it is even being considered. Focus should be on existing brown land areas around the Guildford area that are in need of improvement and are better placed to offer affordable housing and accessibility.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8104  Respondent: 15461409 / Laura Sawyer  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am contacting you to inform you of my objection to the proposed destruction of the greenbelt. Areas are protected for good reason and those reasons are just as important now as they ever have been.

I OBJECT to the removal of 15 villages, including Ripley and Send, from the green belt. This will lead to wholesale, and often inappropriate developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 15461633 / Anna Wood</th>
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<td>I object to not protecting the Green Belt (Policy P2)</td>
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<td>I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)</td>
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<td>There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.</td>
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<td>I Object to the removal of Send Village from the Green Belt. Green Belt status is by definition a permanent status to protect open green spaces from development ensuring they are not eroded and therefore available for future generations to enjoy. It is NOT the Councils job to attack these spaces by downgrading them on a whim. The Council should take pride in protecting them by upholding the permanent Green Belt status. There are NO special circumstances to justify the removal of Green Belt status. Period. There are many brown field development options and existing passed planning applications that have not been utilised. These should all be fully utilised to meet the need for new housing.</td>
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Exceptional circumstances must be demonstrated in order to develop Greenbelt yet despite the weight of public opinion against weakening of this policy, 70% of new housing developments will be in the countryside, of which 58% will be in Greenbelt. By definition, this is not an exception and no attempt is made to demonstrate exceptional circumstances, in line with the requirements of the NPPF. Insetting villages is of concern over issues of character. The Rural Economic Strategy covered in 4.51a, promoting affordable homes everywhere in the countryside including the AONB as a main aim, is a mechanism and is based on data, which is not up-to-date.

Three major strategic sites – Blackwell Farm, Wisley Airfield and Gosden Hill Farm – are in the Green Belt. Previous consultations show that, in line with the NPPF, the public would prefer to use brownfield land in the urban area first.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1468  Respondent: 15461889 / Jasper Collinson-Warr  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Exceptional circumstances must be demonstrated in order to develop Greenbelt yet despite the weight of public opinion against weakening of this policy, 70% of new housing development will be in the countryside, of which, 58% will be in Greenbelt. By definition, this is not an exception and no attempt is made to demonstrate exceptional circumstances, in line with the requirements of the NPPF. Insetting villages is of concern since restrictions within the settlement boundary raises concerns over loss of character. The Rural Economic Strategy covered in 4.51a, promoting affordable homes everywhere in the countryside including the AONB as a main aim, is a mechanism for promoting overdevelopment in our countryside. It has not been subject to full public consultation and is based on data, which is not up-to-date. Three major strategic sites - Blackwell Farm, Wisley Airfield and Gosden Hill Farm- are in the Green Belt. Previous consultations show that, in line with the NPPF, the public would prefer to use brownfield land in the urban area first.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8179  Respondent: 15462017 / Kevin Rhoades  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

2. I object to not protecting the Green Belt (Policy P2)

The removal of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) will result in serious urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8192  Respondent: 15462241 / V.S. Thomas  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to building on the Green Belt. The essential characteristc of Green Belt is its openness and permanence; moreover this Government featured in its manifesto full protection of Green Belt as a core undertaking.

I object to the changes to Green Belt boundaries. This is not justified by any very special circumstances. All Green Belt sites meet the five purposes of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8200  Respondent: 15462241 / V.S. Thomas  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object that housing on the Green Belt will significantly increase traffic (already at saturation point) bringing increased danger, pollution and slower journey times.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8200  Respondent: 15462273 / Frank Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I also take issue with building on the greenbelt and creating an overcrowded, unpleasant town out of the Horsleys - currently fantastic, safe places to live and raise a family.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8212  Respondent: 15462337 / Shirley Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Contrary to advice from Ministers in the Department of Communities and Local Affairs the Local Plan proposes large scale development in Green Belt. Not enough use of Brown Field sites.

Preservation of our Green Belt for future generations should be of primary importance, once lost it will never be recovered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/8249  Respondent: 15462657 / Alex Gordon  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

OBJECTION

I don't want East Horsley or West Horsley to be taken out of the Green Belt. I like the green fields and trees. I don't want the village to be more crowded or have more traffic jams.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8252  Respondent: 15462785 / Thomas McMinn  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

3. I OBJECT

I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’) and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and neighbouring villages merging into each other. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8258  Respondent: 15462881 / Richard and Jackie Good  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We would like to register our objection to the proposed plan to take Chilworth out of Green Belt protection.
We would suggest that without significant improvements in road infrastructure Chilworth cannot cope with the extra traffic resulting from any large scale housing development that would be a consequence of this Local Plan and the removal of protection against development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8266  Respondent: 15462945 / Fiona Puttock  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing to object to the 2016 draft local plan.

We moved from Ockham last year after 22 years of living in this Green Belt area. This is how this area must remain , GREEN BELT!

This area, Ripley, Send and Clandon does not need disproportionate development to ruin its villages. With far too many developments which would result in disastrous consequences.

Please re-think and keep this area as it should be GREEN BELT.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8267  Respondent: 15463713 / Tracey Broadhurst-Jones  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

I object to the removal of the Former Wisley Airfield (FWA/TFM} from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8271  Respondent: 15463777 / Jade Broadhurst-Jones  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Election manifesto promises to the electorate are being ignored
I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>No consideration has been made in the revised proposals for the principle enshrined within the NPPF that exceptional circumstances must be demonstrated in order to develop within the Greenbelt. The proposal to inset the village of East Horsley has not been justified by exceptional circumstances. No account appears to have been made in the revised plan to the overwhelming body of public opinion that objects to the development of the greenbelt and which advocates the development of brownfield sites as priority. I object to the development of new accommodation on the Greenbelt and to the proposal to inset the village of East Horsley and others.</td>
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I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8339  Respondent: 15464577 / Andrew Brown  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8350  Respondent: 15464673 / Trudy Grey  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

3. POLICY P2

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive
development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous
to public consultation. It is disrespectful to argue, as the Council does, that the Plan would involve the loss of
“only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an
“acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be
built on land to be taken out of the Green Belt Paragraph 4.3.16 is seriously deficient in simply stating that the Council
considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional
circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an
exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the
harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears
not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances
required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have
answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing
exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from
the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be
carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt
in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor
is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than
is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land
rather than brown field sites.

I note that the Summer 2016 edition of “About Guildford” (published by the Council) on page 5 states that "... the Plan
rejects any schemes that would have a detrimental impact on the Green Belt.” This is demonstrably untrue and I consider
this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the
consultation period restarted after the correction has been given the same distribution as the original statement. (I
assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that
the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of
these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that
infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is
all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development,
claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines.
The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this
policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost
calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the
Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I
cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could
quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of
opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their
surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an
untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield
(A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires
there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt.
There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special
circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.
There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8396  Respondent: 15465313 / Carole Crichton-Ward  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

5. We are a rural Green Belt area and the government's mandate as stated before they were elected was to protect the Green Belt NOT to decimate it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8397  Respondent: 15466113 / Tim Grey  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- I object to building on the Green Belt because the essential characteristic of Green Belt is its openness and permanence (National Planning Policy Framework paragraph 79);
- I object to the changes to Green Belt This is not justified by any very special circumstances. All the Green Belt sites meet the five purposes of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8400  Respondent: 15466113 / Tim Grey  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- I object to all other strategic sites in the Local Plan, Blackwell Farm, 3 Farms Meadows, Garlick’s Arch, West Horsley and Hog’s All are out of proportion to the surrounding area and none qualify for the exceptional circumstances required to take them out of the Green Belt;
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/8405</th>
<th>Respondent:</th>
<th>15466113 / Tim Grey</th>
<th>Agent:</th>
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3. POLICY P2

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development,
claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
• Impact on room for public space amenities (parks, cemeteries, waste facilities etc)
• Impact on rural business (e.g. mineral mining, film making)
• Impact on natural landmarks and views
• Harm to public health and well being (physical, psychological)
• Allows excessive levels of development in breach of views expressed in last consultation and Conservative Party manifesto commitments at the last local
• Has allowed ruling Councilors to argue that there is an acceptable percentage of Green Belt that should be sacrificed to development, when no such rule exists in the
• Ignores alternative approaches, such as fair burden-sharing under which settlements would undertake to accommodate new development in proportion to their size.
• Disproportionate amount of development (most of it, in fact) to be in Green Too few new homes in urban areas where most people (especially the young and less privileged) want to live. This will act against much needed urbanregeneration.
• "Insetting" of most villages disproportionate and unjustified in terms of their contribution under the NPPF to the purposes of the Green Based on flawed Green Belt and Countryside Study. Idea that most Guildford villages do not contribute to "open ness" is subjective.
• Major settlement extensions allow indiscriminate housebuilding, as irregularly shaped villages are squared off to enclose green
• Overall harm to Guildford Green Belt unjustified by any objective development need post-Brexit.
• Ignores most of NPPF 17 stipulations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the proposed loss of Green Belt. There are no special circumstances for the removal of the Green Belt, particularly in the areas of Send, Ripley and Clandon.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<th>Comment ID: PSLPP16/8454</th>
<th>Respondent: 15466337 / J.R. Lake</th>
<th>Agent:</th>
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<td>I object to the proposal to remove Send, Ripley and Clandon amongst other villages from the Green Belt. Once started the destruction of the Green Belt will not stop. Once gone its gone and GBC will have free reign to convert this green and pleasant land into a high building plot. To my mind this is an act of vandalism by the GBC planners.</td>
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<tr>
<td>1. GREEN BELT</td>
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<td>Others far more articulate and knowledgeable than I have raised their objections to Ripley being removed from the Green Belt. I support and endorse their arguments.</td>
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<td>There is no explanation as to why West Horsley has been chosen to be removed from the Green Belt and no justification for doing so. The local plan states the &quot;we will continue to protect the metropolitan Green Belt&quot; yet the local plan is taking West Horsley out of the Green Belt. West Horsely is a distinctive rural village and its green belt status is essential to ensuring the character of the village remains.</td>
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Comment ID: PSLPP16/8460  Respondent: 15466945 / A M Wagstaff  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to any erosion of the Green Belt. It continues to serve the local community and the country. I believe it is clear that irrevocable decisions taken to meet short term objectives can be disastrous in the long term.

1. I specifically object to removal of the villages in and around Sendmarsh from the Green Belt. This area is already well developed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8475  Respondent: 15468065 / Robert Medhurst  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Our community has been made aware of the forthcoming proposals to remove large areas around Send from green belt. I wish to object to this proposal as this the only protection against indiscriminate building taking place, supported by greedy land owners. I thought there was a promise to protect green belt by the government.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8479  Respondent: 15468097 / Allan Hempstead  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

** I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8487  Respondent: 15468161 / Jane Bell  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
**I object to not protecting the Green Belt (Policy P2)**

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43).

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
1. POLICY P2. Send should not be taken out of the Green Belt. Send provides green space between Woking and Guildford.
   1. Send is a much loved village which actively encourages village
   2. It has strong historic links to the local area including Henry VIII, Sir Francis Drake, one of the oldest
      churches in the country as well as its links to neighbouring historic Ripley.
   3. There is outstanding countryside in Send and its surrounding areas including country lanes and peaceful
      Wey Navigation
   4. It would be a huge loss to erode our much loved village by taking it out of its Green Belt protection.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/8512</th>
<th>Respondent: 15468801 / Lynne Moore</th>
<th>Agent:</th>
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</table>

1. Removal of Green Belt (Policy P2)

There are no exceptional circumstances for the above mentioned sites being removed from the Green Belt, as required
by the National Planning Policy.

   Central Government state clearly that housing need is not an exceptional circumstance.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/8514</th>
<th>Respondent: 15468833 / Zoe Kollov</th>
<th>Agent:</th>
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</table>

I strongly object to Send village being removed from the green belt. I have only moved in less than a year ago to
Send, having moved out of Bellfields in Guildford. The reason my family and I have moved here is precisely for the
reason that it is in the green belt and therefore by law is protected and should remain in its current state and free from
further development. The green belt was intended to be permanent protection by law to ensure we do not hand over an
overdeveloped sprawling mega city to our children, the countryside must remain and there is no special circumstance in
this case why the law should be ignored. Local councillors and central government have given clear election promises
to always protect the green belt, no matter what and this is a complete retraction of the promises and policies that lead to
election.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/8520</th>
<th>Respondent: 15468993 / Nicholas Brown</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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</table>
1. I OBJECT to Send village being removed from the Green Belt. This is my strongest objection. We moved to Send 20 years ago because it was green belt and is in a rural setting between conurbations. The goal posts have been moved to accommodate all the above proposed development. It is a cynical move which must be resisted - the Green Belt was intended to be permanent and was pledged to be protected by local councillors and central government. What has happened to this election commitment? In fill development will be rampant if the area was to lose its green field status.

I trust that these objections will be duly noted by the Planning Inspector and the appropriate action taken.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8524  Respondent: 15469089 / Elaine Myers  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I would like to object to the

Garlick Arch
Wisley
Gosden Hill

plan to remove these area from green belt.

If we give in and except building on green belt land there will be no stopping and no lovely open land would be left.

The increase in traffic on the A3 must also be taken into account.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8532  Respondent: 15469217 / L.Y. Jolliffe  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Where is your mandate for this?

Why have you not written to every resident asking for a Yes or No to these proposals? It will affect all of our lives and we deserve more of a say in it. That is democracy. Expecting residents to 'go on line' for more information about the revised Plan and public events as stated in your 'About Guildford' publication is not good enough. Not everyone has a computer and/or skills - particularly the elderly, who are therefore disadvantaged as a result.
I object to your presumptions that our villages no longer qualify for Green Belt status. This is totally wrong. The government's practice guidelines on protecting Green Belt land, -copy attached- are very clear. Our villages meet the criteria of the five purposes in point 80 as follows;

1. To check the unrestricted sprawl of large built-up areas
2. To prevent neighbouring towns merging into one another eg Woking/Send and/or Send/Burpham
3. To assist in safeguarding the countryside from encroachment
4. To preserve the setting and special character of historic
5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

All of these criteria still apply to our villages and should certainly NOT be set aside.

I object to your definition of housing needs based on spurious projections and calculations of presumed levels of population growth. The recent Brexit vote challenge your predictions as does the public desire for more 'controlled immigration'

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/8539  **Respondent:** 15469217 / L.Y. Jolliffe  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

1. **9. Protecting Green Belt land**

79 The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping Land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

80 Green Belt serves five purposes:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

81 Once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.

82 The general extent of Green Belts across the country is already established.

New Green Belts should only be established in exceptional circumstances, for example when planning for larger scale development such as new settlements or major urban extensions. If proposing a new Green Belt. Local planning authorities should:

- demonstrate why normal planning and development management policies would not be adequate;
- set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary;

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick's Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a 'special circumstance' and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC's Green Belt & Countryside Report does not address Garlick's Arch, so there is no evidence base to support including this site.

Rather than developing Garlick's Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

From an internet search I have found that by definition the main purpose of the green belt policy is to protect the land around larger urban centres from urban sprawl by keeping land permanently open and maintain the designated area for forestry and agriculture as well as to provide habitat to wildlife. The essential characteristics of Green Belts are their openness and their permanence. How can it be ok or acceptable for Guildford council to dismiss this essential policy!!!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8570  Respondent: 15471489 / P Gilby  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to not protecting the Green Belt

I object to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garrick's Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or for development on Green Belt. There are no exceptional circumstances for these villages. Central government states that housing need is not an exceptional circumstance. There is a real danger that the loss of this Green Belt will result in urban sprawl and the loss of the individual character of each village, as neighbouring villages merge into one another. Land once taken from the Green Belt is lost forever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8596  Respondent: 15472097 / Bernard Eyre  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garrick's Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt.

There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick's Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.
<table>
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<tr>
<td>I object to Send village being removed from the Green Belt – it is essential that Send maintains its permanent Green Belt status to ensure the continued separation of Woking and Guildford.</td>
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<tr>
<td>I object to the proposal to remove Send from the Green Belt. To avoid one long conurbation, Send Needs to be a buffer between Guildford and Woking.</td>
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<td>Also send should not be removed from the greenbelt.</td>
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<th>Comment ID: PSLPP16/8645</th>
<th><strong>Respondent:</strong> 15474785 / Jules Widdowson</th>
<th><strong>Agent:</strong></th>
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<td><strong>Document:</strong></td>
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The proposal to remove the Horsleys from the Green Belt. These villages should not be withdrawn from the Green Belt. They are village communities and to remove them from the Green Belt will make it easier to build new homes without regard to the sustainability of the village community and the limitations of its infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8659  Respondent: 15474849 / Timothy Yorath  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council's to give away and once it is gone it is gone forever.

Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of "only" 1.6% of the borough's Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an "acceptable" percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council's growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers' hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth.
which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the "insetting" of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the "openness" of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPFs other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To "inset" two-thirds of the borough's rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough's location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed "insetting" and boundary extensions go ahead. This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17's aim of "empowering local people to shape their surroundings" and other NPPF provisions. Paragraph 4.3.17 states that "the general extent of the Green Belt has been retained." I believe this should be deleted as an untruth. In addition I OBJECT to the proposals to remove from the Green Belt the so called 'strategic sites' of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick's Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a 'special circumstance') to be taken from the Green Belt. Once taken from the green belt they will be lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC's Green Belt & Countryside Report does not address Garlick's Arch, so there is no evidence base to support including this site. Rather than developing Garlick's Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
There are also a number of further issues relating to the detailed implementation of this policy which are set out further below:

a) Paragraph 4.3.13: Proposal to inset East Horsley from the Green Belt

Policy P2 proposes that East Horsley should be inset from the Green Belt, instead of being ‘washed over’ as it is today. Currently development is permitted within the settlement boundary, although this area is still considered to be Green Belt with a particular planning regime being applicable.

East Horsley is set in a rural location and the village has the look and feel of a rural village. Its Green Belt status has been a key factor in preserving that character. Moreover, being ‘washed over’ by the Green Belt has not been a serious constraint on development within the village. For example, GBC’s planning records indicate that no less than 149 net new homes were added to the village housing stock through in-filling and brownfield developments between 2000 and 2015.

GBC attributes the need to inset East Horsley to NPPF requirements, arguing that the test for remaining ‘washed over’ is that the village should make an important contribution to the openness of the Green Belt. This East Horsley clearly does. No less than 36% of East Horsley is composed of woodlands, whilst inside the settlement area there is an average housing density of just 8.1 dwellings per hectare (‘dph’). Woodlands and large residential gardens make a vital contribution towards bio-diversity, provide wildlife corridors, and furnish those open spaces which are vital to the character of the greenbelt. It is one thing for a planner to study a map and see a settlement area filled with housing, but it is quite another actually to come to a rural village like East Horsley and see how the Green Belt has preserved the rural character and openness of this village.

Today East Horsley is a picturesque and flourishing rural community, which has and continues to experience steady incremental growth as a result of being ‘washed over’ by the Green Belt.

I therefore object to the proposal to inset East Horsley from the Green Belt and requests that this proposal be dropped from the Local Plan.

b) Paragraph 4.3.16 and Proposals Map: Settlement Boundary changes in East Horsley

GBC are proposing to make a number of changes to the settlement boundaries of East Horsley and so expand the settlement area, as set out in the Proposals Map, with the justifications seemingly provided in the Green Belt & Countryside Study prepared by the consultants, Pegasus.

I object to two specific boundary changes, which have been proposed, as follows:

1. There is a proposal to move the East Horsley settlement boundary westwards from behind the houses on the west side of Ockham Road North up to the eastern boundary of Lollesworth. This proposal removes over 5 hectares of agricultural fields from the Green Belt. The present boundary line is clearly defined by a deep and well-maintained drainage ditch which is classified by the Environment Agency as a ‘main river line’ and therefore represents a highly defensible Green Belt boundary.

Moving this boundary west to the edge of woodland in no way improves its defensibility. Under NPPF rules Green Belt boundaries should only be changed in ‘exceptional circumstances’. We do not believe this proposal can be considered as an exceptional circumstance. Clearly the only justification for this change is to bring a large agricultural field within the settlement area in order to provide more housing land. However, under NPPF rules this is not a sufficient justification for changing a Green Belt boundary. As such, we believe it is an invalid proposal.

I object to this proposed boundary change.

1. There is also a proposal to move the East Horsley settlement boundary westwards from behind the houses on the west side of Kingston Avenue up to a tree line running along the Parish Boundary at the western edge of Kingston Meadows. The result is to take all of Kingston Meadows out of the Green

Kingston Meadows is the main public recreational space of East Horsley, comprising various sports facilities and playing fields. The present settlement boundary is clearly defined by a deep and well-maintained drainage ditch running along its
eastern side. It therefore represents a very defensible Green Belt boundary. Moving this boundary westwards to the edge of woodland in no way improves its defensibility. Under NPPF rules Green Belt boundaries should only be changed in ‘exceptional circumstances’. We do not believe that this can be considered as an exceptional circumstance. As such we believe this is an invalid proposal.

I object to this proposed boundary change.

In the Green Belt & Countryside Study and its accompanying Topic Paper, GBC justifies the need to make changes in settlement boundaries in order to meet unfulfilled housing need in the Borough. However, Green Belt rules make it clear that unfulfilled housing need is not normally considered to be ‘an exceptional circumstance’. If it were the entire Green Belt would already be covered in tarmac.

The NPPF is clear that every movement in settlement boundaries must be justified by ‘exceptional circumstances’. GBC have offered only a generic justification in their Topic Paper of meeting unfulfilled housing need, but a case by case justification has not been provided. As such, we believe

the settlement boundary changes referred to above (and many others) are invalid without such detailed justification.

c) Paragraph 4.3.17: Proposal to remove Wisley Airfield from the Green Belt

I object to the proposal to remove Wisley Airfield from the Green Belt. The only justification for this proposed change is unfulfilled housing need which is not considered an exceptional circumstance. The proposed Wisley development is discussed further below in the Site Allocation section.

d) POLICY P2: Limited In-filling

A new planning designation has been introduced called ‘the identified boundary of the village’. For East Horsley this covers a number of roads south of the A246. It is a sizeable area, covering 45 hectares, the equivalent of 23% of the present Settlement Area of the village. Within this area, Policy P2 sets out proposals that would allow ‘limited in-filling’ within this boundary.

We find it hard to reconcile the opening statement of Policy P2 that “We will continue to protect the Metropolitan Green Belt” with this sizeable reduction in effective Green Belt status. In our opinion, this policy represents a de facto extension of the Settlement Boundary and a substantial reduction in the operational effectiveness of the Green Belt, whose effectiveness is significantly weakened where this new planning designation applies.

I object to the proposal to designate roads south of the A246 as being within the ‘identified boundary of the village’ and to allow limited infilling within this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/8726</th>
<th>Respondent: 15475297 / Jane Patricia Chandler</th>
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<td>I OBJECT to not protecting the Green Belt (Policy P2)</td>
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I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8752  Respondent: 15475649 / Joanne Smith  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8752  Respondent: 15475649 / Joanne Smith  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

As a resident of West Horsley and parent to two small children, I STRONGLY OBJECT to East and West Horsley being removed from the Green Belt as proposed in the Guildford Borough Council Proposed Local Plan. We moved to the village to provide a safe village life experience for our children and for them to attend a small community school. The developments proposed would impact adversely on the village, with increased demand on resources and infrastructure that is already under pressure, while damaging the character of the village and its surrounds.

Specifically I OBJECT to Policy P2: Green Belt and the Countryside / Policy P1: Surrey Hills Area of Outstanding Natural Beauty (AONB)for the following reasons:

- The impact on green belt development on local agriculture, rural leisure nd tourism, food control, air pollution, natural heritage, water catchment, room for public space amenities and harm t public health and wellbeing have all been ignored.
The first line of Policy P2 states, “We will continue to protect the Metropolitan Green Belt against inappropriate development.” This seems incongruous based on the amount of development proposed. I, along with the residents of West Horsley are totally opposed to the village’s removal from the Green Belt by insetting and extending the 2003 Local Plan Settlement Area boundaries. There is no evidence that any exceptional circumstance exists to warrant this development and certainly no valid justification provided for the new Green Belt boundaries. There are numerous historic buildings in West Horsley as well as low housing density settlements, all positioned partly in the Surrey Hills AONB and this should be maintained.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8773  Respondent: 15476289 / Gregory Heffer  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

In terms of the Sites, I OBJECT to all policies involving building in the Green Belt. No "exceptional circumstances" have been shown and the views of previous residents clearly expressing their views have been ignored. In addition the number of sites is completely excessive.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8779  Respondent: 15476289 / Gregory Heffer  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to not protecting the Green Belt (Policy P2)

Our Green Belt is precious. It is what protects London from urban sprawl; it preserves air quality; it prevents flooding; it is the city’s playground. It is for us to conserve and protect it. There are 5 legal purposes for Green Belt, and it meets them all:

• To check the unrestricted sprawl of large built up areas
• To prevent neighbouring towns merging into one another
• To assist in safeguarding the countryside from encroachment
• To preserve the setting and special character of historic towns
• To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

This policy is flawed and should have been amended. In the last consultation just six individuals, out of the c.7,000 of those who took part in the consultation, supported the policy. Another 20 comments of support were from organisations such as: the University of Surrey, local councils (including Guildford), consultants (e.g. Savills) or landowners. But of the 1,371 who commented on the green belt policy 1,332 (97%) were against.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>NO EXCEPTIONAL CIRCUMSTANCES</td>
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<td>The local plan proposes nearly 9000 new homes to be built on Green Belt land (compared with ~ 50 000 current homes in Guildford, so approx. equal to 18% of the existing homes in the borough) – a huge proportion. The National Planning Policy Framework (NPPF) requires any change of Green Belt boundaries to demonstrate exceptional circumstances. Unmet housing need is NOT an exceptional circumstance in law. No exceptional circumstances have been disclosed. So the Green Belt boundaries should NOT be changed through the plan making process</td>
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<td>BROWNFIELD AVAILABLE</td>
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<td>There is brownfield land available in the town centre which is being earmarked for commercial development rather than for housing. This is enough to meet our real needs for affordable local homes. There are enough vacant commercial sites to cope with genuine business need, and we have enough retail capacity already, so urban brownfield/derelict land should be used for housing.</td>
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**Comment ID:** PSLPP16/8792  **Respondent:** 15476641 / Tessa Hart  **Agent:**

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**Comment ID:** PSLPP16/8793  **Respondent:** 15476641 / Tessa Hart  **Agent:**

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<td>Comment ID: PSLPP16/8794</td>
<td>Respondent: 15476673 / Josh Hart</td>
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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<th>Comment ID: PSLPP16/8797</th>
<th>Respondent: 15476737 / R G Parker</th>
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I am very much aware of the value of the Green Belt status, in that it assists local authorities to minimise ribbon and other undesirable developments. I am horrified and shocked that Guildford Borough Council seem to have abdicated their responsibilities for the controlled development of Send and nearby villages.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<th>Comment ID: PSLPP16/8798</th>
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I therefore object to Garlick's Arch (policy A43), Slip roads to the A3 at Burnt Common (Policy A43A) and Gosden Hill Farm, Merrow (policy A25) all breaching the government's commitment for Green Belt Protection. I would like the Planning Inspector to be aware of my objections and the reason for them.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/8800</th>
<th>Respondent: 15476801 / Raymond and Monica Harmes</th>
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Keep East and West Horsley in the Green Belt - any other solution is totally lacking in foresight.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8803  Respondent: 15476833 / Peter Hart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The new village boundaries have been extended into the green belt to include farm fields and open spaces. For example, the Tennis Club and Kingston Meadows, a green space widely used by local residents adjacent to East Horsley Village Hall, are now included inside the insetting boundary. Insetting makes it easy for the Council to impose additional new builds with almost complete disregard for local challenges. This is an example of the creeping appropriation of the green belt by local authorities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8818  Respondent: 15477569 / Paul Cheeseman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to a plan which proposes that over 70% of new housing be built within the Green Belt - that is not what Green Belt is for.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8867  Respondent: 15477665 / S.J. Wilkins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I strongly object to the 2016 Guildford Draft Local Plan on the following grounds in this plan.

1. Loss of Green Belt Land between Burpham and M25.

There is a disproportionate level of development to the north of Guildford.

The proposed developments of Garlicks Arch, Send, Wisley and Gosden Hill Farm will be developments that will infill the Green Belt from the Northern Edge of, Burpham up to the M2S at Wisley.
The plan does not offer sufficient evidence of exceptional circumstances to justify allocating Green Belt land for strategic development and more consideration should be given to Brownfield development.

Consequently, I object to the loss of the Green Belt, especially the Gosden Hill Farm development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8881  Respondent: 15477729 / Julia Hoar  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Guildford Borough Council trying to force through planning and building huge amounts of houses all over the green belt.

ELNA 2015 shows an 80% reduction in employment space needed from their 2013 survey – why are you ignoring this? I object.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8916  Respondent: 15478017 / Kirstie Pankhurst  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY P2 (GREEN BELT):
• No declaration of support for protecting the Guildford Green Belt, contrary to NPPF and government statements.
• No evaluation of value of local Green Belt as a public and private asset: it’s just treated as potential building land with a few inconvenient restrictions.
• Impact of Green Belt development on local agriculture ignored.
• Impact on rural leisure and tourism ignored.
• Impact on flood control ignored.
• Impact on carbon sink and knock-on effects for air pollution and climate change ignored.
• Impact on biodiversity ignored.
• Impact on natural heritage ignored.
• Impact on water catchment ignored.
• Impact on room for public space amenities (parks, cemeteries, waste facilities etc) ignored.
• Impact on rural business (e.g. mineral mining, film making) ignored.
• Impact on natural landmarks and views ignored.
• Harm to public health and wellbeing (physical, psychological) ignored.
• Allows excessive levels of development in breach of views expressed in last consultation and Conservative Party manifesto commitments at the last local elections.
• Has allowed ruling Councillors to argue that there is an acceptable percentage of Green Belt that should be sacrificed to development, when no such rule exists in...
the NPPF.
• Ignores alternative approaches, such as fair burden-sharing under which
  settlements would undertake to accommodate new development in proportion to
  their size.
• Disproportionate amount of development (most of it, in fact) to be in Green Belt.
  Too few new homes in urban areas where most people (especially the young and
  less privileged) want to live. This will act against much needed urban
  regeneration.
• “Insetting” of most villages disproportionate and unjustified in terms of their
  contribution under the NPPF to the purposes of the Green Belt. Based on
  flawed Green Belt and Countryside Study. Idea that most Guildford villages do
  not contribute to “openness” is subjective.
• Major settlement extensions allow indiscriminate housebuilding, as irregularly
  shaped villages are squared off to enclose green fields.
• Overall harm to Guildford Green Belt unjustified by any objective development
  need post-Brexit.
• Ignores most of NPPF 17 stipulations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of “About Guildford” (published by the Council) on page 5 states that “... the Plan rejects any schemes that would have a detrimental impact on the Green Belt.” This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.
GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/15892  **Respondent:** 15478209 / Sally Daboo  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage.

The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.
I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9076  Respondent: 15478753 / Evette Rochester  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I'm registering my objection to removing the villages of Chilworth, Shalford and Peasmarsh from the Green Belt.

I'm a Chilworth resident. My name is Mrs and my address is [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998]

I object on the basis of perceived lack of infrastructure in the area, damage development will do to the local environment, we're in an area of outstanding natural beauty and next to a heritage site, and it contravenes why we chose to live here - a small local village and community which isn't built-up/vastly populated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/9077  Respondent: 15478785 / Alicia Grainger  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Perhaps most importantly, the statement included in the plan “We will continue to protect the Metropolitan Green Belt” goes against everything that the Plan proposes to do in East and West Horsley, with 65% of the new houses being built on Green Belt land. Protection of the Green Belt land has to be one of the most important issues for villages like West and East Horsley and the impact on flooding control, tourism and leisure, rural businesses, natural heritage and biodiversity have not been considered. There is a disproportionate amount of development to be in the Green Belt, with too few homes in urban areas where most people (especially the young and less privileged) want to live.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Comment ID: PSLPP16/9115  Respondent: 15479201 / Nick Norton  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Policy P2 Green Belt
This policy states, “the general extent of the Green Belt has been retained.” I do not accept this statement. The Metropolitan Green Belt forms 89% of the borough and should be the cornerstone of all local planning policy. As noted under Policy S1, it is a solemn legacy to future generations – an asset and amenity that belongs as much to Londoners and the whole nation as to the people who live in it. It is an inalienable public good. Once gone it is gone forever. It is not the Council’s to give away.

Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. Building on it involves high opportunity costs, including an irreversible loss of:
1. Agricultural production
2. Rural leisure and tourism amenities
3. Water catchment
4. Flood control
5. Biodiversity
6. Natural heritage
7. A carbon sink for air pollution
8. Room for public facilities such as parks and burial grounds
9. Profitable film locations (e.g. Shere)
10. Future economic potential such as mineral extraction (even fracking)
11. Natural beauty, landmarks, open space, rural views and sight lines
12. Benefits to public health and wellbeing, physical and psychological (as well expressed in the NPPF)

As a matter of law and national and local policy, these assets should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas.
It is quite incorrect to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and
settlement boundary extensions are included. I object to the “insetting” of 14 villages from the Green Belt, and at “infilling” 12 of the borough’s Green Belt villages. I am worried that settlement boundaries are to be greatly extended in many villages and that infilling is also proposed outside the settlement boundaries of 11 further villages. Effectively, this policy makes all villages within the Green Belt vulnerable to large scale development.

This policy is disproportionate in terms of foreseeable development need. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/9154  **Respondent:** 15479553 / Percy Warner  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

I wish to add my objection to the proposed plan for the removal of Chilworth and other adjoining villages from the protection of the Green belt.

This is an A.O.N.B. and should remain so. I and many other local people have chosen to live here because of the quietness and unspoil countryside which offers a great amount of peaceful walks. If Chilworth and other villages are removed from protection then this would result in more houses, people, cars, further congestion, fewer school places for children and pollution on our already over crowded ratrun roads. As the country has now voted for Brexit then hopefully not so many further homes need to be built so that we in the villages of the, Surrey Hills can still enjoy the peace and tranquility of this beautiful area which is the reason we moved here in the first place.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/13038  **Respondent:** 15479553 / Percy Warner  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

I am writing to you as I have grave concern that you are considering taking Chilworth out of the Green Belt, along with Shalford, Peasmarsh and many other villages. These villages were given Green Belt status, so they couldn't be subject to development. If you remove this, all our lovely green fields and peace and quiet would be removed and this is criminal.

We don't need houses built everywhere, whatever we are told. Even more so now with coming out of the EU, we certainly will not need the houses. Nobody has the right to live in the village they are born in, as years ago I had to move away and return years later when I could afford it and I found the new home I was happy to live in.

So I am asking you from the bottom of my heart to please reconsider this proposal to take Chilworth & the local villages out of the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
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<th>Comment ID: PSLPP16/9525</th>
<th><strong>Respondent:</strong> 15479681 / George Smith</th>
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<td>I object to the removal of villages from the Green Belt.</td>
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<td>I OBJECT to all insetting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley</td>
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<td>I OBJECT to The Talbot Ripley as this is over development in an open space within the Green Belt.</td>
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<td>I object removing Send Business Park from the Green Belt (4.3.15).</td>
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<td>Send Business park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for it’s insetting (removal) from the Green Belt, and indeed GBC have not even attempted one. Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.</td>
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<td>I object to policy P2 green belt. I want to keep the green belt because we will have more oxygen and space to walk our dogs. I don't want the animals to have not very much space to find their food and drink.</td>
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Attached documents:

Comment ID: PSLPP16/9556  Respondent: 15480225 / Andrew Vovterhalter  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Attached documents:

Comment ID: PSLPP16/9557  Respondent: 15480289 / Jemima Vovterhalter  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Attached documents:

Comment ID: PSLPP16/9558  Respondent: 15480417 / J Chequer  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Attached documents:

Comment ID: PSLPP16/9559  Respondent: 15480449 / A D R Lewis  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the removal of villages from the Green Belt.
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<tr>
<th>Comment ID: PSLPP16/9562</th>
<th>Respondent: 15480609 / R E Jones</th>
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<th>Respondent: 15480641 / Gillian Battams</th>
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</table>
1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Green Belt is not for the Council to give away; it belongs to us all and not just those who live within it, yet the detail of the policy suggests the Council is willing to sacrifice it. There is no commitment within this plan to protect the Green Belt, contrary to the content of the NPPF, party manifesto commitments, government policy and previous responses to public consultations.</td>
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<td>• Water catchment</td>
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**Comment ID: PSLPP16/9569  Respondent: 15481089 / Ann Stone  Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID: PSLPP16/9572  Respondent: 15481185 / Ray Avery  Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID: PSLPP16/9573  Respondent: 15481217 / C R Avery  Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID: PSLPP16/9223  Respondent: 15481281 / Simon Tolchard  Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Green Belt is not for the Council to give away; it belongs to us all and not just those who live within it, yet the detail of the policy suggests the Council is willing to sacrifice it. There is no commitment within this plan to protect the Green Belt, contrary to the content of the NPPF, party manifesto commitments, government policy and previous responses to public consultations.

There is no assessment of the Green Belt’s value, yet losing it results in an irreversible loss of:

- Agricultural production
- Rural leisure and tourism amenities
- Water catchment
• Flood control
• Biodiversity
• Natural heritage
• A carbon sink for air pollution
• Room for public facilities such as parks and burial grounds
• Profitable film locations (e.g. Shere)
• Future economic potential such as mineral extraction (fracking)
• Natural beauty, landmarks, open space, rural views and sight lines
• Benefits to public health and wellbeing, physical and psychological (as well expressed in the NPPF).

The draft Local Plan suggests that most Guildford villages do not contribute to “openness”, however this is subjective. Indeed, preserving the openness of Effingham is a cornerstone of their emerging Neighbourhood Plan and fits with Paragraph 17 of the NPPF which “empowers local people to shape their surroundings”. I am especially concerned by the proposed ‘insetting’ of 14 villages from the Green Belt, and ‘infilling’ 12 of the borough’s Green Belt villages. It is of great concern that settlement boundaries are proposed to be extended in many villages and that infilling is also proposed outside the settlement boundaries of 11 further villages. To ‘inset’ two thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is completely inappropriate, given the stated objectives of the Green Belt in the NPPF and government policy. No exceptional circumstances have been disclosed, and therefore the Green Belt boundaries should NOT be changed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9268  Respondent: 15481409 / Amy F Corstin  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt.
in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of “About Guildford” (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines.

The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the ‘insetting’ of local villages and to the horrific overloading of the A3 proposed by the developments in this plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9481  Respondent:  15482785 / Rigas Petri  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I would like to register my objection for the Guildford plan 2016 which will remove Green belt status of our beautiful village Chilworth

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9484  Respondent:  15482817 / C.E. Pullen  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick's Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a 'special circumstance' and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC's Green Belt & Countryside Report does not address Garlick's Arch, so there is no evidence base to support including this site.

Rather than developing Garlick's Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9496  Respondent:  15482977 / Craig Robertson  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
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<td>I OBJECT. This policy is much weaker than previous protection. It is dependent on the Surrey Hills Management Plan, which welcomes housing development. The Surrey Hills needs much more substantial protection. I particularly protest at the “insetting” of 14 villages from the Green Belt, and at “infilling” 12 Green Belt villages. I am deeply disturbed that settlement boundaries are to be hugely extended in many villages and that infilling is also proposed outside the settlement boundaries of 11 further villages. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development.</td>
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<td>I OBJECT to not protecting the Green Belt (Policy P2) I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td>Attached documents:</td>
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<table>
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<th>1. Introduction</th>
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<tr>
<td>1.1. We act on behalf of the Guildford College Group in relation to their Merrist Wood College campus. Merrist Wood is a landbased college, which trains skilled workers for agricultural and horticultural industries. 1.2. The Merrist Wood campus is a long established college and the only land based college in Surrey. It extends over 400 acres, with a wide range of built facilities covering over 12.7ha including teaching blocks, student accommodation, glasshouses, workshops, sports pavilions, and one of the largest indoor equine arenas in the south east. The College is broadly split between the northern and southern campuses.</td>
</tr>
</tbody>
</table>

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1.3. Merrist Wood College (MWC) is a 162ha, multi-award winning College which specialises in the land-based industries. The College is widely recognised by industry specialists for its training and for its past successes at RHS Chelsea and more recently at the Hampton Court Flower Shows; with work from the estate known across the country and in other parts of the world. The College has a national and international reputation amongst employers and industry specialists and a long history of providing education in the land-based sectors. In the College’s last Ofsted inspection they were graded as having “outstanding provision in land-based, equine and animal care”. Inspectors commented that there is “very good academic and pastoral support” and “curriculum enrichment, including work experience, visits and external speakers, is strong”.

1.4. The existing educational facilities at MWC include a large, diverse animal management centre which has both domestic and exotic animals; specially designed studios and workshops for floristry (horticulture), garden design and landscaping (with ancillary retail); workshops and classrooms for maintenance of agricultural machinery and equipment (vehicle technology); equine care and livery (currently with accommodation for over 70 horses); an indoor riding arena which is one of the largest of any college in the country; student classrooms, computer technology suites, a student library and associated ancillary student facilities including a restaurant, etc.; a working farm; and, on-site student and staff residential accommodation. The College also provide outdoor sport activities for its students and the wider community, which includes an existing affiliation with Chelsea Football Club wherein one of their ‘soccer academies’ is run from the land at MWC.

1.5 The College are developing ambitious plans for the future. Having recently invested £1m at their Farnham Sixth Form College site in the last three years they are now looking to further heavily invest in the redevelopment and enhancement of the Merrist Wood Campus in the coming years.

1.6. There is a continuing need to rationalise, modernise and grow the college campus to cater for an expanding educational offer and the anticipated growth. The College has suffered from under-investment for a number of years. With a renewed emphasis on modernising the educational offer at Merrist, the College are currently exploring development plans with the council through the pre-application process to expand and modernise the campus. These current development plans will ensure that the college is allowed to maintain and improve its facilities and realise capital funds, to secure its long term future. This evolution and growth of the campus will continue into the future.

1.7. It is therefore important that the emerging Guildford Borough Local Plan allows for the continual evolution and current growth plans for Merrist Wood. Our contention is that the Merrist Wood campus should be inset from the Green Belt as has been proposed for other major developed sites in the Green Belt. The Merrist Wood campus is larger, with more built development than many of the other major developed sites that have been proposed to be inset from the Green Belt. The campus is well contained in the landscape with opportunities on its own land to strengthen defensible boundaries.

2. Policy Background

2.1. The status of Merrist Wood as a major developed site in the Green Belt has been recognised is successive versions of the Local Plan.

2.2. More recently, draft Policy 9 ‘Villages and major previously developed sites’ of the Draft Local Plan (Regulation 18 – July 2014) gave recognition to previously developed sites in the Metropolitan Green Belt. It stated that development should help support the present and future economic, environmental and social sustainability of rural settlements in the Borough.

2.3. Two levels of major previously developed sites were referenced. Firstly, sites including Mount Browne Headquarters and the Pirbright Institute where “appropriate development and redevelopment opportunities will be supported”. Secondly, other major previously developed sites, including Merrist Wood College, Bisley Camp and RHS Wisley were identified as suitable for “small scale or infill development and redevelopment”.

2.4. The provisions of Draft Local Plan Policy 9 have, however, not been carried through to the Submission version of the Local Plan (July 2016). Instead, there is a new draft Policy 2. Draft Policy 2 gives no recognition to previously developed sites in the green belt such as the Merrist Wood campus, and fails to support the present and future sustainability of rural settlements.
2.5. Although not explained as the reason for removing draft Local Policy 9, we understand that as the NPPF now gives greater support for the limited infilling or the partial or complete redevelopment of previously developed sites, there is perhaps no need to recognise major previously developed sites in the Green Belt in the Local Plan to allow for their expansion.

2.6. Supporting text to draft Policy 2 states that “if major previously developed sites are of sufficient scale and do not possess an open character, it is not considered necessary for them to remain within the Green Belt”. Seemingly using these criteria, the Submission Local Plan proposes to remove some major developed sites from the Green Belt, including Henley Business Park, HM Prison Send, Keogh Barracks, Mount Browne, Pirbright Barracks, Pirbright Institute and the University of Law Guildford. Further, it is proposed that these sites are then allocated for development, including housing, or designated as Strategic Employment Sites.

2.7. Supporting text states that the Council considers that “exceptional circumstances exist to justify the amendment of Green Belt boundaries in order to facilitate the development that is needed and promote sustainable patterns of development” (para. 4.3.16).

2.8. We have reviewed the Guildford Borough Green Belt and Countryside Study, prepared on behalf of the Council by Pegasus Group, to understand the evidence base upon which the Council is relying for green belt matters. This study reviewed all of the previously developed sites within the green belt, to determine whether there are opportunities for appropriate expansion or redevelopment of those sites. Sites were determined to either be inappropriate or appropriate for insetting within the green belt as follows:

<See table attached>

2.9. It appears that four broad criteria were used to make the allocations in the above table. These were the proportion of built development/openness; the total site area; land uses and character; and the presence or otherwise of defensible boundaries. Pegasus Group’s findings can be summarised as follows:

<See table attached>

2.10. Pegasus Group conclude that sites 1-7 should be inset from the green belt and that sites 8-11 should continue to be ‘washed over’ by the green belt.

3. Draft Policy 2

The case for insetting Merrist Wood from the Green Belt

3.1. The college’s contention is that if these criteria are applied properly and consistently then Merrist Wood College should also be inset from the Green Belt.

3.2. Local and national planning policy requires that land which it is unnecessary to keep permanently open, should not be included in the green belt.

3.3. We do not accept the findings of the Green Belt and Countryside Study that concludes that it would be inappropriate to inset Merrist Wood College from the Green Belt. We believe the specified criteria have not been applied consistently and if they had, Merrist Wood would have been proposed to be inset from the Green Belt and treated similarly to other undesignated sites.

% Built Development

3.4. Of the 11 sites examined, seven were identified as being appropriate for insetting in the Green Belt. Merrist Wood has the second highest proportion of built development on site, more than five of the other sites that are proposed to be inset from the Green Belt. This is significant and conveys that the educational campus is packed tightly with development, with minimal areas of open land, particularly when compared with other developed sites in the Green Belt. The council’s study concludes that 6.4ha of built development exists on site. This is five times as much development as exists on the University of Law site.

Total Site Area
3.5. Again, when compared with the seven sites proposed for removal from the Green Belt, only two sites are larger than Merrist Wood in overall area. At 12.7ha in size, Merrist Wood is twice as large as Mount Browne Police HQ, and three times the size as the University of Guildford site. Both these sites have been proposed to be inset from the Green Belt.

3.6. It has been consistently acknowledged by the council that Merrist Wood College is a major previously developed site in the Green Belt and that policy has continued to support the expansion of the college campus.

**Uses and Character**

3.7. The council’s study states that the campus includes ‘agricultural buildings sparsely arranged within open grounds. Areas of open land contribute to the openness of the wider Green Belt’.

3.8. We strongly disagree with this description. College’s land ownership covers an area of over 400 acres. However, the main educational facilities comprise of two distinct areas, the northern and southern campuses. The northern campus comprises teaching blocks, canteen and meeting space, student accommodation, sports pavilions, glasshouses, and workshops. There are large areas of car parking and other hard surfacing. The northern campus is situated on a ridge and contained by trees and ancient woodland on all aspects.

3.9. The southern campus accommodates one of the largest indoor equine arenas in the south east, with sprawling areas of hardsurfacing, storage sheds and machinery warehouses. The site is contained to the south by woodland and Holly Lane, a main route into Worplesdon.

3.10. The site is not sparsely arranged within open grounds and the land within the northern or southern campuses does not contribute to the openness of the wider Green Belt. Merrist Wood has the second highest proportion of built development on site, more than five of the other sites that are proposed to be inset from the Green Belt. This is significant and conveys that the educational campus is packed tightly with development, implying minimal areas of open land.

3.11. It is important to note that the boundary proposed for the site when it was designated as a ‘Major Developed Site (MDS) in the Green Belt’ under draft Policy 9 ‘Villages and major previously developed sites’ of the Draft Local Plan (Regulation 18 – July 2014) only included that land covered by the northern and southern campuses. The built facilities of the College are split in two by open fields used as pasture and for sports but this land was never included within the MDS boundary.

**Defensible boundaries**

3.12. The main criticism of the site by the council is that the defensible boundaries of the site are incomplete or absent. Again, we strongly disagree with this conclusion.

3.13. As mentioned above, the northern campus is situated on a ridge and contained by trees and ancient woodland on all aspects. This means that substantial built development on this part of the campus is screened from wider views and therefore contributes little to openness of the Green Belt.

<See picture attached>

3.14. The southern site too benefits from defensible boundaries including the existing trees, hedges, and roads to the south. These combine to create a clear demarcation of the site’s developed areas on the landscape.

<See picture attached>

3.15. In any event, the site’s defensible boundaries could easily be strengthened through a landscaping scheme; either implemented as immediate plans or as part of redevelopment works for the campus, which are in the process of being prepared and have been discussed with the Council through the pre-application process. The college has sufficient land ownership around the site to allow boundary strengthening works to proceed easily.

<See picture attached>
3.16. Even if Merrist Wood Campus is inset from the Green Belt, we would only expect the built facilities of the College to be inset. This would be consistent with the approach taken to the previously proposed MDS boundary. Furthermore, a variety of other development management policies would ensure that any development inappropriate for the site is avoided.

4. Development aspirations

4.1. Insetting the Merrist Wood College campus from the Green Belt would also assist the College in realising their development aspirations to modernise and grow the College.

4.2. The Merrist Wood College campus is in need of urgent investment and renewal. It operates from facilities which are no longer fit for purpose by modern teaching standards and it is suffering from a prolonged period of under-investment.

4.3. The outdated accommodation is expensive to maintain. The campus desperately needs to re-invest in order to improve its educational offer and become financially viable and self-sustaining. Without such investment, there is a very real danger that prospective students will venture elsewhere to colleges with considerably better facilities. Although the college is well regarded locally, it is falling behind the top performing land based colleges at a crucial time when the higher and further education sector is in a state of flux.

4.4. The college wishes to improve its education offer through a series of enhancements to the campus and its facilities. These aspirations have been shared with the Council through their pre-application process and we expect to submit a planning application for these improvements shortly.

5. Proposed amendments

5.1. Our client is concerned that the Submission Local Plan is unsound for the following reasons:

5.2. 1. The plan fails to present the most appropriate strategy for the Borough’s previously developed sites within the green belt, based on the Council’s own evidence, and is therefore not justified.

5.3. 2. Through failing to channel appropriate development to the Borough’s previously developed sites in the green belt on a consistent basis, the plan does not provide for the most sustainable pattern of development over the plan period and is therefore inconsistent with national policy.

5.4. We request an amendment to the supporting text to draft Policy 2 as follows:

Para 4.3.15 The following major previously developed sites are now inset from the Green Belt: Henley Business Park, HM Prison Send, Keogh Barracks, Mount Browne, Pirbright Barracks, Pirbright Institute, the University of Law Guildford and Merrist Wood College.

Examination in Public

5.5. We wish to appear at the forthcoming Examination in Public to present our case on this matter.
** I object to not protecting the Green Belt (Policy P2) I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43) There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/9593</th>
<th>Respondent: 15483713 / Claire Walker</th>
<th>Agent:</th>
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There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

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<th>Comment ID: PSLPP16/9616</th>
<th>Respondent: 15483937 / Corrine Stevens</th>
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** I AM WRITING TO FORMALLY OBJECT TO REMOVING CHILWORTH FROM THE GREEN BELT.

It is possible for appropriate new development to take place in Chilworth without removing it from the green belt - removing the green belt is not a good way forward nor necessary.

Please make sure my objection is noted and registered - DO NOT REMOVE GREEN BELT PROTECTION FROM CHILWORTH.

Thank you.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<th>Comment ID: PSLPP16/9621</th>
<th>Respondent: 15484033 / Caroline Ali</th>
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There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9632  Respondent: 15484097 / Chris Preece  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Green Belt:

The National policy is clear in that it attaches great importance to the nature of the Green Belt.

The Plan does not show evidence of exceptional circumstances to justify why the Green Belt land should be used for strategic development.

Brownfield land needs more consideration, surely the decline in the need for retail space means that houses could be built in the town centre instead of more retail units, student accommodation should be constructed on campus even if higher rise accommodation is used.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9662  Respondent: 15485121 / Tracey Mansell  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to these areas being inset from the Green Belt: Chilworth, East Horsley, Effingham, Fairlands, Flexford, Jacobs Well, Normandy, Peasmarsh, Ripley, Send, Send Marsh/ Burnt Common, Shalford, West Horsley and Wood Street Village.

There are many brownfield sites and areas which remain open for development which could provide much needed affordable housing for the current population. There are also areas which could provide more housing with a little thought around redesign and redevelopment. This would not mean an influx of more people but affordable housing for the existing population. I believe that the plan is for profit and does not provide for the needs of the current residents of Guildford. Where does the DRAFT Local Plan identify the type, size and potential value of these developments? Where does the Draft Local Plan define affordable, with examples of who would be able to afford to live in these houses. Anybody under 35 looking for a property from 1st April 2016 is now being confined to house sharing and room renting. Where does the plan identify this problem?

Why take swathes of the Green Belt countryside that make this area so beautiful and cover it in concrete, just to line the pockets of the house builders. Once it is gone, there is no going back. I am disappointed in the Draft Local Plan and...
object most strongly. This is nothing more than the road to a dormitory Guildford Borough, property rich and socially and environmentally poor.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9663  Respondent: 15485185 / Roland Mansell  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to these areas being inset from the Green Belt: Chilworth, East Horsley, Effingham, Fairlands, Flexford, Jacobs Well, Normandy, Peasmarsh, Ripley, Send, Send Marsh/ Burnt Common, Shelford, West Horsley and Wood Street Village.

There are many brownfield sites and areas which remain open for development which could provide much needed affordable housing for the current population. There are also areas which could provide more housing with a little thought around redesign and redevelopment. This would not mean an influx of more people but affordable housing for the existing population. I believe that the plan is for profit and does not provide for the needs of the current residents of Guildford. Where does the DRAFT Local Plan identify the type, size and potential value of these developments? Where does the Draft Local Plan define affordable, with examples of who would be able to afford to live in these houses? Anybody under 35 looking for a property from 1st April 2016 is now being confined to house sharing and room renting. Where does the plan identify this problem?

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9666  Respondent: 15485217 / Fiona MacKenzie  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- the loss of the Greenbelt, which will inevitably lead to further development, putting further strain on an already overstretched infrastructure in the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9668  Respondent: 15485249 / Paul Rochester  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I am writing to state my objection to the Guildford Local Plan 2016 and in particular to the removal of Green Belt status from the villages of Shalford and Chilworth.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9670  Respondent: 15485281 / Fiona Stobart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to not protecting the Green Belt (Policy P2)
I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

The Plan should develop the existing brownfield site at Burnt Common rather than developing Garlick’s Arch (A43).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9691  Respondent: 15485345 / Ruth Beavington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

** I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9699  Respondent: 15485409 / Barry & Janet Oakley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The in-setting of any villages removal of the green belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
The Horsleys should contribute to meeting the need for increased housing in the borough. But this should be done in a way that is sensitive to the current environment and without any need to remove green belt ‘status’.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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1. **I object to not protecting the Green Belt (Policy P2)**
   
   I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy. If this development goes through, further green belts within Surrey will be destroyed and eventually Surrey will turn into an extension of London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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The openness of Green Belt land needs to be cherished, respected and permanently protected. This way, Green Belts will protect our countryside and help regenerate our cities. If you go ahead with this, extremely valuable Green Belt land will be lost forever and can never be replaced.

I strongly object to the proposals for building housing on Green Belt land in Ripley, especially on the areas including Wisley Airfield, Garlick’s Arch (Ripley/Send border) and Gosden Hill (Clandon).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I strongly object to the proposals for building housing on Green Belt land in Ripley, especially on the areas including Wisley Airfield, Garlick’s Arch (Ripley/Send border) and Gosden Hill (Clandon). I feel that there has been insufficient consideration of SPA, SSI and any Conservation Area issues.

The openness of Green Belt land needs to be cherished, respected and permanently protected. This way, Green Belts will protect our countryside and help regenerate our cities. If you go ahead with this, extremely valuable Green Belt land will be lost forever and can never be replaced.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9725  Respondent: 15485601 / Tim Jewers  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to creating new Green Belt whilst taking away existing Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9736  Respondent: 15485601 / Tim Jewers  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to any insetting / removal of any villages from the Green Belt.

1. I object to the loss of Green Belt and breaking protection promises.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9739  Respondent: 15485665 / Lynne Davies  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the large scale development of green belt land, in particular at Normandy/Flexford. Guildford has 89% land of green belt and 44% land AONB. I understand that a number of houses and services are required over the next 20 years but believe small scale development is preferred over large developments which put extra burden on our already overcrowded road system. There should be no development of green belt without local resident agreement.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/9762  Respondent: 15485921 / Chris Nairn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to
Any and ALL erosion of the Green Belt
Any “in setting” of villages from the Green Belt A plainly disproportionate amount of development in one area of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9773  Respondent: 15485985 / Jean Dunning  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the removal of Ripley, send and Clandon from the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9797  Respondent: 15486017 / Neil Higgins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

• I object to a Local Plan which reduces the Greenbelt without justification – Once lost this will never be replaced. We have a moral duty to all future generations to protect, except in the most extreme of circumstances, the legacy which has been handed down to our generation by our forefathers

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9790  Respondent: 15486049 / Ceri Schooling  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

•
Not protecting the Green Belt
I object to the proposals to remove Ripley, Send and Clandon from the Green Belt. We must protect the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9811  Respondent: 15486081 / Rosie Ainsworth  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to all insetting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9807  Respondent: 15486113 / Ian and Margaret Walker  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We are writing to object to the Local Plan proposals for West Horsley on the following grounds:

1 - Objection to removing West Horsley from the Green Belt:

The Local Plan categorically states "that we will continue to protect the Metropolitan Green Belt " - understandable, as the fact is, the village has absolutely no infrastructure in terms of doctors, very limited bus service, one small shop, poor roads and a school already operating at capacity.

We were resident at 23 East Lane for over 30 years until 2007 and continue to visit regularly as one of our sons bought the property and now lives there with his family. Since we left the infrastructure has not changed apart from the fact that there is no longer a post office and the traffic has increased considerably.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9821  Respondent: 15486177 / Daniel Peyton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/9830  Respondent: 15486305 / Noel Ainsworth  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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Comment ID: PSLPP16/9844  Respondent: 15486849 / Eric Waestaff  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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Comment ID: PSLPP16/9921  Respondent: 15486881 / Mark Langton  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Comment ID: PSLPP16/9922  Respondent: 15486913 / Sarah Langton  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPP16/9923  Respondent: 15486945 / J Hazelton  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
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Comment ID: PSLPP16/9864  Respondent: 15486977 / P Jefferson  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
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Comment ID: PSLPP16/9945  Respondent: 15487009 / Yvonne Peyton  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
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Comment ID: PSLPP16/9924  Respondent: 15487649 / Paul Adams  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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Comment ID: PSLPP16/9910  Respondent: 15487713 / Rod Edgell  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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I am sending this email to formally object to the taking out of Chilworth, Shalford and Peasmarsh with possible other villages from the Green Belt areas. This is obviously designed to enable many more houses to be built in these areas.

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Comment ID: PSLPP16/9918  Respondent: 15488065 / Heather Beaver  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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Comment ID: PSLPP16/9934  Respondent: 15488193 / Tracey Butler  Agent:

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Comment ID: PSLPP16/9949  Respondent: 15494977 / Carol Adams  Agent:
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Attached documents:

Comment ID: PSLPP16/9956  Respondent: 15495201 / Viliv Viana  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Attached documents:

Comment ID: PSLPP16/9968  Respondent: 15495233 / Harriet Philips  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Attached documents:

Comment ID: PSLPP16/9982  Respondent: 15495265 / Stephen McGuckin  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
I object to the extent of development planned within the Metropolitan Green Belt.

Policy P2 states that Guildford Borough Council ‘…will continue to protect the Metropolitan Green Belt.’ An explanation is required detailing how the green belt is being protected when greater than 65% of the proposed developments will take place on land currently within the Metropolitan Green Belt.

As an example, of the 13,860 planned new homes only 1,172 will be built in Guildford Town Centre and 1,570 in the Guildford urban area, that is a total of 2,742. On the other hand, 2,533 are planned to be built within a three mile radius of the Horsleys which is currently within the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/10532</th>
<th>Respondent: 15495393 / M Rendell</th>
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<td>I OBJECT to the interpretation of Policy P2 (Green Belt) It would appear that the villages of Flexford and Normandy are now removed from the greenbelt to achieve the objectives of the draft plan rather than the green belt being considered as a valid constraint. Anyone visiting the site and walking along the public footpaths that cross the site would surely agree that this land significantly contributes to “openness” both between Flexford and Normandy, and also ensuring openness between Flexford and Ash/Ash Green (which is only a modest walk away).</td>
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<td>Whilst I APPROVE the change to put much of Normandy and Flexford (sites A46 and A47) back into greenbelt (compared to the previous draft plan), I OBJECT to the insetting of the two settlements, and they should instead be &quot;washed over&quot; by greenbelt, in order to prevent precedent building up through piecemeal development over time, which would threaten the Greenbelt corridor that is currently established. This area is an asset to the borough in terms of open space and is accessible to many via the Wanborough station. Strategies to protect this must be clear in the plan.</td>
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<td>Do not inset the settlements of Normandy and Flexford, but instead ensure the Greenbelt washes over them.</td>
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<th><strong>Respondent:</strong> 15495585 / Cristiano Vitor De Oliveira</th>
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Attached documents:

Comment ID: PSLPP16/10336  Respondent: 15495617 / Peter Elliot  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Comment ID: PSLPP16/18646  Respondent: 15495617 / Peter Elliot  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I would also like to object to the secretive and high-handed way in which the SHMA process has been The annual house building target is more than double what was agreed in 2010, and more than double what could be explained by the population growth figures for Guildford for the last twenty years. Also, unlike last time, no constraints have been applied for infrastructure or environmental factors, with no explanation offered as to why. GBC has repeatedly refused to involve their electorate in discussing this matter, and has steadfastly refused to explain what factors could account for this huge hike in the annual house building target. All we do know is that G.L. Hearn, who did the SHMA, has a vested interest in setting the figure as high as possible, to generate work for their associates at Constructionline. Government guidelines state that the community should be able to feel confident that the SHMA figure is fair and objective. For the reasons given, GBC has failed woefully in this regard.

Consequently I object to the way the plan proposes to put 70% of the new houses on the Green Belt around Guildford, as this is surely the worst possible option for exacerbating traffic congestion, while putting more of the housing on brown field sites within the town would mean people could walk or cycle to the station or the shops. To make matters even worse, much of the brownfield sites are proposed for commercial use, drawing even more traffic into the town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10010  Respondent: 15495649 / Stephen Cruse  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to not protecting the Green Belt (Policy P2)

I object strongly to the proposals to remove the following villages from the Green Belt, Ripley, Send Clandon, Wisley Airfield (A35) and Garlicks Arch (A43). NPP states there needs to be exceptional circumstances for both Green Belt boundaries to be altered and development on Green Belt – these are not exceptional circumstances. These neighbouring villages will merge into one another as a result of the loss of this Green Belt resulting in urban sprawl and loss of the beautiful countryside.

This could be avoided at Garlicks Arch by developing on existing brownfield site just to the south of the site at Burnt Common where there is surplus land affording development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10337  Respondent: 15495681 / Pippa Mathews  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Attached documents:

Comment ID: PSLPP16/10017  Respondent: 15495745 / David Williams  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing to object to the local plan for the Horsleys 2016. There are no exceptional circumstances which have been demonstrated and which are required to take East and West Horsley out of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10340  Respondent: 15495777 / Michael Lowe  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
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<td>Green Belt</td>
<td>I strongly object to GBC considering building new developments of 2,000 houses in Green Belt. I object to Gosden Hill, Blackwell Farm and the former Wisley Airfield becoming new towns 'dumped' in the Green Belt for reasons of economy and convenience. I particularly object to the former Wisley Airfield being considered for a new town as this</td>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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is slap bang in the middle of a green belt area and totally unsustainable as accepted by the recent Planning Committee who recently unanimously rejected a planning application on various NPPF grounds. This site is far too close to Cobham (1.5km), Pyrford (1.5km) and Woking (2.5km) not to become their urban areas over time which will totally wipe out green belt in this area.

Developments of 2,000 houses in the Green Belt are exploitation and fulfill developer's dreams who can escape their their affordable homes targets (clause 4.2.40) and provide houses for those from outside the borough. I object to GBC realising those developers dreams and ignoring those of the residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10342  Respondent: 15495905 / Emma Marshall  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Comment ID: PSLPP16/10056  Respondent: 15495937 / C Aruncel  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
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Attached documents:

Comment ID: PSLPP16/10065  Respondent: 15495969 / Olivia Doyle  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
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Comment ID: PSLPP16/10343  Respondent: 15496001 / Ryan Hookind  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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Comment ID: PSLPP16/10344  Respondent: 15496033 / Sophie Hart  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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Comment ID: PSLPP16/10088  Respondent: 15496129 / Ella Doyle  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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Attached documents:

Comment ID: PSLPP16/10320  Respondent: 15496353 / P.J. McGregor  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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Comment ID: PSLPP16/10481  Respondent: 15496353 / P.J. McGregor  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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Attached documents:

Comment ID: PSLPP16/10485  Respondent: 15496353 / P.J. McGregor  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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Comment ID: PSLPP16/10327  Respondent: 15496545 / Gillian Frampton  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
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Attached documents:

Comment ID: PSLPP16/10497  Respondent: 15496545 / Gillian Frampton  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
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10. I object to development in areas which are at risk of flooding such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10118  Respondent: 15496609 / Dena Parker  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to all insetting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/10120</th>
<th>Respondent: 15496897 / Iris Watts</th>
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<td>It was introduced to prevent Britain becoming an URBAN SPRALL!!!!</td>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10329  Respondent: 15496993 / nigel stirraker  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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Comment ID: PSLPP16/10475  Respondent: 15496993 / nigel stirraker  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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Comment ID: PSLPP16/10328  Respondent: 15497057 / S McMarken  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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Attached documents:
Comment ID: PSLPP16/10167  Respondent: 15497505 / Jyoti Nanda  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick's Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a 'special circumstance' and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick's Arch, so there is no evidence base to support including this site.

Rather than developing Garlick's Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10154  Respondent: 15497537 / Caroline Sheppard  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10162  Respondent: 15497601 / Ben Hicks  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10165  Respondent: 15497633 / Diane Nichols  Agent:
I feel strongly that the Green belt should be retained and the proposed loss is unreasonable and irreversible.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to all insetting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1. Just how much green belt do we require for the rejuvenation of our souls? As a keen dog walker I am struck by how under-used our green belt is. Considering there is something like half-a-million people living within 5 miles radius of Guildford it is odd how few people I meet when out with my dog - up St Martha's, the Chantries, or Newlands Corner - with regard to the latter there are more people sitting in cars than out walking. I meet more dog walkers in Sutherland Park than in the previous mentioned beauty spots.

2. There is a large amount of over-rated green belt - more scrubland than stimulating green environment. The quality of green environment matters more than mere quantity. So guard our Surrey Hills with all your might but there is a great deal of so-called boundary or in-between zones that do not constitute stimulating environment.

3. Although there is a great deal of green belt that could be declassified, I am not saying it should all be built on. It is vital to get the density of housing right. It is essential to have adequate availability of park space for sport and social activities. Most people are not looking for one hour walking trails but rather ten to twenty minute walks space where they can get away from traffic noise. Merrow Downs might not be groomed for football but it serves as a very pleasant walking and picnic space.

4. Another aspect of the local Green Belt worth preserving (and developing) are the various water meadows. These are marvellous for the variety of wildlife they support. No doubt these water meadows play a part in flood management.

5. Planners just have to come up with a figure for the ratio of housing to recreation space and stick to it. Green belt restrictions are forcing developers to pack houses into small pockets of Brownfield sites with the result houses...
are becoming too small for effective family living and with inadequate parking spaces. Green Belt restrictions are acting as a choke on the quality of the housing stock. Retirees need bungalow type houses that are all on the flat. This is not so efficient in terms of land use, but such houses are in short supply.

6. It is depressing to hear the whining of the Nimbies. All they want is their green surroundings retained for their status quo. If their views were acted on all house building would come to a halt. This clearly would be a farcical situation. After all, probably half the population of the wider Guildford area are living in houses that were built on pristine green fields within the last 60 years.

7. Obviously, issues of adequate infrastructure, environmental sustainability and flood management have to be recognised and catered for. But we are talking about housing developments taking place over the next twenty years. GBC has to come up with impact statistics and published proposals for dealing with these challenges in advance of the new township developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10186  Respondent: 15497857 / Elisabeth A Hawkey  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the use of Green Belt land the protection of which, was and still is, a Government priority. Guildford Borough Council are stealing it from under our noses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10196  Respondent: 15497889 / Hugo Wadey  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Comment ID: PSLPP16/10201  Respondent: 15497953 / Rebecca Dougherty  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
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<th>Respondent: 15498049 / Natasha Howard</th>
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<th>Comment ID: PSLPP16/10230</th>
<th>Respondent: 15498241 / Faye Church</th>
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<th>Respondent: 15498785 / Catherine Elingworth</th>
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Attached documents:

Comment ID: PSLPP16/10251  Respondent: 15499073 / Amelia Pinder  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing to object to the local plan. My reasons are the following:

First I would like to say I don’t think you should stick to the local plan, building on the green belt because it will badly affect poor aminals e.g. nesting birds like by me.

It will also affect people in Horsley because you wouldn't be able to enjoy the space and for children they might play there so it will affect them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10255  Respondent: 15499297 / Alex Mundy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Settlement Boundary which has been imposed on East Clandon without any consultation. This imposition provides no protection to further development outside of the settlement boundary (Policy P2 para 4.3.25) and I deem as being unnecessary in an already tightly developed ancient and rural conservation village with high archaeological potential. I demand that this proposal be removed as it will endanger the openness of the Green Belt, the views in and out of the AONB (protection of the AONB Policy P1) and the character of our village.

Policy P2 – Green Belt: I object to this significant erosion of the Green Belt with the proposals for large towns being developed on Green Belt land thereby removing the openness of the Green Belt. I note in particular the huge developments proposed for the North East quadrant of the borough which will adversely affect our amenity, but also unfairly targets our tranquil rural villages because we can provide ‘dormitory’ facilities for commuters to London. These developments directly affecting our villages are the proposals for Wisley Airfield, Gosden Hill Farm, various farms and tracts in the Horsleys and Garlicks Arch at Send.

Further, on the erosion of Green Belt and I object that Policy P2 is not met where it states that Green Belt should be protected. I object to the disproportionate use of Green Belt land for housing – some 65% of the housing proposed is on Green Belt and with little consideration being given to redevelopment of brown field sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10261  Respondent: 15499297 / Alex Mundy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
I object that GBC are contravening the NPPF framework stipulation in paragraph 87 with the proposed developments at Gosden Hill Farm, Ripley, East and West Horsley and Garlicks Arch, Send. Paragraph 87 states “As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.” and GBC have not proven any special circumstance for developing on these Green Belt areas.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/10269</th>
<th>Respondent: 15499873 / Pan Illingworth</th>
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<td>While welcoming the removal of site allocations A46 and A47, I object to the proposed Green Belt boundary amendments that would result in the Normandy and Flexford settlements being inset from the Green Belt. The statement in Policy P2 that these villages (among others) are now inset presupposes that the proposal indicated on the map at Appendix H has been approved, so it is unjustified. Evidence of &quot;exceptional circumstances&quot; for these changes has not been provided. Furthermore the proposed boundary changes are incompatible with the principle of &quot;openness&quot;, would be detrimental to the preservation of the character of the villages and would risk unmanageable pressure on local infrastructure.</td>
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I object to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick's Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

Rather than developing Garlick's Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

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<th>Comment ID: PSLPP16/17100</th>
<th>Respondent: 15501217 / Luke Sarti</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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<td>I OBJECT to altering the green belt boundaries. Para 83 NPPF states green belt boundaries can only be altered in exceptional circumstances and where there is local support. Meeting the housing need is not exceptional circumstances. This has recently been reiterated by Central Government. No exceptional circumstances have been demonstrated.</td>
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<td>I OBJECT to the area described as West Horsley (south) being removed from the green belt. This clearly meets the description of a village that should be ‘washed over’ by the green belt in terms of size, appearance and character.</td>
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Comment ID: PSLPP16/10310  Respondent: 15501313 / Matthew Dougherty  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to all insetting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10317  Respondent: 15502113 / Paul Gaffikin  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10323  Respondent: 15502177 / Steve Plewis  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to all insetting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10468  Respondent: 15502209 / Shirley Atkinson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to not protecting the Green Belt.

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council's to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.
The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of "only" 1.6% of the borough's Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an "acceptable" percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council's growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers' hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the "insetting" of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the "openness" of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF's other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To "inset" two-thirds of the borough's rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough's location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed "insetting" and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17's aim of "empowering local people to shape their surroundings" and other NPPF provisions.

Paragraph 4.3. 17 states that "the general extent of the Green Belt has been retained." I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called 'strategic sites' of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick's Arch (A43) and all other strategic sites.
National Planning Policy requires there to be an exceptional circumstance for the Green Belt to be altered, and the development of Green Belt sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether "exceptional circumstances" existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

1. Having determined housing need the Council was entitled to consider constraints before determining the housing. I believe that as III as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as III as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

2. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless "exceptional circumstances" for development are proven in relation to that specific site, as stipulated repeatedly in the The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it...
cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10466  Respondent: 15502241 / Richard Atkinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to not protecting the Green Belt.

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council's to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of "only" 1.6% of the borough's Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an "acceptable" percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council's growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers' hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

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To "inset" two-thirds of the borough's rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough's location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed "insetting" and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17's aim of "empowering local people to shape their surroundings" and other NPPF provisions.

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National Planning Policy requires there to be an exceptional circumstance for the Green Belt to be altered, "special circumstances for these sites and villages (as mere housing need does not constitute a 'special circumstance') to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC's Green Belt & Countryside Report does not address Garlick's Arch, so there is no evidence base to support including this site.

Rather than developing Garlick's Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10689  Respondent: 15502241 / Richard Atkinson  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that "allocating these sites does not grant planning permission for development." However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.
2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether "exceptional circumstances" existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

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2. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless "exceptional circumstances" for development are proven in relation to that specific site, as stipulated repeatedly in the The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10332  Respondent: 15502305 / S. Gibbs  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to all insetting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10338  Respondent: 15502433 / Jill Murphy  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Green Belt Objections

I OBJECT to the Local Plan because it seeks to build on Green Belt land unnecessarily. The work of Professor Anne Power at the London School of Economics, amongst much other expert research, clearly demonstrates that there is more than sufficient land to build all the houses that are needed without taking any of the Green Belt. In our area several
studies show that unused brownfield sites in Guildford Town itself are capable of yielding most of the required land. GBC has not properly explored the capacity which is available there or on brownfield sites elsewhere in the borough, which would have provided a sensible starting point since GBC own many of them.

I OBJECT to the Local Plan in that GBC’s approach to the Green Belt introduces a concept of grading its quality. This is an alien concept, not recognised in law. Of course some Green Belt is seen to be better than other Green Belt but the law does not make any distinction, nor should it. It depends who is looking at it and from what standpoint they are looking. Green Belt is Green Belt and it is not for GBC to stand in judgement on what bits it thinks are worth keeping and what are not.

I OBJECT to proponents of the plan representing those against it as “nimbys”. Those against are not against building houses. They recognise the need for them. They are against building them in unsuitable, unthought out locations which damage existing amenities. This relates particularly to building them on Green Belt land, thereby destroying an existing amenity, when it is not necessary to do so.

I OBJECT to the Local Plan because it seeks to promote sites for houses with woefully inadequate attention being paid to the infrastructure to support those sites. Without proper infrastructure none of the identified sites will deliver what is claimed for them. No detailed thought has been given to the form of the infrastructure required, still less to how much it would cost and, it would appear, none at all to where the money for it would come from.

I OBJECT to removing Send and other villages from the Green Belt. The Green Belt was intended to be permanent, and its permanence was enshrined in law through the National Planning Policy Framework, reinforced by the NPPG and a succession of Ministerial guidance statements. For all of this to be overridden requires “special circumstances” which do not exist in the case of Send.

I OBJECT to all four proposed sites in Send because they are all in the Green Belt and not one of them displays the very special circumstances which would be needed in order to outweigh the substantial harm caused by reason of inappropriateness. There is abundant legal authority but I would cite the Court of Appeal cases of City of St Albans v Hunstan Properties and Gallagher Homes v Solihull Metropolitan Council. These precedents, which have been ignored by Guildford Council before, show that it is necessary to demonstrate that harm to the community at large, by taking the Green Belt, would be less than if it was not taken. The crucial words are “to the community at large”. Paragraph 47(1) of the NPPF advises local authorities “to ensure that their local plans meet the full, objectively obsessed, needs for markets and affordable housing in the housing market area as far as is consistent with the policies set out in this framework”. As the Court of Appeal has made clear one cannot rely on objectively assessed needs without having regard to the policy constraints. The qualification in this clause “as far as is consistent with” is not qualifying housing need; it is qualifying the extent to which the local plan should go to meet those needs. It is quite clear from the precedents that exceptional circumstances will not exist unless the potential harm to the Green Belt has been shown to be clearly outweighed by other considerations. In other words harm to the Green Belt is included in the factors which the NPPF requires to be taken into account.

The NPPF further states that in their local plans local authorities are required to meet objectively assessed housing needs “as far as is consistent with the policies set out in this Framework”. The policies referred to include Section 9 - Protection of the Green Belt. The Court of Appeal has clarified the interpretation of this by stating categorically that there may be nothing very special about a housing shortfall in an area which has very little undeveloped land outside the Green Belt. The key question is not “is there a shortfall in housing land supply?” You have to ask “have special circumstances been demonstrated to outweigh the Green Belt objection?” And such circumstances are not demonstrated simply because there is a less than five year supply of housing land. Special circumstances will not exist unless the potential harm to the Green Belt is clearly outweighed by other considerations. The draft plan has not begun to demonstrate that there are exceptional circumstances and indeed offers very little to suggest that the authors have even read what the Court of Appeal has said about the provisions in the NPPF.

It is noted that the Court of Appeal precedents have been ignored before by GBC, which appears to regard itself as over and above the law. GBC seems willing to expend residents’ funds on counsel’s advice, in support of what its client developers want to do, but cannot bring itself to get a QC’s opinion in order to guide it on understanding the case law that actually exists, which manifestly it does not understand.
Given the large amount of Green Belt in Guildford Borough, the council can legitimately argue that it does not have to match the housing targets of boroughs with less Green Belt. But if Guildford wants to match the housing target which would apply if it was not constrained by the Green Belt, it can still do so using brownfield land which is in plentiful supply. It is difficult to avoid the conclusion that it has not taken either of these legitimate routes because it finds the allure of developers’ propositions on green field sites more attractive. GBC should also note that the Green Belt was created not just for the benefit of local residents. It came to be known as the Metropolitan Green Belt because it was intended to be of benefit to a much wider range of people, especially Londoners visiting open spaces outside but near to London. It is beyond the remit of GBC to arrogate to itself the power to override Parliament’s intention.

I OBJECT to any sort of diminution of Send’s Green Belt because it provides an essential buffer stopping Woking and Guildford becoming one conurbation. It has served this purpose effectively since its inception and should continue doing so for the benefit of subsequent generations living here. No group of councilors, especially without a mandate, has the authority to impose a different future on residents.

I OBJECT to any reduction in Send’s Green Belt because so much land in Send provides the setting for the beautiful Wey Navigation corridor, which is a conservation area that enhances biodiversity, is visually important, provides a valuable leisure facility and combined with the surrounding lakes an exceptional habitat for a wide range of bird species and other wildlife.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1756  Respondent: 15502433 / Jill Murphy  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO THE PROPOSAL TO INSET SEND BUSINESS PARK FROM THE GREEN BELT BECAUSE:

Further expansion of development of this location detracts from the intended openness of our Precious GREEN BELT, and is totally inappropriate.

It is a an Old Non Conformer user in an area of outstandingly beautiful countryside adjacent to the lovely River Wey Navigation Canal.

Tannery lane is a twisty narrow country lane with very restricted vehicle use in both directions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11807  Respondent: 15502465 / Mark Bourner  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Removal of the Horsleys from the Green Belt - The green belt was put in place to stop towns and villages running into huge unbroken settlements. I feel it is wrong to just arbitrarily decide that it now suits the council to change the green belt, therefore our village is being removed. It is also against the policy that says ‘exceptional circumstances’ are required to make this change. There are no exceptional circumstances that have been provided to justify this change.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to not protecting the Green Belt (Policy P2)
I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

The Plan should develop the existing brownfield site at Burnt Common rather than developing Garlick’s Arch (A43).

I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

The Plan should develop the existing brownfield site at Burnt Common rather than developing Garlick’s Arch (A43).

I OBJECT to all insetting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley

I have been a resident in East Horsley for 30 years and I am appalled and strongly object at the proposal of Guildford Borough Council plans to inset East/West Horsley from the Green Belt.

I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

The Plan should develop the existing brownfield site at Burnt Common rather than developing Garlick’s Arch (A43).
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Attached documents:

Comment ID: PSLPP16/10397  Respondent: 15503169 / A Palitchell  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10426  Respondent: 15503265 / Harriet Richardson  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

6 GREENBELT

6.1 The key restriction regarding the development of the land at Fairlands site is its Green Belt There are 5 purposes to the Green Belt which have been set out below in relation to this proposed allocation site.

To check the unrestricted sprawl of large built-up areas

6.2 The land to the west and south west of Fairlands adjoins the settlement of Fairlands, 2.6 miles north of Guildford. The western boundary of the site is constrained by the existing development of Littlefield Manor, including Littlefield Manor Riding School and the extent of the flat, developable area of land. The northern boundary is heavily wooded between the site and the Aldershot Road. The eastern boundary is formed of residential streets. The southern boundary is restricted by an existing track and an established row of clustered mature trees. The site is therefore largely contained, and the less defined boundaries to the south and west could be strengthened through additional soft landscaping. It is therefore considered that this site is not required to be in the Green Belt in order to prevent the village from sprawling.

To prevent neighbouring towns merging into one another

6.3 The proposed extension to Fairlands would be to the west of the settlemen The nearest development to the west is a row of housing along Frog Row Lane. This is 1.2km from the existing western boundary of Fairlands and would still be 1km away should the site subject of this report be developed. The nearest village to the west is Willey Green which is 2km west of Fairlands. It is therefore considered that there is no risk of the proposed development of the site resulting in neighbouring settlements merging together.

To assist in safeguarding the countryside from encroachment

6.4 As set out in the two points above, the site is largely contained by existing development and mature woodland and veget Development of the site would allow for a sustainable extension to an existing settlement.
To preserve the setting and special character of historic towns

6.5 Fairlands is not considered to have any special or historic character. The settlement was first built in the 1930’s with the majority of development taking place in 1960’s. The settlement is not considered to contribute to the setting of any nearby historic towns and therefore does not meet this purpose for land being within the Green Belt.

To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

6.6 The West Surrey SHMA found that the objectively assessed need was 1,729 homes per annum for the region between 2013 and 2033, 693 of which are to be provided within the Guildford local planning area per annum. It is therefore necessary for the Local Planning Authority to consider a range of sites, both brownfield and green. Of course brown field sites should be developed first, however the Council has recognised that the existing available brown field sites within the area are not sufficient to meet current housing requirements. There is therefore a clear indication that the Council will need to identify Greenfield land, much of which will be Green Belt if it is to meet housing requirements. In addition, Policy 2 of the Borough Wide Strategy clearly indicates that Green Belt land will need to be released for development in order to meet the OANs for the borough. On this basis there is a strong case for this identified site to be removed from the Green Belt to allow for beneficial development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10409  Respondent: 15503361 / James Pasfield  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to all insetting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10402  Respondent: 15503457 / Patrick Lea  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

The Plan should develop the existing brownfield site at Burnt Common rather than developing Garlick’s Arch (A43).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/593  Respondent: 15503457 / Patrick Lea  Agent:
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<td>Finally I object to the proposal to inset Send Business Park from the greenbelt because it is inappropriate and detracts from the local greenbelt.</td>
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I OBJECT TO "in-setting" of any villages including Ripley, Send and Send Marsh/Burnt Common from the Green Belt. The Green Belt legislation was introduced to ensure clean air areas between around towns and cities following WW2 – currently Junction 10 of the M25/A3 has high levels of pollution and this will simply increase pollution levels across an extensive residential area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I strongly object to the proposed changes to the Green Belt Boundary to inset my village and about 13 other villages from the Green Belt. All the villages should remain in the Green Belt. If someone hadn't had the vision to create the Green Belts before I was born, I am sure my village and the countryside around it would just be urban sprawl by now. It would not be here for the thousands who come out from London every week to cycle or walk or simply be in the countryside. It would not be here to act as green lungs for the whole of England, to contribute towards easing the climate problems we are creating, to help to maintain biodiversity. I have been lucky enough to grow up here, so I see how important it is for others. I also know the Walton, Weybridge, Byfleet area and Staines, Egham, so I can see what happens when anything happens to allow higher density development in - urban sprawl. This is too important to risk. The Green Belts are not ours or yours to give away, but a precious gift to be preserved for my children and their children.

89% of Guildford Borough is in the Metropolitan Green Belt. The Local Plan should have the protection of the Green Belt at its heart. The Green Belt was always intended to be permanent and its boundaries cannot be changed except in exceptional circumstances. You have shown no exceptional circumstances under the NPPF for the Green Belt boundary to be changed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

It is fundamental that there are no exceptional circumstances for East and West Horsley to be taken out of the Green Belt. Any additional housing should therefore be small scale. I object to the extension of the settlement boundaries by the redrawn insetting boundary. This can only be to try and make more land available for what has been shown to be inappropriate development and included in an enormous document so that they will probably be missed by residents. I particularly object to the inclusion of Kingston Meadows, land owned by GBC and previously dedicated as open space for the use and benefit of the community. That is a key green space and recreational area where I have used the play
parks, bike humps, trim trail and football pitch for decades with friends from the village and outside. It is used by hundreds of dog walkers and for village celebrations. No change to the settlement boundary has been justified. **I object** to the inclusion in the Plan of six large housing sites in the Green Belt **outside** the two villages (A36 - 41). They should be removed from the Plan as they are contrary to the Green Belt and to include them preempts proper decision making. I object to a Plan which allocates Housing disproportionately to the Green Belt villages and in particular the Ockham, Send, Horsleys area. This is morally and legally wrong and contradicts your Vision. A proper assessment of urban brownfield sites should provide enough sites for housing to be allocated at least proportionately as between the urban area and villages.

In addition I draw your attention to the very serious existing problems in the village with infrastructure - roads, flooding and drainage, sewage, etc - and facilities - schools, doctors, failing businesses, no useful buses, to mention just a few. There is a high dependence on car use. We walked to school for years but were part of a very small number because people said they were to frightened of the narrow roads and traffic! There is flooding along the roads almost every time it rains. For these reasons a large increase in housing is not feasible. It would also destroy the character of the village and of the Green Belt which surrounds it. For all the reasons given above, I am against anything other than small scale additions to housing in East and West Horsley.

**I object** to the revised Settlement Hierarchy with another meaningless tick box exercise. East Horsley is not a rural district centre within any ordinary meaning of the phrase. People do not come from outlying areas to East Horsley for shopping or work, they go to Guildford, Dorking, Leatherhead or other urban areas, including Surbiton, Kingston and London. East Horsley is not suitable for town centre type developments and **I object** to this policy (E8).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPP16/16323  **Respondent:** 15503969 / Katy Denham  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Green Belt**

I strongly object to the proposed changes to the Green Belt Boundary to inset the named villages from the Green Belt (including Policies S1, S2, P2). All the villages should remain in the Green Belt.

89% of Guildford Borough is in the Metropolitan Green Belt. The Local Plan should have the protection of the Green Belt as its cornerstone. The Green Belt was always intended to be permanent and its boundaries cannot be changed except in exceptional circumstances. You have shown no grounds for the Green Belt boundary to be changed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPP16/10509  **Respondent:** 15504001 / Margaret Banks  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I **OBJECT** to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is
gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.
In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attended documents:

Comment ID: PSLPP16/10534  Respondent: 15504065 / Sandra Moreton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I wish to object to the proposal to remove Green Belt protection from Chilworth village and those surrounding it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attended documents:

Comment ID: PSLPP16/10588  Respondent: 15504129 / Simon Hurdle  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy P2 - Green Belt

I object – to the proposed insetting of villages from the Green Belt, and the green light given to infilling. This means to villages are open to development as well as the allocated sites. Green Belt protection is national policy – its protection was strongly promoted by national political leaders in the 2015 General Election and by most candidates, including those of the majority party in Guildford, in the 2015 Local Elections. Appeal case law has shown that even if housing need does exist, that does not automatically over-ride the protection accorded by the Green Belt legislation.

Guildford B.C. claims that less than 2% of Green Belt will be lost, but factoring in the insetting of villages the figure appears to be nearer 6%.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attended documents:
Comment ID: PSLPP16/10624  Respondent: 15504609 / Ian Little  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing to you to object to the removal of the Horsleys from the green belt. I do not agree that the exceptional circumstances required to do this have been met or demonstrated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10629  Respondent: 15504641 / Stanley Jackson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I write as a resident of West Horsley in support of retaining the Horsleys status as part of the green belt which continues to serve its original purpose of providing a useful escape from urban encroachment – a much appreciated open space to counter over development.

However this should not be taken as endorsement for the overly negative approach taken by most local planners who seem obsessed with maintaining the status quo irrespective of the needs of a thriving and growing community. Sensible plans which add to the housing stock and which are consistent and commensurate with existing structures would be welcome. Too often the planners say no when they might easily loosen some planning guidelines which do not involve building brand new properties on pristine green belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10663  Respondent: 15504801 / M A Lawrence  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I refer to the proposed planning in West Horsley, the extent of which is entirely unacceptable.

The latest plan indicates over 530 new homes for The Horsleys. This level of new housing would COMPLETELY change the character of the village, not to mention the impact it will have on its infrastructure.

*Green Belt*

**You seem determined not to respect the green belt.** How can you possibly consider removing these villages from the green belt??

We moved to West Horsley nearly three years ago and chose this area specifically because we wanted a village environment to bring up our daughter.

We wanted to get away from traffic and congestion and enjoy the green belt around us.
The proposed development of homes on green belt sites at much higher densities than currently exist would be totally out of character with existing housing. It is also unsustainable in terms of drainage, road capacity, schools, shops, medical facilities, parking and public transport.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10670  Respondent: 15504833 / Robert Lynch  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Send village being removed from the Greenbelt. This will open a door to developers who will completely change the nature of Send as a buffer between Woking and Guildford

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10694  Respondent: 15504929 / William Scott  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to not protecting the Green Belt (Policy P2)

I object to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick's Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

Rather than developing Garlick's Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10695  Respondent: 15504993 / Harry Eke  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
• **I OBJECT** to the impact on the greenbelt status of the villages.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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I object to these areas being inset from the Green Belt: Chilworth, East Horsley, Effingham, Fairlands, Flexford, Jacobs Well, Normandy, Peasmarsh, Ripley, Send, Send Marsh/ Burnt Common, Shelford, West Horsley and Wood Street Village.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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I object to not protecting the Green Belt (Policy P2)

Removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) would utterly destroy the character of the area. This must be avoided at all costs. Retention of the UK's Green Belt has been supported by every government for decades and has always been more critical the closer to London. It would be intolerable if the London sprawl is allowed to extend to Guildford and beyond its southern borders.

There are more than enough brownfield sites in the Guildford area that should be developed for the Plan.

There are no exceptional circumstances for these villages and sites being removed from the Green Belt, as required by the National Planning Policy (Policy P2).

**Central Government state clearly that housing need is not an exceptional circumstance.**

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10756  Respondent: 15505793 / Edward Goddard  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10758  Respondent: 15505857 / Karen Hookham  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

P2 Please do not approve the plans to build on Guildford Greenbelt land.

The surrounding green spaces are areas of extreme beauty, home to many wild animals and beautiful rare birds such as wild deer, shrews, kites and buzzards. Where will they go if the land is lost?

As a keen horse rider in the local area, I am disheartened that the beautiful landscapes and historic woodlands, once built on will be lost forever. Never replaceable. Gone. Forever.

The fields would no longer absorb the rainfall, deterring flooding to the local population.

Please, please do not build on the greenbelt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10769  Respondent: 15505921 / Andrew Forest  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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Comment ID: PSLPP16/10799  Respondent: 15506177 / Jean Calas-Hathaway  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
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Attached documents:

Comment ID: PSLPP16/10830  Respondent: 15506209 / Rosemary Richardson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? (), is Sound? (), is Legally Compliant? ()

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Attached documents:

Comment ID: PSLPP16/10792  Respondent: 15506241 / Penny Whitlock  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? (), is Sound? (), is Legally Compliant? ()

The Green belt is meant to be protected land. Have you really exhausted all other possibilities?

This breaks a long standing agreement that Green belt is protected from development. People will not trust you to protect them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10831  Respondent: 15506305 / Pamela Sadler  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? (), is Sound? (), is Legally Compliant? ()
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10805  Respondent: 15506369 / Sheila Jennings-Giles  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the removal of 15 villages, including Ripley and Send, from the green belt. This will lead to wholesale, and often inappropriate developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10835  Respondent: 15506401 / Alicia Robinson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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I OBJECT to all insetting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPP16/10836  Respondent: 15506433 / Geoffrey Robinson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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Comment ID: PSLPP16/10810  Respondent: 15506465 / Lisa Garner  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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I object to not protecting the Green Belt (Policy P2) Removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) would ruin the area and cannot be allowed. The UK's Green Belt has been supported for years and is critical so close to London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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the loss of the green belt. I object to the areas of Ripley, send and clandon being removed from the green belt. Once removed they can never go back to the quaint villages they are now. Also the problem we have with urban sprawl only gets worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPP16/18617  Respondent: 15506817 / Reno Hornblow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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I [redacted] objects to -

1) all erosion of green belt
2) removal of villages from the green belt
3) disproportionate amount of development in one area of the borough
4) limited consultation period
5) last minute inclusion of new sites with less than 2 weeks to go
6) lack of evidence for housing numbers needed
7) lack of immediate provision needed for new schools
8) lack of any immediate provision for doctors surgery S
9) and development at garlic arch
10) increased traffic that would be cause in which a village such as Ripley already cannot sustain its current demand without long tailback and
11) dangerous size vehicals manoeuvring in roads that has little or no pedestrian path way due to increased traffic
12) lack of parking in the village for the present day users let alone if more were to be housed
13) the use of countryside areas for which the area is so well know to build more properties

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPP16/10877  Respondent: 15506881 / Chloe Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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<td>I object to not protecting the Green Belt (Policy P2)</td>
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<td>I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.</td>
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<td>The Plan should develop the existing brownfield site at Burnt Common rather than developing Garlick’s Arch (A43).</td>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11012  Respondent: 15507841 / Mark Fenner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to all insetting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11010  Respondent: 15507873 / Andy Tupper  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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I OBJECT to all insetting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11009  Respondent: 15507905 / Hannah Lewis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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I OBJECT to all insetting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11006  Respondent: 15508001 / Lisa Barwick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11004  Respondent: 15508033 / D Worship  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to all insetting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11003  Respondent: 15508065 / Christina Worship  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to all insetting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2205  Respondent: 15508257 / Andrew Whitehall  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT most strongly to the removal from the Green Belt of homes in Guildford Road, northern end of Glaziers Lane, Flexford & Walden Cottages as these areas were identified, by the Council, as contributing to the “openness of the Green Belt”, so these areas should remain washed over by the Green Belt status. Please see below my further points as to why I object.

• I object to the changes to Policy P2 because they have not addressed many of the 32,000 objections made to the 2016 plan.
• I object to the new para (1) “The Metropolitan Green Belt will continue to be protected as shown designated on the Policies Map, against inappropriate development. In accordance with national planning policy, the construction of new development will be considered inappropriate and will not be permitted unless very special circumstances can be demonstrated.” The words “as shown designated on the Policies Map” should be deleted. The Policies Map has effectively ignored huge areas of Green Belt protection and the new para (1) is therefore a sham.
I object to the proposed change that Normandy settlement, Flexford settlement and Walden Cottages should be inset from the Green Belt due to the fact that:

- There is evidence in past planning appeals APP/Y3615/W/3002308, APP/Y3615/A/102140360 and APP/Y3615/A/10/2131590 that the land here contributes to the "openness" of the Green belt
- There is evidence in the Sustainability Appraisal para 10.4.7 that the agricultural land between the settlements is of BMV quality, exhibits 'openness' and contributes to the rural economy
- The land in and around the settlements of Normandy and Flexford contributes to views into and from the Surrey Hills AONB (Hog's Back)

Policy P2 fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it needs to be permanently protected. The Green Belt is intended to check the unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and other urban land.

Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital.

It is quite incorrect to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of land that may be removed from the Green Belt.

I object to the statement in the Draft Local Plan under Green Belt Policy P2 (4.3.13) which claims that 14 villages are “now inset from the Green Belt”. This statement is untrue as GBC is proposing to “inset” these village. No decision has been made by an Inspector, therefore the villages remain in the Green Belt.

I object to the changed “insetting” of 15 villages from the Green Belt, and at “infilling” 12 of the borough’s Green Belt villages.

I am concerned that settlement boundaries are to be hugely extended in many villages (including Send) and that infilling is also proposed outside the settlement boundaries of 11 further villages. This is completely unplanned and unmeasured development outside of the OAN.

**I SUPPORT** – Removal of site A46 & removal of site A47

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11076  Respondent: 15509057 / Richard Golding  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT. This policy states, “the general extent of the Green Belt has been retained.” This is a lie. There is a major reduction in the plan for Green Belt land between Guildford and the M25. The policy wording is tepid in support of the Metropolitan Green Belt even though the latter forms 89% of the borough and should be the cornerstone of all local planning policy. It is precious beyond the short-term demands of the present Government’s policy or a 15-year local plan. As noted under Policy S1 above, it is a solemn legacy to future generations – an asset and amenity that belongs as much to Londoners and the whole nation as to the people who live in it. It is an inalienable public good. Once gone it is gone forever. It is not the Council’s to give away even if central office is whispering in the ears of its councilors as to how great it would be for developers and such an advantage for them.

Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. Building on it involves high opportunity costs, including an irreversible loss of:

- Agricultural production
- Rural leisure and tourism amenities
- Water catchments
- Flood control
- Biodiversity
- Natural heritage
- A carbon sink for air pollution
- Room for public facilities such as parks and burial grounds
- Profitable film locations (e.g. Shere)
- Future economic potential such as mineral extraction (even fracking)
- Natural beauty, landmarks, opens space, rural views and sight lines
- Benefits to public health and wellbeing, physical and psychological (as well expressed in the NPPF)

As a matter of law, morality and national and local policy, these assets should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultations. (All though the government has recently seemed to opted for a back door policy to destroy the green belt) It is disreputable to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold. No one argues that we should sell 1.6% of the Crown jewels in order to build houses. I am not opposed to appropriate development in the Green Belt in Send, Send Marsh and Ripley. But I fail to see why a system of fair burden sharing of new development cannot be applied to the borough’s existing settlements in proportion to their size. This alternative would minimise the strain on infrastructure and maximise the chances of retaining the character of each settlement through gradual growth. It is reasonable to ask urban Guildford, with x times the population of semi-rural Send, Send Marsh or Ripley for instance, to accommodate x times the number of new homes over the plan period. Parish councils could be asked, and will no doubt be willing, to propose where their quota of houses should go. Most rural residents are reasonable people who, if not alienated by top-down planners, will support realistic numbers of new houses in their neighbourhoods. Unfortunately, this democratic, bottom-up approach has not been attempted. Instead, while developers flip and land-bank urban sites as a financial speculation, this plan will dump most new development on greenfield sites where building costs are lower, covering the Green Belt with dozens of housing estates that few residents want. 8,086 new houses are planned for the Green Belt but only 1,135 for Guildford urban area. This is disruptive, socially inequitable and unnecessary. It will not only destroy countryside but will also delay and dis incentive much-needed urban regeneration. The remarkable revival and repopulation of central London shows that building dormitory
satellite settlements is an out-of-date approach to planning. I particularly protest at the “insetting” of 14 villages from the Green Belt, and at “infilling” 12 of the borough’s Green Belt villages. I am deeply disturbed that settlement boundaries are to be extended in many villages including Send, Send Marsh and Ripley and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are “leggy” in outline, reflecting the effect of ribbon development (often along just one side of existing roads) permitted between the Wars. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost hell-bent on self-defeat.

I believe this policy is based on a flawed Green Belt and Countryside Study that, according to one Conservative Councillor, was irregularly commissioned by Council officers without the authority of Councillors. To “inset” two thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, although they would quickly destroy them if the proposed “insetting” and boundary extensions go ahead. This policy is wildly disproportionate in terms of any foreseeable development need (especially post-Brexit) and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Send is a good example of villages that ought to retain their Green Belt status. Send provides an important Green Belt buffer between Woking and Guildford. Yes, it is true that Send comprises old ribbon development but this should not mean it can be removed from the Green Belt so that Woking joins up to Guildford. The village and the countryside behind the A247 should all be protected.

I OBJECT to three particularly vulnerable areas of high quality amenity land being taken out of the Green Belt around Send which include:

1. The land behind the schools including playing fields and woodland.
2. The land to the right of Cartridge by the River Wey Navigation up to the new boundary fence with Vision Engineering.
3. Land to the left of Cartridge going up to the old depot on the Wey Navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11092  Respondent: 15509057 / Richard Golding  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the way this local plan totally disregards the protection the Green Belt gives to field and open spaces, it is cynical the way the council wish to create urban sprawl along the A3, (Policy A35, A43 and A25) this was one of the founding reason for creating the Green Belt in the first place, to stop urban sprawl along trunk roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11111  Respondent: 15568129 / Paul Cornford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Re. Paragraph 4.3.16 and Proposals Map Settlement Boundary Changes in East Horsley.
I OBJECT to the proposed boundary change to move the settlement boundary westwards from the houses on the west side of Kingston Avenue to the tree line running along the parish boundary on the west edge of of Kingston Meadows which would result in taking all of Kingston Meadows out of the green belt.

I have lived in my house since October 1979 and daily walked in the Meadows with my dogs. When GBC bought the Meadows, renaming them Kingston Meadows, we were assured by GBC that they would forever be used as recreation area for the residents of East Horsley. A large circle of Whitebeam trees was planted at the far (south) end of the Meadows and we were told the land there was to be used by locals to freely roam, picnic, exercise, walk children and dogs etc. Subsequently the children's play areas, tennis courts, football pitch and so on were built, all plainly for use by villagers.

No sound reasons have been given for the proposed extension of the boundary, which seems to be aimed solely at increasing the land available within the settlements for future additional development. Moving the green belt boundary westwards does not constitute an 'exceptional circumstance' under the NPPF rules and as such I believe this to be an invalid proposal.

Therefore I OBJECT TO THIS PROPOSED BOUNDARY CHANGE.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Please rethink your planning with a more environmentally sound concept. Plenty of homes are not occupied in the local area, why not work to use what already exists rather than create more housing monstrosities in a beautiful area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11128  Respondent: 15568993 / Jim Edgington  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The greenbelt should be protected for our children’s sake. There are plenty of smaller alternatives for housing, so let’s exhaust them first and deal with our traffic issues at the same time. Large estates on the edge of town are not the answer. If we really have to do so then please give the small builder and self-builder a chance and sell of the plots not hand over large developments to the greed of a few. I expect the borough council prefer it but the generic housing that we put up with is unsightly, dull, unimaginative and out balances profit over architectural innovation and inspiration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11142  Respondent: 15569377 / Catherine Hunter  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO all erosion of the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15963  Respondent: 15569377 / Catherine Hunter  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO all erosion of the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11169  Respondent: 15569505 / David Hawkey  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the removal of any villages from the Green Belt. P2

The Government has stated its commitment to the protection of Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11163  Respondent: 15569569 / Sethulekshmy Nair  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I wish to raise my objections to 2016 Guildford Borough Council's Draft Local Plan. My husband and I regularly visit East Horsley, where my son, his wife and young family live.

I go there weekly to look after two grandchildren. So not only do I know about the village they live in, but also the surrounding area which I love for its gorgeous, green countryside and quiet villages. This area is not only a true escape from the urban sprawl of London, but even from what you might perceive as the relative quiet suburbs of Camberley. Even if I don’t live there, changes will have a negative impact on me.

My main points of opposition to the Plan are:

Disregarding the Green Belt

The Surrey Hills areas of outstanding natural beauty must continue to be protected. It is too close to London to allow small chunks to be eaten away.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11218  Respondent: 15569889 / Avni Nicholls  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing to protest against the development on our green belt areas.

These are areas which prevent this small island from becoming one big concrete block, yes we do need to house people, however this cannot be done at the detrimental effect of destroying our countryside which is how the proposal intended will cause.

The overloaded services cannot sustain any more therefore more consideration needs to be taken to keep the area around London green. Affordable housing needs to be spread away from London to ensure other cities proper rather than placing a concentration to an already overload Capital.

Please think before making this monumental decision as there is no going back once it has been taken. Please don’t destroy our countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
**Comment ID:** PSLPP16/11244  **Respondent:** 15570145 / Owen Eszeki  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Policy P2 - Green Belt**

I strongly object to GBC considering building new developments of 2,000 houses in Green Belt. I object to Gosden Hill, Blackwell Farm and the former Wisley Airfield becoming new towns 'dumped' in the Green Belt for reasons of economy and convenience. I particularly object to the former Wisley Airfield being considered for a new town as this is slap bang in the middle of a green belt area and totally unsustainable as accepted by the recent Planning Committee who recently unanimously rejected a planning application on various NPPF grounds.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

**Attached documents:**

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**Comment ID:** PSLPP16/11249  **Respondent:** 15570209 / Emily Cross  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Policy P2 - Green Belt**

I strongly object to GBC considering building new developments of 2,000 houses in Green Belt. I object to Gosden Hill, Blackwell Farm and the former Wisley Airfield becoming new towns 'dumped' in the Green Belt for reasons of economy and convenience. I particularly object to the former Wisley Airfield being considered for a new town as this is slap bang in the middle of a green belt area and totally unsustainable as accepted by the recent Planning Committee who recently unanimously rejected a planning application on various NPPF grounds.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

**Attached documents:**

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**Comment ID:** PSLPP16/11256  **Respondent:** 15570273 / Barnaby Geib  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

**Attached documents:**
I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites
than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
There are some good aspects of the Proposed Submission Local Plan: strategy and sites 2016 but it is deeply flawed in critical areas, as identified by the Guildford Environmental forum of which I am a member. However, I write to you in a personal capacity as a concerned resident of the village of Chilworth and as an academic who works on the social and environmental impacts of encroachments on green spaces from extractive industry developments (which we already have now in Albury village) to inappropriate housing developments which in affectively privatise green spaces, public spaces, common land and green belt rural areas often for the gain of property ‘developers’ – this is compounded by the frequent rhetorical spin of providing for the ‘housing needs of the poor’.

In a society dominated by private property and private capital, where landlords are permitted to allow dwellings to sit unoccupied and where local councils’ first recourse is often to develop green spaces rather than brownfield sites or vacant sites previously run by commercial activities, the last thing our local borough needs is encroachment on that which makes it special and valuable. The Surrey Hills are an AONB with good reason, they are a beautiful biodiverse area which must be protected from development that will add yet more environmental degradation and CO2 emissions to our already endangered ecosystems and atmosphere. Let’s be clear; ALL development will do this despite the rhetoric of ‘sustainable development’. The villages of Shalford and Chilworth should not be taken out of the Green Belt. They provide vital ecological and social services, as Green Belt land, dimensions which would be ruined by further development of any kind.

The Proposed local plan is unsound as it fails to recognise the constraints placed on ‘the objectively assessed needs for housing’ by the Green Belt. It is quite clear in the government guidance on the NPPF that objectively assessed needs are constrained by designations such as the Green Belt. As GEF point out:

“The Framework is clear that local planning authorities should, through their Local Plans, meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole, or specific policies in the Framework indicate development should be restricted. Such policies include those relating to sites protected under the Birds and Habitats Directives, and/or designated as Sites of Special Scientific Interest; land designated as Green Belt ... ”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attended documents:

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Comment ID: PSLPP16/11389  Respondent: 15571169 / Pamela Bevington  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Green Belt and the villages within it should be protected and not destroyed by the existing flawed planning approach, and we respectfully request that new plans be prepared that actually take into account the comments made by both experts and the local population, who, after all, will have to live with the consequences of the decisions that might be made!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attended documents:

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Comment ID: PSLPP16/15279  Respondent: 15571201 / Zoe Dudgeon  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to not protecting the Green Belt (Policy P2)
This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.
In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11469  Respondent: 15571425 / Monika Neczaj  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

SITES I OBJECT TO ALL POLICIES INVOLVING BUILDING IN THE GREEN BELT:

- No “exceptional circumstances” shown, numbers excessive and the clearly expressed views of residents in previous consultations ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11477  Respondent: 15571521 / Sophie De Haast  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I was under the impression that the green belt only to be overturned in "exceptional circumstances". I feel that these exceptional circumstances need to be outlined clearly to the local community as I do not feel that this has been done. I also feel that the plan has not considered how the increase in population and traffic will affect the Sheepleas nature reserve and site of specific scientific interest. Should the proposed plan be accepted how would these concerns of mine be addressed?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11484  Respondent: 15571553 / Darren Carbine  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY P2 – Green Belt - I OBJECT.

This policy states, “the general extent of the Green Belt has been retained.” This is a blatant lie. The policy wording is lukewarm in support of the Metropolitan Green Belt even though the latter forms 89% of the borough. As noted under Policy S1 above, it is our provision to future generations. Once it’s gone it is gone forever. It is not the Council’s to give away. Policy P2 omits any assessment of the Green Belt’s value. Building on green belt causes an irreversible loss of:

- Agricultural production
- Rural leisure and tourism amenities
- Water catchment & Flood control
- Biodiversity and wildlife.
• Natural heritage
• Room for public facilities such as parks
• Profitable film locations (e.g. Shere, Wisley Airfield)
• Natural beauty, landmarks, open space, rural views and sight lines
• Benefits to public health and wellbeing, physical and psychological (as well expressed in the NPPF)

Specifically insetting 15 villages in the green belt (P2, 4.3.13) and assigning them to development that is “no longer considered inappropriate” (4.5.50) is a significant and unsustainable action that will have dire consequences for the character, infrastructure and future of all of these areas. See objections below in regards to Sites A36-41 in particular as a prime example. Indeed in the plan’s ‘reasoned justification’ regarding green belt, specifically section 4.3.18 it oddly states:

"Whilst most forms of development are considered inappropriate in the Green Belt, national planning policy lists certain exceptions which are not inappropriate. These are set out in paragraphs 89 and 90 of the National Planning Policy Framework. The exceptions listed include development such as new buildings for agriculture and forestry, and the redevelopment of previously developed land where it would not have a greater impact on the openness of the Green Belt."

The plan specifically outlines that the most forms of development are considered inappropriate in greenbelt land - removing (or insetting as you call it) these villages does not alter the fact that it is contravening in every principle the guidance of the NPFF paragraphs 89 and 90 and limited in-filling of land is not reasonable to the tune of over 600 properties and a 35% increase in the size of the village of West Horsley - it is no way limited (green belt or inset).

This is in direct breach of conservative party manifesto commitments prior to the general and council elections of 2015 and contrary to previous responses to public consultations and specific government guidance on green belt provision.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11495  Respondent: 15571553 / Darren Carbine  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Green Belt sites - I OBJECT

The identification and allocation of sites in this plan is with complete disregard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development, however, it does identify the principle of development and uses. This ignores the tens of thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. All Green Belt sites should be removed from the plan until “exceptional circumstances” for development are proven, as stipulated repeatedly in the NPPF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11490  Respondent: 15571585 / Bradley Vaughan  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
The Green Belt:

The National policy is clear in that it attaches great importance to the nature of the Green Belt.

The Plan does not show evidence of exceptional circumstances to justify why the Green Belt land should be used for strategic development.

Brownfield land needs more consideration, surely the decline in the need for retail space means that houses could be built in the town centre instead of more retail units, student accommodation should be constructed on campus even if higher rise accommodation is used.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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POLICY P2 – Green Belt

I object to this policy for the following reasons:

1. It does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local Planning policy. The Green Belt is not the Council’s to give away and once
it is gone, it is gone forever. Sacrificing areas of the Green Belt to a developer-influenced growth agenda is a betrayal of future generations and does not constitute sustainable development. Green Belt was last taken in the 2003 Plan and now it is again proposed to move the boundaries.

1. The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the Plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

1. Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

1. The Countryside Study was a simplistic exercise based on the erroneous principle that ranking Green Belt land would identify candidates for development. The Council has not carried out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently Planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

1. I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt (a term which neither the Plan nor the NPPF defines) and there is no need to inset them. I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling, and that infilling is also proposed outside the settlement boundaries of a further 11. In effect, each village will become a nucleus for further development. The NPPF’s other four tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development.

1. To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead. This policy is wildly disproportionate in terms of any foreseeable development need and has caused intense opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

1. Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” This is misleading. Since the Second World War, Guildford has been expanding to the north east, starting with the Bushy Hill estate in the 1950’s, then Merrow Park and Weybrook Park were built on around 100 hectares of Green Belt land in the 1980’s, and now 89 hectares of land from the adjacent Gosden Hill Farm is also to be taken out of the Green Belt.
Belt. This will connect to the proposed Garlick’s Arch development (30 hectares), also in the Green Belt, via several slip roads and feeder roads alongside the six-lane A3 (a further 4.5 hectares). If allowed, these two proposals will more than double the area of Green Belt land hitherto removed to enlarge Guildford’s NE suburbs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2625  Respondent: 15571617 / Bruce Garbutt  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

I object strongly that in all these cases the developments proposed in green belt will dwarf the nearby villages, totally changing the key attributes of the area.

Green belt was established to prevent urban sprawl with a clear policy that changes to the green belt should only be allowed in exceptional circumstances. It is well established that the wish to build houses is not accepted as an exceptional circumstance. The fact that such building is being proposed on several places in the Borough clearly demonstrates that this is being viewed as a normal practice rather than as an exceptional circumstance. Such wholesale annexation of green belt is clearly against the wishes of the majority of the local population, is counter to stated government policy and is counter to the NPPF, if not in itself actually unlawful.

I object that the Plan makes no attempt to show any exceptional circumstances to justify the removal of any sites from the Green Belt.

I object that the Plan is not sound. It appears to be based on a wholesale annexation of the green belt, a flawed if not illegal strategy, and is clearly not deliverable in the timescales of the plan when compared with the typical rate of development in the last 10-20 years.

I object that the revised Plan shows little or no evidence of the required “collective vision”. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land, this latest version has as much, if not more, building on the Green Belt and will bring increasing traffic congestion, pressure on other infrastructure, noise and pollution and a reduction in the quality of life of local residents.

There is a serious lack of detail on these critical matters which makes any collective vision impossible – for example, no plans for the A3 between the M25 and Guildford, a main artery which is already overloaded before any of the proposed thousands of additional houses are built. I object that the thousands of previous comments seem to have been largely ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11516  Respondent: 15571681 / Anne Martin  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to not protecting the Green Belt (Policy P2)
I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl which will again destroy the rural character of this area.
The Plan should develop the existing brownfield site at Burnt Common rather than developing Garlick’s Arch (A43).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: PSLPP16/11528  **Respondent:** 15571745 / Hazel Thompson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**I object to not protecting the Green Belt (Policy P2)**

I object to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch which is a greenbelt site, it would seem pertinent and sensible to develop brownfield sites wherever possible. The Burnt Common industrial estate just south of the Shell garage is keen to develop its land further and to make the most of the already partially developed land. Just two weeks before the start of the consultation the plan had been to develop this area, to which I’m sure there would have been much less public objection.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: PSLPP16/11572  **Respondent:** 15571937 / S Bennell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**I OBJECT to not protecting the Green Belt (Policy P2)**

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.
Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.
GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/11612  **Respondent:** 15572225 / Rob White  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object to building on the green belt as a matter of principle and the Hogs Back for ever ruining Guildford for future generations.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/11610  **Respondent:** 15572257 / Rosemary Cornford  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I OBJECT to the proposed boundary change to move the settlement boundary westwards from the houses on the west side of Kingston Avenue to the tree line running along the parish boundary on the west edge of of Kingston Meadows which would result in taking all of Kingston Meadows out of the green belt.

I have lived in my house since October 1979 and daily walked in the Meadows with my dogs. When GBC bought the Meadows, renaming them Kingston Meadows, we were assured by GBC that they would forever be used as recreation area for the residents of East Horsley. A large circle of Whitebeam trees was planted at the far (south) end of the Meadows and we were told the land there was to be used by locals to freely roam, picnic, exercise, walk children and dogs etc.

Subsequently the children's play areas, tennis courts, football pitch and so on were built, all plainly for use by villagers.

No sound reasons have been given for the proposed extension of the boundary, which seems to be aimed solely at increasing the land available within the settlements for future additional development. Moving the green belt boundary westwards does not constitute an 'exceptional circumstance' under the NPPF rules and as such I believe this to be an invalid proposal.

Therefore I OBJECT TO THIS PROPOSED BOUNDARY CHANGE.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/11613  **Respondent:** 15572353 / Dianne Kashel  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
<table>
<thead>
<tr>
<th>Comment ID</th>
<th>Respondent</th>
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<tbody>
<tr>
<td>PSLPP16/11618</td>
<td>15572641 / Susan Palmer</td>
<td></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td>I also object to the loss of green belt land for building purposes on the grounds that there has been a clear government directive that brownfield sites should be used first. Brown field sites should be used for housing not just for proposed business use. At the same time, having looked at the aerial views of Dunsfold park there is a lot more greenfield land than brown field land there and I hope that this would be preserved for environmental and recreational reasons. What changes (2016)/further amendments (2017) do you suggest should be made to the document? Attached documents:</td>
</tr>
<tr>
<td>PSLPP16/11621</td>
<td>15572737 / Bryony Purse</td>
<td></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td>I OBJECT to not protecting the Green Belt (Policy P2) I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever. The whole point of “Green Belt” is to provide a buffer from the continual pressure of urbanisation. We must protect these areas for the future, they were created for a reason and that principle is need now more than ever. What changes (2016)/further amendments (2017) do you suggest should be made to the document? Attached documents:</td>
</tr>
<tr>
<td>PSLPP16/17197</td>
<td>15573793 / Alan Ridley</td>
<td></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td>I am writing to register my objection to the removal of the greenbelt protection from Chilworth and Shalford and Peasmarsh. This would allow the Guildford area to become a sprawling suburban development and would not be good for the rural environment. This is some of the most scenic country and well farmed, productive and used land. Allowing building in this area would be an end to this What changes (2016)/further amendments (2017) do you suggest should be made to the document? Attached documents:</td>
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<tr>
<td>Comment ID: PSLPP16/11663</td>
<td>Respondent: 15573921 / Carolyne Jackson</td>
<td>Agent:</td>
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<td>I object most strongly to the proposed local plan submission by Guildford Borough because:</td>
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<td>I do not believe places (in this instance villages Ripley, Send and Clandon and sites at Wisley Airfield and Garlick's Arch) should be removed from Green Belts simply to build housing and industrial estates. Green Belts should be protected, otherwise eventually there will be no open spaces left for us to enjoy.</td>
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<td>I object to site A25 Gosden Hill Farm - massive overdevelopment of 2000 homes in the green belt</td>
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<td>I object to site A35 Wisley Airfield - 2000 homes that are totally inappropriate and unsustainable development in the Green Belt.</td>
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<td>I object to any &quot;in- setting (ie removal) of any villages from the Green Belt</td>
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<td>There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt &amp; Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.</td>
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<td>Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.</td>
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Attached documents:

Comment ID: PSLPP16/11751  Respondent: 15574433 / Irene Purse  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing to register my objection to the removal of the greenbelt protection from Chilworth and Shalford and Peasmarsh.
This would allow the Guildford area to become a sprawling suburban development and would not be good for the rural environment.
This is some of the most scenic country and well farmed, productive and used land. Allowing building in this area would be an end to this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11758  Respondent: 15574497 / Ann Murray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Send Village being removed from the Green Belt. Local Councillors and Central Government made a clear election promise to protect the Green Belt. This would break that promise. In future there would be nothing to stop developers taking advantage of this. The Green Belt prevents Guildford and Woking becoming one conurbation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/466  Respondent: 15574497 / Ann Murray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Green Belt, Policy 2 at paragraph 4.3.15

I object to the proposal to inset Send Business Park from the Green Belt because this small development is in an area of outstanding countryside next to the River Wey. To further develop here would take more land out of the Green Belt. Tannery lane is a narrow, winding lane causing restricted access for vehicles in both directions.

The original Plan proposed 485 houses and 2 traveller pitches. The new proposals have increased the number of houses to 500, despite concerns from local people. Send has now been allocated 2 traveller pitches and 8 show people plots - a total of 10. Gosden Hill and Wisley - developments of 1500 houses - have only been allocated 8 each.

Recently I heard Mrs May in Parliament reaffirming that the Government is protecting the Green Belt! These plans do not support this statement.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11769  Respondent: 15574657 / James Goldsworthy  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing to register my objection to the removal of the greenbelt protection from Chilworth and Shalford and Peasmarsh.

This would allow the Guildford area to become a sprawling suburban development and would not be good for the rural environment.

This is some of the most scenic country and well farmed, productive and used land. Allowing building in this area would be an end to this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11784  Respondent: 15574849 / John Heaton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing in regards to the local plan in which Guildford Borough Council is proposing to remove Green Belt protection from a number of villages around the Guildford area, which includes the area where I live, Chilworth.

Not only would I say this is a betrayal of environmental protection that makes this area of the South East so special it is also nonsensical in terms of the infrastructure in this area.

Having the misfortune to have to travel from New Road in Chilworth to Guildford on a regular basis using the A248 and A281 I can tell you that this journey of roughly 3 miles can already take between 20 and 40 mins depending on which time of day you happen to undertake the journey. The thought of adding new housing around Chilworth, Shalford and other local villages will make this situation completely untenable. Add in destroying green belt land which we will never get back then I ask you to reconsider the local plan.

I appreciate the need for new housing and this isn't small minded 'nimby-ism' but there must be better areas with the necessary infrastructure in place (or green field sites where these can be added) than a huddle of already over populated villages with 1 road into Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11786  Respondent: 15574881 / Megan Bryan  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing in regards to the local plan in which Guildford Borough Council is proposing to remove Green Belt protection from a number of villages around the Guildford area, which includes the area where I live, Chilworth.

Not only would I say this is a betrayal of environmental protection that makes this area of the South East so special it is also nonsensical in terms of the infrastructure in this area.

Having the misfortune to have to travel from New Road in Chilworth to Guildford on a regular basis using the A248 and A281 I can tell you that this journey of roughly 3 miles can already take between 20 and 40 mins depending on which time of day you happen to undertake the journey. The thought of adding new housing around Chilworth, Shalford and other local villages will make this situation completely untenable. Add in destroying green belt land which we will never get back then I ask you to reconsider the local plan.

I appreciate the need for new housing and this isn't small minded 'nimby-ism' but there must be better areas with the necessary infrastructure in place (or green field sites where these can be added) than a huddle of already over populated villages with 1 road into Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The proposal to remove villages such as Chilworth, Peasmarsh etc from the greenbelt is unacceptable. These areas are areas of natural beauty and are what makes this area of the surrey Hills such an attractive area to live in, cycle in, kids to grow up etc. I strenuously object to Chilworth being removed and it should stay within the greenbelt and as an area of outstanding beauty.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11885  Respondent: 15574881 / Megan Bryan  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

** I object to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

This will cause more congestion to the villages of Ripley, Send and Clandon, which have poor condition narrow roads and no footpaths, which are dangerous. More houses will increase this danger and unsustainable volumes of traffic

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11799  Respondent: 15574945 / Tim Crook  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The proposal to remove villages such as Chilworth, Peasmarsh etc from the greenbelt is unacceptable. These areas are areas of natural beauty and are what makes this area of the surrey Hills such an attractive area to live in, cycle in, kids to grow up etc. I strenuously object to Chilworth being removed and it should stay within the greenbelt and as an area of outstanding beauty.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I would like to register my objection to the removal of the Green Belt protection from several local villages. Removal of this protection would allow development in an area which is already very congested both mornings and evenings.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11819  Respondent: 15575009 / Tony Redknap  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to not protecting the Green Belt (Policy P2)

I object to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the Green Belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11830  Respondent: 15575041 / Marie York  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to all erosion of the Green Belt.

I object to any "in-setting"(i.e. removal) of any villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11845  Respondent: 15575137 / Charlotte Procter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I am writing this email in order to object to the future plans for Send. Please can this email be shown to the Planning Inspector and please can you confirm that you have received this email. See below for my list of objections:

- I OBJECT to Send Village being removed from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11868  Respondent: 15575617 / Pete Killingley  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Send Village being removed from the Green Belt. It is utterly unnecessary to remove it from the Green Belt, particularly given the clear election promises to protect it. Without Send being part of the Green Belt, it will be absorbed into Woking and Guildford and the character of the village will be further destroyed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Comment ID: PSLPP16/11870  Respondent: 15575649 / India P Donnell  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

My biggest concern is to remove Horsley from the Greenbelt. If you took the time to visit the village you would appreciate that Horsley is totally Greenbelt, surrounded by fields, farms, churches, local history. There is no exceptional case being made for it to be removed and thus should be declined.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Comment ID: PSLPP16/11871  Respondent: 15575681 / John Francis  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the not protecting the Green Belt (Policy P2)

I strongly object to removing the villages of Ripley, Clandon and Send from the Green Belt.

In addition the sites of Wisley Airfield and Garlicks Arch must not be removed as their development would wreck the local area creating an urban rather than a green environment. As required by the National Planning Policy there are no exceptional circumstances for the above sites being removed from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/11877  Respondent: 15575713 / Sophie Killingley  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Send Village being removed from the Green Belt. It is utterly unnecessary to remove it from the Green Belt, particularly given the clear election promises to protect it. Without Send being part of the Green Belt, it will be absorbed into Woking and Guildford and the character of the village will be further destroyed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11881  Respondent: 15575937 / Emily Carr  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The proposal to remove villages such as Chilworth, Peasmarsh etc from the greenbelt is unacceptable. These areas are areas of natural beauty and are what makes this area of the surrey Hills such an attractive area to live in, cycle in, kids to grow up etc. I strenuously object to Chilworth being removed and it should stay within the greembelt and as an area of outstanding beauty.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11898  Respondent: 15576641 / Hilary Thomas  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I strongly object to the Guildford Proposed Submission Plan (June 2016) to build on Green Belt land.

Apart from the impact of so many houses on the local environment, the Green Belt is the lungs of the country, providing not only clean air but also open spaces in which people can improve/maintain a healthy lifestyle by getting out of door in an enjoyable and therapeutic environment.

I object to the removal of parts of Ripley, Send, Clandon from Green Belt, together with Garlick’s Arch, which would result in Urban Sprawl as well as denying people of the benefits of the Green Belt. A far as development of Wisley Airfield is concerned, the impact on traffic on an already crowded road system would be particularly dire. Generally the impact of 13,000 houses in this area would be huge and since households now generally have 2 cars, the impact on traffic and pollution would be detrimental to health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>I object to all erosion of the green belt p2</td>
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<td>I am saddened by the proposed plans. This is because I know my experience of childhood may not be experienced by other children again in this village. To propose such a large number of houses is ridiculous and to remove Horsley from the green belt is absurd!</td>
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<td>I strongly object to all erosion of the Green Belt and the removal of any villages from it.</td>
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<td>No satisfactory ‘exceptional circumstances’ have been given for the proposal to remove the Horsleys from the Green Belt. The removal of much village area from the Green Belt is without explanation or due consideration. I can see no due consideration given to Horsley.</td>
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<td>Comment ID: PSLPP16/11976</td>
<td>Respondent: 15578465 / Jan Ellis</td>
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<td>I oppose unjustified Green Belt development. Brownfield opportunities are being ignored – we need homes in the centre (not 40% more shops), much more accommodation on campus for students, and homes for the elderly to free up family houses.</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>3. There should be NO BUILDING ON THE GREENBELT without local resident agreement. This greenbelt destruction is robbing the next generation of their heritage and driving up pollution and traffic.</td>
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<th>Comment ID: PSLPP16/12013</th>
<th>Respondent: 15578849 / Jo Kulp</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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<td>I am writing to object to the new local plan the Guildford Borough Council is suggesting to propose removing green belt protection from the villages of Chilworth and Shalford. These villages are in areas of countryside of outstanding natural beauty that locals and visitors alike enjoy spending time in, it is vital to our wellbeing, and it would be a travesty to remove the green belt protection from this land. I strongly object to the plan.</td>
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<th>Comment ID: PSLPP16/12018</th>
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The ruling party on GBC has acted dishonestly and dishonourably over the Green Belt. Having promoted its protection at every election for decades and made the same pledge last year, it now claims it has ‘listened’ to the people of Guildford, yet produces a plan barely different from the 2014 version but which includes widespread development - TWO-THIRDS of which is on Green Belt land. This is contrary to their own policies, those of central Government and those of the NPPF. The Council even has the gall to include in its Plan the sentence: ‘We will continue to protect the Green Belt’!

The new Plan also includes removing about 15 villages in the borough from the Green Belt and changing the Green Belt boundaries. There is no justification for this except to facilitate future development. Removing Green Belt status from villages will leave them vulnerable to excessive development and result in the merging of villages causing an ‘urban’ sprawl, exactly the outcome the Green Belt was designed to protect.

At the last General Election, the Tories’ manifesto promised to protect the Green Belt and to retain the rules governing it. These state that development can only be allowed on Green Belt land in exceptional circumstances and that housing need does not count as sufficient reason.

They also say that Green Belt boundaries cannot be changed or moved, again except in exceptional circumstances. GBC have not given a single reason why there are special circumstances for sacrificing so much Green Belt land. Why do they think that the rules do not apply to GBC, especially when only a few years ago they made a legal challenge to protect the borough’s Green Belt?

The Plan’s totally unacceptable assault on the Green Belt will, in effect, destroy the concept of protection throughout the borough and beyond. It must be resisted if we are to retain the sort of countryside that the British know and love - and want retained.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to an alteration in the Green Belt Boundary, such that several local villages currently inside the Green Belt will now fall outside, and will inevitably be developed into 'suburbia' in the years to come.

Maintaining the Green Belt in the UK is absolutely crucial; whilst I understand that the population is increasing, and therefore space needs to be found to build new houses, I absolutely disagree that this should be done by sacrificing Green Belt. Green land is so important for the health and wellbeing of the population; and vital habitat for flora and fauna. Once land has been taken out of the Green Belt, it is inevitable that it will become fully occupied by buildings in years to come - this is something we can never take back. We moved to Horsley because we wanted our children to be able to enjoy the space and countryside; we have many friends who, for work reasons, need to live in more urban areas. But they still make the effort to travel out to the Green Belt during weekends and holidays, as they also value this space for their families. This area of green belt also attracts visitors and tourists from around the UK and abroad - it would totally lose this appeal if it were to be gradually urbanised. I strongly feel that reducing the size of the Green Belt is an extremely short-sighted and ill thought out solution to the housing problem, and should be avoided.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I OBJECT to not protecting the Green Belt (Policy P2)

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The whole point of “Green Belt” is to provide a buffer from the continual pressure of urbanisation. We must protect these areas for the future, they were created for a reason and that principle is need now more than ever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12099  Respondent: 15579649 / Peter E May   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12113  Respondent: 15579809 / Julie Pilkington   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Loss of Green Belt – Once Green Belt areas have been lost they can never be recovered. Why haven’t Brown Fill sites been considered first?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12124  Respondent: 15579937 / Mike Chard   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to removal of the horsleys from the green belt and I feel exceptional circumstances have not been demonstrated. 

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>15581665 / Laura Daboo</th>
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I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development,
claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

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Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12265  Respondent: 15582017 / Valerie Lewis  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object that 15 villages are threatened. GBC seems intent on the destruction of villages and the creation of suburbs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12297  Respondent: 15582337 / Peter Hill  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

i object any removal of any villages from the green belt

i object to all erosion of green belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16417  Respondent: 15582337 / Peter Hill  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to any erosion of the Green Belt. It was put in place to prevent developments merging together and causing loss of identity of villages and settlements. These proposed developments will cause Burpham, Clandon, Send, Ripley, Wisley and Ockham to be merged into one massive housing estate with thousands of extra people and their vehicles clogging our roads, overwhelming our health services, schools and local amenities.

I object to any "in-setting" (i.e. removal) of any villages from the protection of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPP16/12339  **Respondent:** 15582593 / Dermot McMullan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. Sacrificing areas of the Green Belt does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

This policy is wildly disproportionate in terms of any foreseeable development need. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/12360  **Respondent:** 15582817 / Karsten Kollov  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Green Belt is protection in law and there are no special circumstances why this should change in any way. Hands off the nations Green belt!!!!

Please confirm that you have received this communication of my objections and please ensure that these are shown to the planning inspector who is taking the decision

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12369  Respondent: 15582913 / Nigel Pink  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO all erosion of the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12401  Respondent: 15583169 / Poul Jensen  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing
exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/12440  Respondent: 15583361 / Pat Moxon  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to all erosion of the Green Belt
I object to any 'in-setting' of any villages from the green belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12438  Respondent: 15583393 / Jane Buckingham  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- Section 4 - POLICY P2 – GREEN BELT (Objection)
  - Objection in whole to the insetting of Effingham, Ripley, Horsleys.
    - A legally binding Act of Parliament created the green belt as a permanent feature. We strongly question the legality of such a move.
    - The draft plan itself restates green belt aims such as keeping the land “permanently open”. We are aghast as to how Guildford Borough Council determined that these small villages, surrounded in and out by greenery and open land, do not fit, or warrant, this description and protection. Have the assessors actually visited the locations, or simply decided the outer edges of urban Guildford are ripe to be sacrificed to developers, being relatively far away from the council hub itself? Today, Effingham is a small village of only c1000 homes in green belt.
    - The plan confirms national policy in that, “Exceptional circumstances are required to amend green belt boundaries” in 4.3.16 yet the plan does not prove exceptional circumstances exist. It has been debated and confirmed in the UK parliament in recent years that housing need alone does not represent exceptional circumstances.
    - This proposal to inset in 4.3.13 must be reversed. It is clearly driven by unsubstantiated and unrestricted housing targets and has not taken into account infrastructure limitations and flooding concerns. Effingham in particular has severe infrastructure limitations, frequent flooding and does not even have a doctor’s surgery. Insetting the village will leave it prey to speculative, inappropriate development and encroachment at odds with the NPPF and the local community’s desires (localism) and capability to manage such over-development. The nature of the village provides few options for improvements via widening or new roads, it is irresponsible to propose to inset it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16204  Respondent: 15583457 / Claire Parker  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing in objection to the Proposed Submission Local Plan: Strategies and Sites June 2016. I currently reside in West Horsley and am totally against the plans for removing the village from the green belt which is against the statement
in Policy P2 stating "We will continue to protect the Metropolitan Green Belt against inappropriate development" One of the reasons I moved to the village is the fact that we are surrounded by nature and can escape the craziness of the city.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/12441  **Respondent:** 15583521 / Richard Moxon  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to all erosion of the Green Belt I object to any 'in-setting' of any villages from the green belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp17/1343  **Respondent:** 15583553 / Malcolm Murray  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I Object to the Proposal to Inset Send Business Park from the Green Belt

There is no benefit to the community from changing from the present status of the business park which has evolved over many years.

By changing the status it would be a toehold for possible future development plans and clearly this is the only reason the Council is including it in the plan.

The problems with traffic movement n Tannery Lane and the A247 junction have already been highlighted in the objections over the Clockbarn Nursery above, also apply to this site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/12448  **Respondent:** 15583585 / Josephine Rooke  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

** I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)
There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

** I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT TO all erosion of the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to not protecting the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to not protecting the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object to not protecting the Green Belt (Policy P2)
   I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

   The Plan should develop the existing brownfield site at Burnt Common rather than developing Garlick’s Arch (A43).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
As a reminder:

The National Planning Policy Framework (NPPF) requires that new residential development MUST respect the character and density of housing in the area and be limited by the availability of infrastructure and local facilities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/12516</th>
<th>Respondent: 15583937 / Brian Astley</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>

I object to the 2016 draft local plan on the following grounds
- all erosion of the Green Belt.
- any "in-setting" (i.e. removal) of any villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/12518</th>
<th>Respondent: 15583969 / Tim Key</th>
<th>Agent:</th>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>

I live at [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] and would like to object to aspects of the proposed local plan for Guildford.

In particular, I object to the proposal to remove East Horsley from the Green Belt area, believing that the exceptional circumstances required for such an action have not been met.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/12521</th>
<th>Respondent: 15584001 / Lorna Thompson</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.
Both the A3 and M25 need improvements before any developments commence. This is clearly not going to happen in the timescales of the plan, so the proposed developments at Wisley Airfield (A35), Garlicks Arch (A43) and Gosden Hill (A25) should NOT take place.

Please record these objections individually against the relevant sections of the plan and ensure that they are submitted to the Planning Inspectorate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/527  Respondent: 15584033 / Andrew Hutton  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Green Belt**

This issue causes the most anger.

I object to the statement in the Draft Local Plan under GreenBelt Policy P2 (4.3.13) which claims that West Horsley and a further list of 13 villages are “now inset from the Green Belt”.

This statement is untrue as GBC is proposing to “inset” these village. No decision has been made by an Inspector, therefore the villages remain, as instructed, under the NPPF regulations, in the Green Belt!

The Conservative Party manifesto 2017 states “It means maintaining the existing strong protection on designated land, like the Green Belt…”

Government statements in the Housing White Paper 7 Feb 2017, claim that existing protection for the Green Belt would remain unchanged and emphasised that authorities should amend Green Belt boundaries only when they had examined fully all other reasonable options for meeting their identified development requirements.

GBC has failed to propose sufficient brownfield sites and has gone ahead with Green Belt development proposals against all reason and opposition. GBC has allowed a “Pop-up village” of ugly portacabin retail shops, which was a total failure at Christmas, to be re-instated on a site, eminently suitable for development close to the town centre. They also allowed Waitrose to waste another town centre site to use as a car-park, rather than building one below ground with flats above. Their intention, as suggested in every version of the draft Local Plan, is to over-develop small villages, place large developments on sensitive sites and ignore the brownfield opportunities.

I object to ANY villages being “inset” from the Green Belt.

I object to any major development being encouraged on farmland, open spaces or obtrusive sites.

Blackwell Farm should not be developed at all. There are many reasons for this including archaeology and wild-life, but I mainly object because houses on the slopes of the Hogs Back would be a blot on the landscape. A roundabout on the A31, leading to the site, with its associated street lighting would be visible and intrusive for at least 20 miles to the North and South.

I object to the proposals for over 2000 houses at Wisley. Several applications for this development have been turned down but the GBC Executive refuses to listen to any objection and seems determined to go ahead with this development, even after all the Councillors rejected the last application. The site was returned to the Draft Local Plan within days of this decision. Five storey flats would be an eyesore from all points of the Downs. The site is very visible as it is on a dome of land. At present, the airstrip, which should have been removed after its war-time requisitioning, is not visible among the green fields.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12573  Respondent: 15584161 / Alexandra Elson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18644  Respondent: 15584161 / Alexandra Elson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY P2
I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.
Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/12586  **Respondent:** 15584481 / Jeremy Hamilton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **Sound?** ( ), **Legally Compliant?** ( )

I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/12618  **Respondent:** 15584641 / Miriam Gilkerson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **Sound?** ( ), **Legally Compliant?** ( )

I object to not protecting the Green Belt (Policy P2)

In your 'About Guildford' publication you specifically mention not removing areas from the green belt and yet this is exactly what you are planning.

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)
There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15664  Respondent: 15584641 / Miriam Gilkerson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- I object to any ‘in-setting’ that removes villages from the Green Belt

As a resident of 40+ years, growing up in Wisley and now raising my family in Burnt Common, I have greatly appreciated the beauty and quality of life being in the Green Belt affords. It is deeply disappointing that those that should be seeking to protect village life and respecting the Green Belt believe that adding huge numbers of houses and traffic will help. I therefore object wholeheartedly to this local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12635  Respondent: 15584833 / Maria Fort  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

. I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12639  Respondent: 15584865 / T Street  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

'We object

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12643  Respondent: 15584897 / J Street  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

'We object

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12650  Respondent: 15584961 / Helen Meredith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY P2

I object to this Policy on the grounds that this is not protecting the Green Belt (Policy P2). This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt. In addition other changes within the plan, such as the change to the village settlement area within West Clandon and other villages will result in other pieces of Green Belt land (such as land at Barn End, The Street, West Clandon) being developed for housing in addition to the sites allocated within the proposed plan.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.
The Countryside Study commissioned by Guildford Borough Council was a simplistic tick box exercise. It failed to carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt sites proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether they should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an ‘exceptional circumstance’ nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned.

I note that the Summer 2016 edition of “About Guildford” (published by the Council) on page 5 states that “… the Plan rejects any schemes that would have a detrimental impact on the Green Belt.” This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I believe that the consultation process was flawed and ineffective because of this.

I object extremely strongly to the “insetting” of 14 villages from the Green Belt. These villages contribute to the openness of the Green Belt and there is no need to inset them. To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and village settlement boundary extensions go ahead.

I object extremely strongly to the wholesale extension to the settlement boundaries in many villages which is a change made since the 2014 version of the Plan and in relation to which there has been no consultation. This change will allow infilling in the Green Belt. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development. For example, Guildford Borough Planning Department are already well aware of multiple previous applications for planning permission for a large number of houses made by Philip Christian of Stonehaven homes on a 5 acre strip of Green Belt at Barn End, The Street, West Clandon. Careful examination of the village settlement area of West Clandon shows that the existing West Clandon village settlement area had been very carefully drawn around the boundaries of this piece of Green Belt so as to protect this from development. The land is of environmental significance as this provides a green wildlife corridor adjacent to protected woodland. In the past every application has been refused locally and the decisions have been upheld on Appeal but that position will be impossible to sustain if this land is included in the proposed new settlement boundary for West Clandon I live next to this piece of land and have seen Surveyors working on the site in the last week presumably preparing an application for planning permission to develop the site wholesale if the draft Local Plan comes into force.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as it is factually incorrect.

In addition I object to the proposals to remove from the Green Belt Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the Green Belt they will be lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site. Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Comment ID: PSLPP16/12672</th>
<th>Respondent: 15585057 / Alison Warwick</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>I object to all in setting i.e removal of villages from the green belt.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>The Green Belt also provides a 'fire barrier' at the northern end of Glaziers lane and the hamlet of Flexford to avoid further urbanisation of these habitat-rich and open areas between towns already encroaching.</td>
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<td>I hope that GBC will liaise with other councils to ensure that the issues do not merely move a few miles to a different location along this corridor. Rural communities already have to jostle amongst the competing demands of housing, healthcare and traffic. The Blackwater Relief Road may have relieved the Blackwater Valley but the knock-on effect along the Tongham/Ash/Normandy areas must be taken in to consideration.</td>
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<td>Thank you for your considerations so far. This area really plays an important role.</td>
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<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>I object to the proposed development on greenbelt.</td>
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<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>I OBJECT TO – The removal of any villages from the Green Belt</td>
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<tr>
<td>PSLPP16/12724</td>
<td>15585441 / Laurie Will</td>
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3. **I OBJECT to not protecting the Green Belt (Policy P2)**

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/12761</th>
<th>Respondent: 15585601 / Sophie Corstin</th>
<th>Agent:</th>
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<td><strong>Document:</strong></td>
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<td><strong>1. POLICY P2</strong></td>
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<td>The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt</td>
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<td>Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.</td>
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<td>The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites</td>
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than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages.

In particular I OBJECT to the settlement boundary put round East Clandon with no reference to the residents or the Parish Council.

Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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** I object to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

This will cause more congestion to the villages of Ripley, Send and Clandon, which have poor condition narrow roads and no footpaths, which are dangerous. More houses will increase this danger and unsustainable volumes of traffic

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object removing Send Business Park from the Green Belt (4.3.15).

Send Business park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for it’s insetting (removal) from the Green Belt, and indeed GBC have not even attempted one. Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
**Comment ID:** PSLPP16/12823  **Respondent:** 15585889 / Tony Rodnight  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

unjustified Green Belt development

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/12921  **Respondent:** 15586017 / C Maslin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**POLICY P2 GREEN BELT**

I object to Policy P2 green belt

This policy states, ‘the general extent of the Green Belt has been retained.’ This is a misleading statement.

The policy wording is weak in support of the Metropolitan Green Belt even though the latter forms 89% of the borough and should be the cornerstone of all local planning policy. It is precious beyond the short-term demands of the present Government’s policy or a 15-year local plan. As noted under Policy S1 above, it is a solemn legacy to future generations – an asset and amenity that belongs as much to Londoners and the whole nation as to the people who live in it. Once gone it is gone forever. It is not the Council’s to give away.

Policy P2 completely fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it has been around for a long time and it needs to be permanently protected. It was actually established in a local act of parliament in Guildford under the London Home Counties (Green Belt) Act 1938 and subsequently in the 1944 Greater London Plan to contain the outward sprawl of London. The boundaries of the Green Belt through Guildford Borough were later defined in the 1987 Local Plan, forming part of a 19-24km concentric belt around London. The Green Belt is intended to check the unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and other urban land. The principles of the Green Belt designation were outlined within Planning Policy Guidance 2: Green Belts (PPG2) and are found within the National Planning Policy Framework (NPPF). The Metropolitan Green Belt is an exemplar of good planning and the envy of planners throughout the world.

Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. Building on it involves high opportunity costs, including an irreversible loss of:

1. Agricultural production
2. Rural leisure and tourism amenities
3. Water catchment
4. Flood control
5. Biodiversity
6. Natural heritage
7. A carbon sink for air pollution
8. Room for public facilities such as parks and burial grounds
9. Profitable film locations (e.g. Shere)
10. Future economic potential such as mineral extraction (even fracking)
11. Natural beauty, landmarks, open space, rural views and sight lines
12. Benefits to public health and wellbeing, physical and psychological (as well expressed in the NPPF)

As a matter of law and national and local policy, these assets should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultations.

It is quite incorrect to argue, as the Council do, that the plan would involve the loss of ‘only’ 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no ‘acceptable’ percentage (in the NPPF or anywhere else) of Green Belt that may be sold.

I object to the ‘insetting’ of 14 villages from the Green Belt. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost hell bent on self-defeat.

I believe this policy is based on a flawed Green Belt and Countryside Study that, according to one Conservative Councillor, was irregularly commissioned by Council officers without the authority of Councillors.

To ‘inset’ two thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, although they would quickly destroy them if the proposed ‘insetting’ and boundary extensions go ahead.

I object to the removal of over 400 hectares of Green Belt land in and around Blackwell Farm to facilitate further development of Surrey Research Park and for 1800 homes. Over 60 hectares were removed from Green Belt 12 years ago for the same developer (Surrey University) who has yet to fulfill their planning obligations. This valuable land has been squandered with over 17 acres of surface car parking and as one of the key features of Green belt is its ‘permanence’ this second request for yet more Green Belt land to be released in such a short space of time, with all the outstanding issues that remain makes this all the more objectionable.

Furthermore I object on grounds of the impact this development will have in terms of congestion on our highways, these issues have been highlighted under ‘infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
In summary it appears to me that the proposals for new homes in the Horsleys and at Wisley Airfield have been poorly thought out with little regard for the Metropolitan Green Belt rules. There has been a complete failure to consider the impact on the infrastructure and environment across a wide spread area, the strain on local facilities and the fact that the proposed developments are totally out of character for the rural area of this part of Surrey. I would therefore urge Guildford Borough Council not to countenance any development at the Wisley Airfield site and to considerably reduce the planned housing increase in the Horsleys.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not adress Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
“The main aim of Green Belt is to prevent urban sprawl by keeping land permanently open”. This policy need go no further. However, the proposals in the Plan make significant inroads into the Green Belt in direct contravention of the NPPF. The NPPF states that planning permission should only be granted in very special circumstances.

Cumulatively, the housing need is becoming critical. But it is not very special. These circumstances have crept up upon us over a period of decades and it is only the magnitude of the problem which is causing the current anxiety. However, this anxiety can be reduced significantly by a realistic calculation of the ONA, a better assessment of need and land availability and a stringent application of the affordable housing principle which does not allow developers to change their ‘offer’ half way through.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12904  Respondent: 15587169 / Sylvia Denison  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Comments/Objections on Draft Local Plan

(Ripley, Send, Send Marsh and Burnt Common)

I wish to register my comments and objections on the above proposals as follows:

Green Belt Issues

I object to local villages within the above area being removed from the Green Belt. Send has grown over the years and I feel is at its capacity now. It is also a popular through route for traffic which frequently comes to a standstill at peak times for people making necessary journeys to work and schools. Some of the roads in the village are too narrow for current traffic flow and will therefore be unable to carry the inevitable additional vehicles.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12983  Respondent: 15587233 / Jane Clark  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

The Plan should develop the existing brownfield site at Burnt Common rather than developing Garlick’s Arch (A43).
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13016  Respondent: 15587361 / Aileen Creegan  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13046  Respondent: 15587521 / Paul French  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to your Local Plan because of the way it totally ignores Green Belt constraints.

Brownfield land should be used for building before any green fields. Housing numbers must reflect real local need not developers’ wishes and your proposed housing numbers are considered far too high by everyone who has looked at them closely, except GL Hearn’s sub-contractors who are keeping their working methods a secret. It would seem that not even you know how they were arrived at. The Metropolitan Green Belt was conceived for the benefit of all and must not be ignored or considered an easy target for building land.

You campaigned to protect the Green Belt prior to your election to the council and you should now be ashamed of yourselves for backing this iniquitous Local Plan. There are so many procedural and planning errors by GBC and its consultants that this plan must be rethought. All protected sites and nature reserves must be conserved, the Green Belt must be maintained and the wishes of your electorate must be listened to. Remember you are public servants there to serve your constituents and not to bully us into accepting this appalling Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/13059</th>
<th>Respondent: 15587617 / Anne Forss</th>
<th>Agent:</th>
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<tr>
<td>I wish to register my objection to the proposed removal of Chilworth from the green belt, having lived in the village for over 20 years and enjoyed the surrounding countryside.</td>
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<td>I do understand there is a need for considered development to allow families to live in the area but this should not be at the expense of building on green belt areas which is then lost forever.</td>
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<th>Comment ID: PSLPP16/13062</th>
<th>Respondent: 15587745 / Paul Gates</th>
<th>Agent:</th>
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<td>This e.mail is to register my DISAPROVAL to the proposed 14,000 NEW HOMES under the revised Draft Local plan.</td>
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<td>These include but are not limited to ‘large strategic sites’ such as Garlick’s Arch, Gosden Hill/Clandon and Wisley.</td>
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<td>It is criminal to even consider the re-listing of our local villages as ‘inset’ ie: no longer under the ‘Green Belt’ structure.</td>
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<th>Comment ID: PSLPP16/13099</th>
<th>Respondent: 15587905 / Clare Claxton</th>
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<td>I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)</td>
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<tr>
<td>There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.</td>
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<th>Comment ID: PSLPP16/13132</th>
<th>Respondent: 15588001 / Mary Jane Godfrey</th>
<th>Agent:</th>
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<td>Comment ID: PSLPP16/13143</td>
<td>Respondent: 15588065 / Nick Claxton</td>
<td>Agent:</td>
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<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:
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<th>Comment ID: PSLPP16/13161</th>
<th>Respondent: 15588673 / Joy Davis</th>
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There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:
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<tr>
<th>Comment ID: PSLPP16/13173</th>
<th>Respondent: 15588801 / Elizabeth Adams</th>
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<td>Document:</td>
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The Green Belt is precious, and encroaching that will be detrimental to the health and wellbeing of communities in this area
What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:
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**POLICY P2: Green Belt**

This policy states that GBC “will continue to protect the Metropolitan Green Belt”.

Authorities are permitted to make allowance for factors which may constrain the delivery of new housing under NPPF rules, including protecting the Metropolitan Green Belt and the Surrey Hills Area of Outstanding Natural Beauty (‘AONB’). However I cannot find anywhere any reduction in GBC’s housing target to take account of such constraints.

GBC seems therefore to ignore its own Policy P2 through the housing policies that it has set out in the Local Plan. I understand that the analysis included in the Appendix of the draft local plan shows that around 65% of the developments proposed are to be built on land currently within the Metropolitan Green Belt. This is contrary to the GBC Policy P2 statement to protect the Green Belt.

I believe that GBC has incorrectly interpreted para 83 to 87 of NPPF. There are a number of references I have found which comment on the fact that green belt boundaries should be altered only “in exceptional circumstances”

- Para 83 clearly states green belt boundaries should be altered only “in exceptional circumstances”.
- Ministerial Guidance on the Green Belt (reference Brandon Lewis MP and Nick Bowls MP 17/1/14 and 18/6/14 respectively) shows unmet housing need alone is not likely to qualify as exceptional circumstances.
- Sir Eric Pickles when Secretary of State for Communities and Local Government drew attention to the NPPF which states that the Green Belt may be altered ‘…only in exceptional circumstances…’.
- Sir Paul Beresford, MP for Mole Valley constituency, commented that “we see in the NPPF that Green Belt protection is specifically cited as a consideration which would override the need to meet housing targets. This is a clear statement of government policy.”

There is a tremendous strength of feeling by local people against the way in which GBC is proposing to implement its Green Belt policy. Local social media is awash with complaints about it. Anyone driving along the local lanes will see a large number of notice boards along the roadsides protesting about it. It can also be gauged from the thousands of letters sent protesting about the previous draft plan and the various past and ongoing campaigns being waged by locals against GBC’s initiatives. This policy is hardly “empowering local people to shape their surroundings” as set out in NFPP para 17.

Thus I OBJECT to this policy as set out in the draft local plan for the following reasons:

- The policy is inconsistent with itself
- It runs counter to the NPPF guidelines.
- It runs counter to Ministerial and Governmental guidance.
- It is against the wishes of the local people and thus runs contrary to NPPF para 17.

In addition I OBJECT to the following paragraphs within this policy.

1. **a) Paragraph 4.3.13: Proposal to inset East Horsley from the Green Belt**

East Horsley is a rural village. Its Green Belt status has been a key factor in preserving its character. Policy P2 proposes that East Horsley should be inset from the Green Belt, instead of being ‘washed over’ as it is today.

GBC seems to be saying in paragraph 4.3.12 that East Horsley is not an open village and therefore be inset. I would contest this.

East Horsley Parish Council says; “No less than 36% of East Horsley is composed of woodlands, whilst inside the settlement area there is an average housing density of just 8.1 dwellings per hectare (‘dph’). Woodlands and large residential gardens make a vital contribution towards biodiversity, provide wildlife corridors, and furnish those open spaces which are vital to the character of the greenbelt. It is one thing for a planner to study a map and see a settlement area filled with housing, but it is quite another actually to come to a rural village like East Horsley and see how the Green Belt has preserved the rural character and openness of this village.”

Anyone who has come to East Horsley would recognise that this gives the village an open character which contributes to the open nature of the Green Belt.
In addition NPPF paragraph 17 specifically states that planning should be about “empowering local people to shape their surroundings”. Notice boards by the side of our local roads and comments on local social media sites plus the views of village inhabitants lead me to conclude that the proposed policy does not shape the surroundings in the way local people would wish. This is re-enforced by the number of responses received by GBC regarding the former iteration of the draft local plan. I believe this was around 20,000 most of which were opposed to it.

I can see no facts or arguments within P2 to support GBC’s argument to inset East Horsley from the Green Belt. Nor do I believe it meets NPPF para 17.

I OBJECT therefore to this policy.

1. b) Paragraph 4.3.16 and Proposals Map: Settlement Boundary changes in East Horsley

GBC proposes a number of changes to the settlement boundaries of East Horsley which expand its settlement area.

The NPPF is clear that any change to settlement boundaries must be justified by ‘exceptional circumstances’.

GBC states in this paragraph that such “exceptional circumstances exist to justify the amendment of Green Belt boundaries in order to facilitate the development that is needed and promote sustainable patterns of development”. GBC justifies these changes in the settlement boundaries in order to meet unfulfilled housing need in the borough in the Green Belt & Countryside Study and its accompanying Topic Paper.

However, NPPF Para 83 makes it clear that such an “unfulfilled housing need” alone is not likely to qualify as exceptional circumstances.

Therefore I OBJECT therefore to this policy.

1. c) Paragraph 4.3.17: Proposal to remove Wisley Airfield from the Green Belt

The only justification for this proposal, and its related planned development of over 2000 dwelling thereon, appears to be to meet an unfulfilled housing need.

The NPPF does not considered unmet housing need to be an exceptional circumstance.

This proposal also runs counter to the Council’s own planning officers’ recommendation. Indeed GBC’s Planning Officer, in assessing a previous planning application from the developer of this site, rejected their application, arguing that:

*It has not been demonstrated that the benefits of the proposal amount to very special circumstances such as to clearly outweigh the harm to the Green Belt and the other harm identified.*

This proposal would open the door to the development stated in Policy Site A35 of the draft plan. It would be little short of catastrophic for the local villages, including East and West Horsley, Ripley and Ockham. I have commented further on this matter under Site A35 below.

NPPF paragraph 17 specifically states that planning should be about “empowering local people to shape their surroundings”. The wishes of local people are very much against this proposal as can be deduced from the very many letters GBC received in protest to it in 2015. I am sure they can provide you with the number.

I OBJECT to the proposal to remove Wisley Airfield from the Green Belt as it runs contrary to the NPPF and specifically paragraphs 17 and 83.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I strongly object to the plan proposing to remove Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl that will result. As far as I am aware, there are no exceptional circumstances for these villages and sites being removed from the Green Belt, as is required by the National Planning Policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13211  Respondent: 15588929 / Alex Hutchings  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY P2

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.
I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages.

In particular I OBJECT to the settlement boundary put round East Clandon with no reference to the residents or the Parish Council.

Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
This approach differs from all the other Borough Councils in Surrey.

The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13284  Respondent: 15589665 / Anna Worsley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.
Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/13302</th>
<th>Respondent: 15589857 / Louise Herbert</th>
<th>Agent:</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Policy P2 – Green Belt: I object to this significant erosion of the Green Belt with the proposals for large towns to be developed on Green Belt land thereby removing the openness of the Green Belt. I note in particular the huge developments proposed for the North East quadrant of the borough, which unfairly target our tranquil rural villages on the basis they can provide ‘dormitory’ facilities for commuters to London. The developments directly affecting our villages are the proposals for Wisley Airfield, Gosden Hill Farm, various farms and tracts in the Horsleys and Garlicks Arch at Send. I object that Policy P2 is not met where it states that Green Belt should be protected. I object to the disproportionate use of Green Belt land for housing. Some 65% of the housing proposed is on Green Belt, with little consideration being given to redevelopment of brownfield sites for housing.

I object to GBC’s contravention of the NPPF framework stipulation in paragraph 87 with the proposed developments at Gosden Hill Farm, Ripley, East and West Horsley and Garlicks Arch, Send. Paragraph 87 states “As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.” GBC has not proven any special circumstance for development on these Green Belt areas.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/13303</th>
<th>Respondent: 15589889 / Keith Macdonald</th>
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I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with the sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires that there be an exceptional circumstance for the Green Belt boundaries to be altered, as for any development on the Green Belt. There are no exceptional circumstances for these villages as mere housing need does not constitute a ‘special circumstance’ for encroachment on the Green Belt. Once taken, the Green Belt is lost forever.

There is a real danger that the loss of this Green Belt would result in urban sprawl and the neighbouring villages merging together. The significant development proposed for these villages will result in the character of these villages being completely lost and the surrounding countryside encroached upon. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
I object to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt.
in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition, I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Guildford’s local plan totally disregards the importance of green belt, protection of the environment and Surrey village life. Whilst we cannot stay stagnant and need development this needs to be measured, protect the environment and allow our village life to be maintained and to grow sensibly. Guildford shows it has considered none of these important issues in its local plan which has been poorly drawn up in the extreme.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14421  Respondent: 15590529 / Linda Mumford  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I strongly object to the villages of Send and Ripley being removed from the green belt and in fact any villages in Surrey. Green belt was designed to prevent urban sprawl and Guildford seems intent to destroy this in our lifetime. It is arrogant of the Council in the extreme to present us with such a plan when they should be upholding the need to ensure our green belt remains permanent and intact for future generations, as required by the National Planning Policy Framework. Indeed local Councillors and Central Government were clear in their election promise to safe guard our green belt and you appear to be reneging on this promise for no special reasons. Where is your backbone Guildford you should be defending us not offering us up for sacrifice. Greedy developers will be quick to take advantage and we will be powerless to stop them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13459  Respondent: 15590593 / Johnathan Page  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECTto not protecting the Green Belt (Policy P2)

I OBJECTto the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not adress Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/13477  Respondent: 15590649 / Nigel Freebody  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the manner in which the 2016 draft Local Plan which includes the wholesale destruction of green belt land, including substantial new developments, have been rushed through the local planning process without the due and proper consultation of local residents, environmental, utilities and other affected groups, giving all those concerned adequate time to adequately and effectively respond.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/953  Respondent: 15590649 / Nigel Freebody  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the 2017 revised draft Local Plan for the proposed insetting (policy P2) of the green belt land within the villages of Ripley, Send and Clandon. The revised proposals appear to make no concessions to any of the thousands of previously submitted objections made in respect to the 2016 draft plan. Rather, the proposed amendments seek to expand the proposed developments.

I object to the manner in which the 2017 revised draft Local Plan, which still includes the wholesale destruction of Green Belt land, has been rushed through the local planning process without any apparent due consideration to or concession to all the many previous objections raised.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13479  Respondent: 15590681 / David Godden  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

GREEN BELT - Top priority should be given to saving the Green Belt. The "EXCEPTIONAL CIRCUMSTANCES" under which Green Belt can be developed have NOT been evidenced by GBC, using the flawed data they have come up with in the Draft 2016 Local Plan.

The destruction of rural land is unnecessary and National Policy attaches greater importance on conserving this precious natural resource for wildlife, free from development and pollution that the plan would bring.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
13. I object removing Send Business Park from the Green Belt (4.3.15). Send Business park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for it’s insetting (removal) from the Green Belt, and indeed GBC have not even attempted one. Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Comment ID: pslp171/1439</th>
<th>Respondent: 15593665 / Thomas Cope</th>
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<tr>
<td>I object to the proposal to inset Send Business Park from the Green Belt because:</td>
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<td>• It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation</td>
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<td>• There is highly restricted vehicular access along Tannery Lane in both directions</td>
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<td>• Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate</td>
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<th>Comment ID: PSLPP16/13624</th>
<th>Respondent: 15593729 / Martin Warwick</th>
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<td>I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)</td>
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<td>There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.</td>
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<th>Comment ID: PSLPP16/13625</th>
<th>Respondent: 15593761 / Celestyn Kwapisiewicz</th>
<th>Agent:</th>
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There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13656  Respondent: 15594817 / Toni Thompson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13723  Respondent: 15594817 / Toni Thompson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages and sites to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13674  Respondent: 15595041 / Richard Wilkinson  Agent:
Breach of Metropolitan Green Belt rules

I understand that development on Green Belt land is only permitted under “very special circumstances”. Also, I understand that unfulfilled housing does not constitute very special circumstances.

Furthermore, the reason that land is designated as Green Belt land is for the benefit of the health and well-being of all communities in the area. This includes communities in larger metropolitan areas, such as Guildford. I have seen nothing in the plans to say that the Green Belt no longer provides these benefits to local communities.

I therefore object to the removal of land from the Green Belt on the grounds that:

1. a) it is a breach of Metropolitan Green Belt rules, and
   b) it will have a detrimental impact on the health and well-being of all communities in the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13675  Respondent: 15595105 / James Beauchamp  Agent:

I object to Send being removed from the Green Belt. The Green Belt was established as a permanent feature required by the National Planning Policy Framework and not something that can be taken away under pressure from property developers, unjustified government targets or a Borough Council who prefers to develop in the areas that they believe will give them the least resistance.

There are no special circumstances to justify Send losing its Green Belt status and as a buffer to separate Guildford from Woking it is essential that its Green Belt status be retained.

Local councillors and central government gave a clear election promise to protect the Green Belt. The current proposals renge on those promises.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13678  Respondent: 15595137 / Sheila Keogh  Agent:

We object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13762  Respondent: 15595489 / Michael Crates  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to all erosion of the green belt
2. I object to any "in-setting" of any villages from the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13781  Respondent: 15595553 / Carol Davis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the proposed removal of the Horsleys, Send and Ripley from the Green Belt.

Exceptional circumstances clearly do not exist to justify amendments to Green Belt boundaries as part of the Local Plan process. The villages of East and West Horsley, Send and Ripley and sites at the Former Wisley Airfield (Three Farm Meadows) A35, Garlick's Arch A43 and Clockbarn Nurseries A42 should not be removed from the Green Belt (Policy P2).

The Green Belt provides a buffer from urban sprawl and must not be permanently eroded.

The National Planning Policy Framework, para 87 states that 'As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances'  

The proposal that 8,202 (64.6%) of all proposed new homes are to be built in the Green Belt is totally unacceptable. The areas around the villages of the Horsleys, Clandon, Send and Ripley would account for 50% of the new homes.

West Horsley is proposed to have 35% of its existing number of homes - the largest of any of the proposed developments and this is unsustainable.

The character of the villages would be lost forever and the countryside removed for future generations

The site at Garlick's Arch was added very late to the Plan without prior consultation and with no infrastructure planning. The road network, medical facilities, schools provision and basic utilities would be unable to cope. The proposed 400 houses are not needed in the village or borough and the local area could not support a development of this site. It is totally inappropriate.

GBC's Green Belt and Countryside Report does not address Garlick's Arch so there is NO evidence base to support including this site.

The proposed industrial development of 7,000 sq m is not required as stated by the ELNA report showing an 80% reduction in employment floor space required since the previous plan. There is a brownfield site available at Burnt...
Common which has been taken out of the plan and also the industrial site at Slyfield where further development could take place on the 40 ha available site. This site has been included as a payback for the land for the proposed A3 interchange.

There is no sustainable transport from this site and it has been identified as having a high risk of flooding by the Environment agency, which is higher than GBC’s assessment. This area has flooded many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan.

The site is bordered by Ancient Woodland which must not be removed and is home to a huge amount of wildlife, including protected species. There has been no wildlife report conducted on the site (Policy 14)

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/13788  **Respondent:** 15595585 / Tim Wiggins  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

I object to any use of green belt land for development as there are no special circumstances provided for using this land, as required by the National Planning Policy

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/13796  **Respondent:** 15595649 / Margaret Hunt  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

**POLICY P2**

3. The Green Belt was brought in to prevent ribbon development along major highways causing urban sprawl. The building on Gosden Hill, Garlik Arch and Wisley aerodrome looks very much like ribbon development, connecting up the villages along the A3.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/13795  **Respondent:** 15595681 / Willemien Downes  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional
circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional
circumstances for these villages (as mere housing need does not constitute a 'special circumstance' and the land to be
taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging
into one another. The significant development in these villages will result in the character of these villages being lost and
the countryside encroached. GBC’s Green Belt & Countryside Report does not adress Garlick’s Arch, so there is no
evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common,
with surplus land that could accommodate a further development.

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<td>You are re-designating Green Belt land and this should be discussed and carefully thought out not just changed without consultation. The Green Belt was given a special status for a reason.</td>
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Keep our Green Belt and Villages safe.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<tr>
<td>I object strongly to removing the Green Belt from Chilworth. Its our safeguard to being overwhelmed by various building developments. When we are essentially a village in beautiful countryside all round us.</td>
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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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I object to removing Ripley, Send and Clandon from the Green Belt. I don't believe there are exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/13840  **Respondent:** 15596513 / Christine Matthews  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy p2

Responding to your letter of 2 June 2016 on the Guildford Prosed Local Plan 1. I object to the removal of Send and other villages from the Green Belt and to any of the developments which reduce the current Green Belt boundaries. I thought we had a government commitment to deform the Green Belt and overwhelming local opinion, expressed in the council elections, supporting the retention of the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/13839  **Respondent:** 15596545 / Nye Morgan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing to express my profound disagreement with aspects of this plan. In particular, I object to all developments in the current Green Belt. It is vital that this land remains undeveloped.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/13844  **Respondent:** 15596609 / Della Morgan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing to express my profound disagreement with aspects of this plan. In particular, I object to all developments in the current Green Belt. It is vital that this land remains undeveloped.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/13865  **Respondent:** 15596833 / Brian Alexander  **Agent:**
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<tr>
<th>Comment ID: PSLPP16/13868</th>
<th>Respondent: 15596833 / Brian Alexander</th>
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<tr>
<td>We live in the Send/Ripley/Clandon area because it is close to London and other amenities and enjoys good transport links. BUT we live here primarily because it is a green and pleasant land, protected by the Green Belt, designed to ensure that generations of planners do not allow the metropolitan sprawl to continue unabated. Architects and town planners come and go and few are ever held accountable for terrible errors of judgement. On the other hand, residents and their families stay for generations.</td>
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<td>To remove this area from the Green Belt would be a travesty. This area would rapidly become just another housing development to join Surbiton and Cobham with Guildford and Woking. The urban sprawl would reach far and wide – and once that decision is made, no architect or planner would be able to stand in its way.</td>
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<td>Huge objections were raised two years ago and little victories were achieved. But as with all planning issues, they keep coming back. Here we are in 2016 faced with more house development proposals (on my understanding about 690 homes per year), plus 400 more houses and industrial units at Garlick’s Arch, followed by the relentless pursuit of traveller pitches in Send Hill.</td>
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<th>Respondent: 15596961 / Peter Meadows</th>
<th>Agent:</th>
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<td>I hope and pray that you keep us in the Green Belt. It will be on your collective conscience for ever if you nod it through.</td>
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<th>Respondent: 15597985 / Tina Spong</th>
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<tr>
<td>Having given considerable attention to the proposed Local Plan, being among the newer residents of Ripley who are already experiencing growing problems with traffic congestion here and in the wider area, we are writing to express our views. Please make sure the following grave concerns are shown to the Planning Inspector</td>
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<td>Comment ID: PSLPP16/13912</td>
<td>Respondent: 15598241 / Madeleine Hewish</td>
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<td>I object to any development on the greenbelt.</td>
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<td>I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlick’s Arch (site A43)</td>
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<td>There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.</td>
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<td>This is an extremely beautiful area. Removal from the green belt will cause the local tourist trade to suffer significantly.</td>
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<td>I Object to the Plan as it does not protect the Green Belt - (Policy P2)</td>
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I object to the removal of Ripley, Send and Clandon from the Green Belt, along with the sites of Garlick's Arch (A43) and Wisley Airfield (A35) and the subsequent urban sprawl that threatens them. There are no exceptional circumstances that warrant the removal of these villages and sites - as required by the National Planning Policy.

It is therefore logical for the Plan to develop the existing brownfield site at Burnt Common rather than Garlick's Arch (A43).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/13982  **Respondent:** 15598945 / Jon Fairclough  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

East Horsley and Ripley will be removed from the Green Belt

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/14007  **Respondent:** 15599201 / Marlies Colborne-Barber  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I totally understand that "development" in terms of housing and commercial has to happen, but not on this scale and not at the expense of our vitally important "Green Land". This has to be preserved for future generations and even for the health and wellbeing of the generation of today.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/14054  **Respondent:** 15601057 / Chris Vinall  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public
consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of “About Guildford” (published by the Council) on page 5 states that “… the Plan rejects any schemes that would have a detrimental impact on the Green Belt.” This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.
There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/14079  **Respondent:** 15601121 / Elspeth Anderson  **Agent:**  
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  
**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object to not protecting the Green Belt (Policy P2)  
I object to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages and the land to be taken from the Green Belt. There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.  
Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.  
**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**  
**Attached documents:**

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**Comment ID:** PSLPP16/14119  **Respondent:** 15601185 / Jane Young  **Agent:**  
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  
**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I OBJECT to not protecting the Green Belt (Policy P2)  
This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.  
The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage.
The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of “About Guildford” (published by the Council) on page 5 states that “... the Plan rejects any schemes that would have a detrimental impact on the Green Belt.” This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.
There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14118  Respondent: 15601217 / Patrick Barrass  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I...}
I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14117  Respondent: 15601249 / Ann Barrass  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is
gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of “About Guildford” (published by the Council) on page 5 states that “... the Plan rejects any schemes that would have a detrimental impact on the Green Belt.” This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.
In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14189  Respondent: 15601409 / Adam Wheeler  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing to object most strongly to the proposed local plan. I currently live with my family in Send Marsh and commute to Westcott for work every day.

The proposed construction of hundreds of houses in and around Send Ripley Merrow and the Clandons, will create a density of housing and therefore increased traffic and unsustainable pressure on local services that would be unsafe and downright irresponsible.

My main concerns:

* I object to the erosion of the Green belt. The villages of Ripley, Wisley Clandons and Send, are apparently earmarked to lose their Green Belt status. This is outrageous. Property in this area commands high prices, this is because of the location. Residents accepted the inflated price in return for being able to live in a pleasant semi-rural location, with the knowledge that as there was green belt land in the area it would not change too drastically or become over developed!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14193  Respondent: 15601409 / Adam Wheeler  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

If our Green Belt status is removed, thereby allowing unlimited developments, we will no longer be a village, well be one sprawling town with no personality or green spaces. Having lived in istanbul I've seen what happens when people build with no regard to green spaces or future happiness. Don't let it happen here.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

1. I object to the not protecting the Green Belt (Policy P2)

I strongly object to removing the villages of Ripley, Clandon and Send from the Green Belt.

In addition the sites of Wisley Airfield and Garlicks Arch must not be removed as their development as it would ruin the local area’s environment visually and environmentally. It would become more urban rather than a green environment, which Ripley is so admired for. As required by the National Planning Policy there are no exceptional circumstances for the above sites being removed from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

1. I object to the not protecting the Green Belt (Policy P2)

I strongly object to removing the villages of Ripley, Clandon and Send from the Green Belt.

In addition the sites of Wisley Airfield and Garlicks Arch must not be removed as their development as it would ruin the local area’s environment visually and environmentally. It would become more urban rather than a green environment, which Ripley is so admired for. As required by the National Planning Policy there are no exceptional circumstances for the above sites being removed from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The new boundaries proposed for insetting the villages of Send and Send Marsh/Burnt Common from the Green Belt (policy P2).
The boundaries drawn enclose huge areas of open spaces that should be retained as Green Belt land and not developed at any time in the future. The village boundaries should be much more closely circumscribed to prevent urban sprawl and retain their village identity. With a presumption for development within these ‘inset’ areas, the proposed enclosures would encourage over-development and expansion of the villages in the future and completely ruin their essentially rural nature.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14243  Respondent: 15601857 / Martin Billard  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- The new boundaries proposed for insetting the villages of Send and Send Marsh/Burnt Common from the Green Belt (policy P2).

The boundaries drawn enclose huge areas of open spaces that should be retained as Green Belt land and not developed at any time in the future. The village boundaries should be much more closely circumscribed to prevent urban sprawl and retain their village identity. With a presumption for development within these ‘inset’ areas, the proposed enclosures would encourage over-development and expansion of the villages in the future and completely ruin their essentially rural nature.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14259  Respondent: 15601953 / Stephen Yandle  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- No declaration of support for protecting the Guildford Green Belt, contrary to NPPF and government statements.
- No evaluation of value of local Green Belt as a public and private asset: it’s just treated as potential building land with a few inconvenient restrictions.
- Impact of Green Belt development on local agriculture ignored.
- Impact on rural leisure and tourism ignored.
- Impact on flood control ignored.
- Impact on carbon sink and knock-on effects for air pollution and climate change ignored.
- Impact on biodiversity ignored.
- Impact on natural heritage ignored.
- Impact on water catchment ignored.
- Impact on room for public space amenities (parks, cemeteries, waste facilities etc) ignored.
- Impact on rural business (e.g. mineral mining, film making) ignored.
- Impact on natural landmarks and views ignored.
- Harm to public health and wellbeing (physical, psychological) ignored.
- Allows excessive levels of development in breach of views expressed in last consultation and Conservative Party manifesto commitments at the last local elections.
• Has allowed ruling Councillors to argue that there is an acceptable percentage of Green Belt that should be sacrificed to development, when no such rule exists in the NPPF.
• Ignores alternative approaches, such as fair burden-sharing under which settlements would undertake to accommodate new development in proportion to their size.
• Disproportionate amount of development (most of it, in fact) to be in Green Belt. Too few new homes in urban areas where most people (especially the young and less privileged) want to live. This will act against much needed urban regeneration.
• “Insenting” of most villages disproportionate and unjustified in terms of their contribution under the NPPF to the purposes of the Green Belt. Based on flawed Green Belt and Countryside Study. Idea that most Guildford villages do not contribute to “openness” is subjective.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14316  Respondent: 15602177 / Julia Hunt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Policy P2 green belt This policy states, “the general extent of the Green Belt has been retained.” This is a misleading statement. The policy wording is weak in support of the Metropolitan Green Belt even though the latter forms 89% of the borough and should be the cornerstone of all local planning policy. It is precious beyond the short-term demands of the present Government’s policy or a 15-year local plan. As noted under Policy S1 above, it is a solemn legacy to future generations – an asset and amenity that belongs as much to Londoners and the whole nation as to the people who live in it. Once gone it is gone forever. It is not the Council’s to give away. Policy P2 completely fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it has been around for a long time and it needs to be permanently protected. It was actually established in a local act of parliament in Guildford under the London Home Counties (Green Belt) Act 1938 and subsequently in the 1944 Greater London Plan to contain the outward sprawl of London. The boundaries of the Green Belt through Guildford Borough were later defined in the 1987 Local Plan, forming part of a 19-24km concentric belt around London. The Green Belt is intended to check the unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and other urban land. The principles of the Green Belt designation were outlined within Planning Policy Guidance 2: Green Belts (PPG2) and are found within the National Planning Policy Framework (NPPF). The Metropolitan Green Belt is an exemplar of good planning and the envy of planners throughout the world. Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. Building on it involves high opportunity costs, including an irreversible loss of:

1. Agricultural production
2. Rural leisure and tourism amenities
3. Water catchment
4. Flood control
5. Biodiversity
6. Natural heritage
7. A carbon sink for air pollution
8. Room for public facilities such as parks and burial grounds
9. Profitable film locations (e.g. Shere)
10. Future economic potential such as mineral extraction (even fracking)
11. Natural beauty, landmarks, open space, rural views and sight lines
12. Benefits to public health and wellbeing, physical and psychological (as well expressed in the NPPF)

As a matter of law and national and local policy, these assets should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and
contrary to previous responses to public consultations. It is quite incorrect to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold. I object to the “insetting” of 14 villages from the Green Belt. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost hell bent on self-defeat. I believe this policy is based on a flawed Green Belt and Countryside Study that, according to one Conservative Councillor, was irregularly commissioned by Council officers without the authority of Councillors. To “inset” two thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, although they would quickly destroy them if the proposed “insetting” and boundary extensions go ahead.

I object to the removal of over 400 hectares of Green Belt land in and around Blackwell Farm to facilitate further development of Surrey Research Park and for 1800 homes. Over 60 hectares were removed from Green Belt 12 years ago for the same developer (Surrey University) who has yet to fulfill their planning obligations. This valuable land has been squandered with over 17 acres of surface car parking and as one of the key features of Green belt is its ‘permanence’ this second request for yet more Green Belt land to be released in such a short space of time, with all the outstanding issues that remain makes this all the more objectionable.

Furthermore I object on grounds of the impact this development will have in terms of congestion on our highways, these issues have been highlighted under ‘infrastructure’.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14338  Respondent: 15602273 / Phillip Herrington  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Thirdly, I object to the erosion of the Greenbelt - these proposals do not meet the “exceptional circumstances” requirements. It is the role of this generation of leaders to protect the green belt for the next generation, not destroy it.

I note with interest that the Conservative Party manifesto at the 2015 General Election committed a Conservative Government to “prioritise brownfield development”.

It said: “We will ensure that local people have more control over planning and protect the Green Belt.

They said they will encourage more neighbourhood planning and protect the Green Belt. “Neighbourhood planning gives more power to local people, allowing them to play a much stronger role in shaping their areas.”

I assume that, having been voted in on this basis, that pledge will be honoured.

The scale and location of the proposed developments in the Horsley’s are not on and I object to them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14342  Respondent: 15602273 / Phillip Herrington  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I would urge you to remember that “place” is important, it is deeply ingrained in our human psyche, and it would be dangerous for political leaders to overlook that fact. When people feel ignored, feel they are being trodden over roughshod, in the end they rebel - as has been demonstrated in the EU referendum. When elections come, people won’t forget

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14354  Respondent: 15602401 / Ian Pollard  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Greenbelt Protection; I note that approximately 65% of the proposed developments will involve breaching current Green belt boundaries, and this appears to conflict with the Council's own policies. The compromise of Greenbelt boundaries is also a matter worthy of National concern, and at least worthy of a collective and integrated consideration by London and South East Boroughs. Any proposals that potentially impact upon the existing Metropolitan Greenbelt should be subject to much more detailed environmental and socio-economic impact assessment, and Stakeholder consultation, than is contained within the current Local Plan proposals

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16250  Respondent: 15602529 / Darren Lambert  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the large proposed development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14392  Respondent: 15602561 / Jonathan Clark  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

It has been brought to my intention that a number of new housing developments are planned and it is the intention that many local villages are to be "inset" or removed from the Green Belt, this must not happen, the local villages are part of
our National Heritage and once they are gone they can never be brought back, the Green Belt was a defining moment in planning and should be preserved at all costs.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14396</th>
<th>Respondent: 15602561 / Jonathan Clark</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>

I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There are **no exceptional circumstances** for these villages and sites being removed, as required by the National Planning Policy.

The Plan should develop the existing **brownfield** site at Burnt Common rather than developing Garlick’s Arch (A43).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14431</th>
<th>Respondent: 15602817 / Paul Douek</th>
<th>Agent:</th>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlick’s Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16478</th>
<th>Respondent: 15603297 / Rony Douek</th>
<th>Agent:</th>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
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</table>

- I object to not protecting the Green Belt (Policy P2). I object and find it completely unacceptable to remove Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43). These are all critical for the local communities and the beauty of the area. It is also my understanding that there are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed. This cannot be granted without the consent of the local community.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14483  Respondent: 15603361 / Ann Watkins  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO ALL POLICIES INVOLVING BUILDING IN THE GREEN BELT:
• No “exceptional circumstances” shown, numbers excessive and the clearly expressed views of residents in previous consultations ignored.

I OBJECT to A43 Garlick’s Arch – the site floods and is covered in ancient woodland. The industrial space is not needed and if necessary could be accommodated at Slyfield. With proper use of brownfield sites this Green Belt site is not needed.

I OBJECT to A43a - the on and off ramp at Clandon – this will increase traffic problems in the villages, not help them, and increase the speed and density of the traffic through our villages and past local schools, as well as increase noise and pollution levels which are already at excessive levels.

I OBJECT to A45 the Talbot – this is overdevelopment in a conservation area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16262  Respondent: 15603361 / Ann Watkins  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO ALL POLICIES INVOLVING BUILDING IN THE GREEN BELT:
• No declaration of support for protecting the Guildford Green Belt, contrary to NPPF and government statements. • No evaluation of value of local Green Belt as a public and private asset: it’s just treated as potential building land with a few inconvenient restrictions. • Impact of Green Belt development on local agriculture ignored. • Impact on rural leisure and tourism ignored. • Impact on flood control ignored. • Impact on carbon sink and knock-on effects for air pollution and climate change ignored. • Impact on biodiversity ignored. • Impact on natural heritage ignored. • Impact on water catchment ignored. • Impact on room for public space amenities (parks, cemeteries, waste facilities etc) ignored. • Impact on rural business (e.g. mineral mining, film making) ignored. • Impact on natural landmarks and views ignored. • Harm to public health and wellbeing (physical, psychological) ignored. • Allows excessive levels of development in breach of views expressed in last consultation and Conservative Party manifesto commitments at the last local elections. • Has allowed ruling Councillors to argue that there is an acceptable percentage of Green Belt that should be sacrificed to development, when no such rule exists in the NPPF. • Ignores alternative approaches, such as fair burden-sharing under which settlements would undertake to accommodate new development in proportion to their size. • Disproportionate amount of development (most of it, in fact) to be in Green Belt. Too few new homes in urban areas where most people (especially the young and less privileged) want to live. This will act against much needed urban regeneration. • “Insetting” of most villages disproportionate and unjustified in terms of their contribution under the NPPF to the purposes of the Green Belt. Based on flawed Green Belt and Countryside Study. Idea that most Guildford villages do not contribute to “openness” is subjective. • Major settlement extensions allow indiscriminate housebuilding, as irregularly shaped villages are squared off to enclose green fields. • Overall harm
to Guildford Green Belt unjustified by any objective development need post-Brexit. • Ignores most of NPPF 17 stipulations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14542  Respondent: 15603489 / Simon Pitt  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It
is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing
development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the
NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored.
Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems
almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the
Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I
cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could
quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of
opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their
surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as
an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield
(A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires
there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt.
There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special
circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging
into one another. The significant development in these villages will result in the character of these villages being lost and
the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support
including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common,
with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14564</th>
<th>Respondent: 15603489 / Simon Pitt</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
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I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or
other constraints. The plan says that “allocating these sites does not grant planning permission for
development.” However, each of the sites will be removed from the Green Belt and will be available in
principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site
justification shows contempt for the thousands of detailed comments the Council have received about individual
sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council
received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that
the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was
produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the
previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to
consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as III as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as III as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14561  Respondent: 15603521 / Nicholas Bullman  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

In reference to: Policy P2 - Green Belt and the Countryside, and Policy P1 - Surrey Hills Area of Outstanding Natural Beauty (AONB)

- The proposed plan is not in-line with continuing to “protect the Metropolitan Green Belt against inappropriate development”
- I am opposed to West Horsley village being removed from the Green Belt by insetting and expanding the 2003 Local Plan Settlement Area boundaries. No justification is given, exceptional circumstance or otherwise, for the New Green Belt boundaries that will result from the proposed insetting of the two parts of the village from the Metropolitan Green Belt.
- The Green Belt and Countryside Study is flawed
- West Horsley’s current Settlement Area boundaries (ref 2003 Local Plan) do not need extending
- West Horsley receives a significant number of recreational visitors (including cyclists, and walkers) throughout the year. This is due to the current housing density settlements, variety of historic buildings and position on the north side of the North Downs, partly in the Surrey Hills AONB. The proposed plan would negatively affect the enjoyment gained by these visitors.
- The Key Evidence document ‘Guildford Borough Economic Strategy 2013-2031 does not make any case for locating large numbers of homes in West and East Horsley or neighbouring villages. In fact, the proposed new economic development site proposals are on the opposite side of the Borough to West Horsley!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
As a resident within the Ripley Greenbelt I strongly object to the local plans for removal of the green belt for development. As an ecologist, I object to this based on the effect it will have on local wildlife populations and habitats, with regards to hedgehogs, badgers and rare bat species in the area. Along with the aforementioned points I object for the following reasons:

1- the loss of any Greenbelt area is a sad thing
2- any in-setting of any village from the green belt is unthinkable to those that live here and adore the tranquility of the countryside
3- it creates disproportionate amounts of development across the borough and puts pressure on sounding roads and amenities
4- there was a very limited consultation period for the plan
5- the inclusion of new sites was given with less than two weeks notice
6- where are the numbers that state we need this vast amount of housing in the area
7- where is the evidence for the increased capacity towards schools, hospitals and other local services
8- where are the ecological reports stating that the site is clear for development
9- you want to destroy one of the last untouched spacious areas in Surrey that make it desirable- people won't be here if you build over what attracts them

The whole plan is a travesty and has caused discord across the borough. These villages have stood in scenic land and protect space from the London sprawl for 100's of years, what gives you the right to sign away the land for profit?

Please, read and listen to those of us that will be affected by this. Hasn't this country suffered enough loss already this year. Make the right choice.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14627  Respondent: 15604161 / Simon Greener  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

As you are intending to destroy the Village for future generations it is incumbent upon me to let you know the feelings of my daughter:

[Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998]

I object to removing Send from the Greenbelt because: “If you cut down the trees then the animals won’t have anywhere to live and they will die.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1957  Respondent: 15604161 / Simon Greener  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the proposal to inset Send Business Park from the Green Belt because:

· It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation

· There is highly restricted vehicular access along Tannery Lane in both directions

· Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate.

I feel we are fighting against a route that you are taking that appears entirely fait accompli. Why this is the case is hard to fathom. Once you lose the Greenbelt and impose what it is you are proposing in the countryside you lose forever what makes this area special. Not just for residents but for those who visit and for future generations.

Stop for just a moment to consider the enormity of what it is you are proposing and what value you propose to destroy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14657  Respondent: 15604289 / Lesley Pitt  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
<table>
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Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites. I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this. I object to the "insetting" of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them. 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To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead. 6 This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions. Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth. 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Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14699  Respondent: 15604289 / Lesley Pitt  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

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4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14668  Respondent: 15604449 / Annabel Curling  Agent:
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This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of “About Guildford” (published by the Council) on page 5 states that “... the Plan rejects any schemes that would have a detrimental impact on the Green Belt.” This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

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I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.
This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14691  Respondent: 15604961 / Gilbert Davies  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I would like it to be known that I object to Chilworth being removed from the Green Belt in your plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14704  Respondent: 15606561 / Rebecca Warwick  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

** I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlick’s Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
**I object to not protecting the Green Belt (Policy P2)**

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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Comment ID: PSLPP16/14705  **Respondent:** 15606593 / James Green  **Agent:**

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**I object to not protecting the Green Belt (Policy P2)**

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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Comment ID: PSLPP16/14706  **Respondent:** 15606625 / Rebecca Sear-George  **Agent:**

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**I object to not protecting the Green Belt (Policy P2)**

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

---

Comment ID: PSLPP16/14707  **Respondent:** 15606657 / Kim Hopwood  **Agent:**

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**I object to not protecting the Green Belt (Policy P2)**

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.
I object to the removal of Ripley, Send and Clandon from the Green Belt, along with the sites of Garlick's Arch (A43) and Wisley Airfield (A35) and the subsequent urban sprawl that threatens them. There are no exceptional circumstances that warrant the removal of these villages and sites - as required by the National Planning Policy.

It is therefore logical for the Plan to develop the existing brownfield site at Burnt Common rather than Garlick's Arch (A43).

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of "only" 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an "acceptable" percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor
is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of “About Guildford” (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the "insetting" of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the "openness" of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To "inset" two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed "insetting" and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of "empowering local people to shape their surroundings" and other NPPF provisions.

Paragraph 4.3.17 states that "the general extent of the Green Belt has been retained." I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Comment ID: PSLPP16/14816  Respondent: 15607681 / Robin Hopwood  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14831  Respondent: 15607937 / Joanna Kaminska-Hine  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to removing the local villages of Ripley, Send and Clandon from the Greenbelt. This proposal interferes with the purpose of the greenbelt which is to prevent urban sprawl and removing the villages would seem to be encouraging an urban sprawl and directly damaging the integrity of the greenbelt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14857  Respondent: 15608225 / Louise Wickham  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

** I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14864  Respondent: 15608289 / Olivia Marshall  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

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I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.
Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14885  Respondent: 15608289 / Olivia Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very
special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14889  Respondent: 15608545 / Madeleine Ringshaw  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt). This yet another example of an ill thought out plan and approach. Once taken the Green Belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl with these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost - to the serious detriment of residents and visitors to the area - and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14909  Respondent: 15608801 / Beth Fuller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt). Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost - to the serious detriment of residents and visitors to the area - and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/14934</th>
<th>Respondent: 15609025 / Anne Wilson</th>
<th>Agent:</th>
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I would like it to be known that I object to Chilworth being removed from the Green Belt in your plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/14946</th>
<th>Respondent: 15609057 / Julian Long</th>
<th>Agent:</th>
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I object to Policy P2 - Send should not be removed from the Green Belt. Send provides a buffer between Woking and Guildford. The particularly vulnerable areas of land being taken out of the Green Belt include (i) the land behind the school, including playing fields and woodland; (ii) the land to the right of Cartbridge by the Wey Navigation up to the new boundary fence with Vision Engineering; (iii) land to the left of Cartbridge going up to the old depot on the Wey navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/14973</th>
<th>Respondent: 15609345 / Paul Thomas</th>
<th>Agent:</th>
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</table>

I am objecting most forcefully to destroying the Green Belt as outlined in the Guildford Local Plan (June 2016). This contravenes the whole purpose of it and makes no sense at all.

The removal from the Green Belt of parts of Ripley, Send, Clandon and Garlic Arch would be detrimental to the health and welfare of the residents.

With the development of Wisley Airfield the impact on the local road system would overload the capacity and cause gridlock.

Has the impact of these developments considered the need of schools, hospitals and other amenities.

Once the Green Belt has been concreted over it will never be replaced.

I can not agree with any of the proposed developments
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14984  Respondent: 15609473 / Ed Baker  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

In the plan 65% of the new houses proposed are to be built on Green Belt in some locations, the proportion is much higher. This cannot be allowed to happen. The purpose of the Green Belt is to confine development to designated areas and to specifically protect other areas. Government policy is to preserve and protect the Green Belt and the London Mayor very recently reinforced that planning policy must respect the Green Belt which has five purposes:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Government has stated that the construction of new buildings should be regarded as inappropriate for the green belt because one of the characteristics of the green belt is its permanence. The effect of building on this land, especially at a high density, cannot be reversed - trees, plants and animal habitats are lost and the character of the locality is irreversibly damaged.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14988  Respondent: 15609505 / Frank Ray  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

The Plan should develop the existing brownfield site at Burnt Common rather than developing Garlick’s Arch (A43).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/759  Respondent: 15609569 / Nicola Shouesmith  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Page 1642 of 1782
I would like to object very strongly to the latest draft of the GBC local plan.

This still proposes to inset East Horsley from the Greenbelt. The development of 100 homes is proposed near Horsley station and over 2000 on the Wisley Airfield. The village of East Horsley (and surrounding villages such as West Horsley, Effingham and Ripley) do not have the infrastructure in terms of transport (roads, parking or rail), schools or medical facilities to adequately meet this increased demand.

57% of new housing proposed is on land that is currently categorised as Greenbelt and this is, quite frankly, shameful as this land is land that was supposed to be protected for future generations.

Since Brexit, forecasts of increasing population numbers have been significantly reduced. The ONS forecast is now only forecasting 10.4% for Guildford, which still intends to increase its housing stock by 22%. This doesn't seem to make sense?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

 Attached documents:
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15108  Respondent: 15610433 / Clare Porter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

** I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15107  Respondent: 15610465 / Tess Corlett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15126  Respondent: 15610529 / Mark Ransome  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the removal of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the result will be an urban sprawl. Like many other residents I chose to move to Ripley because it was in the Green Belt.

Section 4.3.12 quotes “only those villages whose open character makes an important contribution to the openness of the Green Belt should be included in the Green Belt”.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Ripley, Send and Clandon all meet this criterion. If this was not so, why were these villages part of the Green Belt in the first place? To suggest otherwise is just a matter of opinion and not a statement of fact. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15140  Respondent: 15610561 / Jo Graham  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Protection of the Greenbelt

This proposal is a massive encroachment of the Metropolitan Green belt and the size of the development is totally inappropriate. The development will fundamentally change the character of the surrounding villages and will result in over development of an area which can be classified as an area of natural beauty.

The villages are set in a parish of well established, well spaced out, low rise housing with a considerable number of historic buildings. The developments as proposed would destroy the character and charm of the area that the residents of Horsley and surrounding areas have respected, protected and loved for decades.

I have previously commented and objected to recent planning proposals of this scale. The creation of a ‘town’ on the Wisley airfield will destroy a site of Nature conservation importance, create additional pollution and adversely impact the tranquillity and character of the local area.

The new proposal of houses in Horsley and the surrounding villages further creates a detrimental environment from a social and environmental perspective

I grew up in East Horsley and after careful saving, was fortunate to return to live in the village to where I consider home, offering the peaceful lifestyle I require and raise my own family. Any developments in the area will considerably change this profile and potentially threaten my lifestyle choice.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15180  Respondent: 15610785 / Liz Vinall  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public
consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of “About Guildford” (published by the Council) on page 5 states that “… the Plan rejects any schemes that would have a detrimental impact on the Green Belt.” This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

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There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15224  Respondent: 15611137 / Scott Hutchinson  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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Attached documents:

Comment ID: PSLPP16/15225  Respondent: 15611201 / Jed Alexander  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2145  Respondent: 15611361 / Elizabeth Maycock  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Despite the volume of comments received, I object to the fact that no change has been made to the proposal that the Horsleys should be both removed from the green belt and that the settlement boundaries be extended at the same time. I welcome the reduction by 90 in the number of new homes projected for west Horsley but the draft plan still proposes far too many new homes on green belt land and, additionally, the east side of the borough is now to take an even greater proportion of these. Should not Guildford follow the choice of many reduced objectively assessed housing target will mean that Guildford will have grown by nearly 25%, nearly double the prediction for the growth of Guildford made by the office for national statistics, by 2034 (the end of the Plan Period).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15278  Respondent: 15612481 / Gillian Culmer  Agent: 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
archaeological merit. I demand that this proposal be removed as it will endanger the openness of the Green Belt, the views in and out of the AONB (protection of the AONB Policy P1) and the character of our village.

Policy P2 – Green Belt: I object to this significant erosion of the Green Belt with the proposals for large towns being developed on Green Belt land thereby removing the openness of the Green Belt. I note in particular the huge developments proposed for the North East quadrant of the borough which will adversely affect our amenity, but also unfairly targets our tranquil rural villages because we can provide ‘dormitory’ facilities for commuters to London. The developments directly affecting our villages are the proposals for Wisley Airfield, Gosden Hill Farm, various farms and tracts in the Horsleys and Garlicks Arch at Send.

Further, on the erosion of Green Belt and I object that Policy P2 is not met where it states that Green Belt should be protected. I object to the disproportionate use of Green Belt land for housing – some 65% of the housing proposed is on Green Belt and with little consideration being given to redevelopment of brown field sites.

I object that GBC are contravening the NPPF framework stipulation in paragraph 87 with the proposed developments at Gosden Hill Farm, Ripley, East and West Horsley and Garlicks Arch, Send. Paragraph 87 states “As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.” and GBC have not proven any special circumstance for developing on these Green Belt areas.

I object to building on the Green Belt because the essential characteristic of Green Belt is its openness and permanence (National Planning Policy Framework paragraph 79).

I object that housing being proposed on the Green Belt will increase traffic bringing increased danger and pollution and slower journey times on our already overcrowded village roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
• Ignores alternative approaches, such as fair burdensharing under which settlements would undertake to accommodate new development in proportion to their size.
• Disproportionate amount of development (most of it, in fact) to be in Green Belt. Too few new homes in urban areas where most people (especially the young and less privileged) want to live. This will act against much needed urban regeneration.
• “Insetting” of most villages disproportionate and unjustified in terms of their contribution under the NPPF to the purposes of the Green Belt. Based on flawed Green Belt and Countryside Study. Idea that most Guildford villages do not contribute to “openness” is subjective.
• Major settlement extensions allow indiscriminate housebuilding, as irregularly shaped villages are squared off to enclose green fields.
• Overall harm to Guildford Green Belt unjustified by any objective development need postBrexit.
• Ignores most of NPPF 17 stipulations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15426  Respondent: 15614497 / Hannah Yandle  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO ALL POLICIES INVOLVING BUILDING IN THE GREEN BELT:
• No “exceptional circumstances” shown, numbers excessive and the clearly expressed views of residents in previous consultations ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15435  Respondent: 15614721 / Charles Leonard  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

These proposed new local plans are on areas of designated green-belt land which holds permanent green-belt status.

Our green-belt land is home to a very large number of flora, fauna and wildlife, including some very rare bird species, all of which would be lost forever if these new proposed plans were to go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15436  Respondent: 15614753 / Anthony McCulloch  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
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<tr>
<th>Comment ID: PSLPP16/16914</th>
<th>Respondent: 15615297 / Carole Butcher</th>
<th>Agent:</th>
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<td>I write to register my strong objections to the new local plans for Surrey.</td>
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<td>I object to the sites in the Horsleys, Send, Clandon, Ripley and all surrounding areas.</td>
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<td>The proposed sites are neither adequate nor viable for building in such a huge capacity.</td>
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<td>In reference to: Policy P2 - Green Belt and the Countryside, and Policy P1 - Surrey Hills Area of Outstanding Natural Beauty (AONB)</td>
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<td>• The changes are unreasonable and will change the look, feel and environment of our village forever.</td>
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<td>The proposed plan is not in-line with continuing to “protect the Metropolitan Green Belt against inappropriate development”</td>
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<td>• I am opposed to West Horsley village being removed from the Green Belt by insetting and expanding the 2003 Local Plan Settlement Area boundaries. No justification is given, exceptional circumstance or otherwise, for the New Green Belt boundaries that will result from the proposed insetting of the two parts of the village from the Metropolitan Green Belt.</td>
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<td>• The Green Belt and Countryside Study is flawed</td>
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<td>• West Horsley’s current Settlement Area boundaries (ref 2003 Local Plan) do not need extending</td>
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<td>• West Horsley receives a significant number of recreational visitors (including cyclists, and walkers) throughout the year. This is due to the current housing density settlements, variety of historic buildings and position on the north side of the North Downs, partly in the Surrey Hills AONB. The proposed plan would negatively affect the enjoyment gained by these visitors.</td>
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<td>• The Key Evidence document ‘Guildford Borough Economic Strategy 2013-2031 does not make any case for locating large numbers of homes in West and East Horsley or neighbouring villages. In fact, the proposed new economic development site proposals are on the opposite side of the Borough to West Horsley!</td>
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I do not see a justification for the apparently exceptional circumstances that might justify amendment of Green Belt boundaries.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

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Attached documents:

Comment ID: PSLPP16/15590  **Respondent:** 15617185 / Michelle Mitchell  **Agent:**

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Comment ID: PSLPP16/15618  **Respondent:** 15618305 / Lawrence Claridge  **Agent:**

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Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as
an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield
(A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires
there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt.
There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special
circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging
into one another. The significant development in these villages will result in the character of these villages being lost and
the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support
including this site.
Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPP16/15617  **Respondent:** 15618337 / Matthew Pitt  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It
is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing
development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the
NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored.
Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems
almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the
Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I
cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could
quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of
opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their
surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as
an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield
(A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires
there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt.
There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special
circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging
into one another. The significant development in these villages will result in the character of these villages being lost and
the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support
including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common,
with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15649  Respondent: 15618465 / Tom Hill  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

I object to all erosion of the green belt !
Save the green belt !!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15651  Respondent: 15618561 / Howard Klein  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The plans encroach into the Green Belt to an unacceptable degree whereby the beautiful environment of Surrey will be devalued immeasurably: towns get bigger, villages appear to merge and we end with endless conurbations which lose the vital “breathing space”.

1. Some existing villages, e.g. Ripley, will be affected will be irreversibly damaged; and
2. Huge new settlements, such as Gosden Hill (see below) will destroy vitally important space around Guildford.

I note promotional content that “our most important countryside, landscapes, and heritage” (per http://www.guildford.gov.uk/newlocalplan/) should be protected, but there are so many aspects to be considered. And while I may not be an expert, nor have the time to scrutinise all the documentation, I note, for example, that of the GBCS 2012 identified villages (Chilworth, East Horsley, Effingham, Fairlands, Flexford, Gomshall, Jacobs Well, Normandy, Peasmarsh, Ripley, Send, Send Marsh/Burnt Common, Shalford, Shere, West Horsley and Wood Street Village) just 2 are excluded. It appears that the residents of the remainder have to suffer the butt of the Plan.

I missed seeing the impact of separate plans to build further homes on the Clandon Estate, removing it from the Green Belt; turning the GBCS “on its head” (Source: MRA). This adds significant housing to the existing population of 8,000/3,500(?) homes, which includes Merrow Park. I am unsure how this extra development fits into satisfying the housing assessment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15659  Respondent: 15618689 / Julia Ray  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The greenbelt is highly precious to those in this area - and also to those in London who can access green areas within striking distance. You are pushing the urban sprawl from London further and further out and destroying the pleasure and health benefits our community gain from these areas.

Consider brown field sites only. If you develop our loved green belt, it is gone for ever, which will a travesty. Previous generations provided this for us with good intentions and the benefits they hoped would last for future generations. We went to keep our green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15665  Respondent: 15618881 / Jayne Barmby  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT. This policy states, “the general extent of the Green Belt has been retained.” This is an untrue. The policy wording is tepid in support of the Metropolitan Green Belt even though the latter forms 89% of the borough and should be the cornerstone of all local planning policy. It is precious beyond the short-term demands of the present Government’s policy or a 15-year local plan. As noted under Policy S1 above, it is a solemn legacy to future generations
– an asset and amenity that belongs as much to Londoners and the whole nation as to the people who live in it. It is an inalienable public good. Once gone it is gone forever. It is not the Council’s to give away.

Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. Building on it involves high opportunity costs, including an irreversible loss of:

- Agricultural production
- Rural leisure and tourism amenities
- Water catchment
- Flood control
- Biodiversity
- Natural heritage
- A carbon sink for air pollution
- Room for public facilities such as parks and burial grounds
- Profitable film locations (e.g. Shere)
- Future economic potential such as mineral extraction (even fracking)
- Natural beauty, landmarks, open space, rural views and sight lines
- Benefits to public health and wellbeing, physical and psychological (as well expressed in the NPPF)

(See Ministerial foreword: “Our natural environment is essential to our wellbeing, and it can be better looked after than it has been. Habitats that have been degraded can be restored. Species that have been isolated can be reconnected. Green Belt land that has been depleted of diversity can be refilled by nature – and opened to people to experience it, to the benefit of body and soul.”)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15666  Respondent: 15618881 / Jayne Barmby  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

As a matter of law, morality and national and local policy, these assets should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultations.

It is disreputable to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold. No-one argues that we should sell 1.6% of the Crown jewels in order to build houses.

I am not opposed to appropriate development in the Green Belt and recently supported a major planning application in my own village. But I fail to see why a system of fair burden-sharing of new development cannot be applied to the borough’s existing settlements in proportion to their size. This alternative would minimise the strain on infrastructure and maximise the chances of retaining the character of each settlement through gradual growth.

It is reasonable to ask urban Guildford, with x times the population of semi-rural East Horsley for instance, to accommodate x times the number of new homes over the plan period. Parish councils could be asked, and will no doubt be willing, to propose where their quota of houses should go. Most rural residents are reasonable people who, if not alienated by top-down planners, will support realistic numbers of new houses in their neighbourhoods.

Unfortunately, this democratic, bottom-up approach has not been attempted.

Instead, while developers flip and land-bank urban sites as a financial speculation, this plan will dump most new development on greenfield sites where building costs are lower, covering the Green Belt with dozens of housing estates that few residents want. 8,086 new houses are planned for the Green Belt but only 1,135 for Guildford urban area. This is disruptive, socially inequitable and unnecessary. It will not only destroy countryside but will also delay and disincentivise much-needed urban regeneration. The remarkable revival and repopulation of central London shows that building dormitory satellite settlements is an out-of-date approach to planning.

I particularly protest at the “insetting” of 14 villages from the Green Belt, and at “infilling” 12 of the borough’s Green
Belt villages. I am deeply disturbed that settlement boundaries are to be hugely extended in many villages and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are “leggy” in outline, reflecting the effect of ribbon development (often along just one side of existing roads) permitted between the Wars. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems determined on self-defeat. I believe this policy is based on a flawed Green Belt and Countryside Study that, according to one Conservative Councillor, was irregularly commissioned by Council officers without the authority of Councillors. (Councillor Matthew Sarti, Planning Committee meeting, 18 May 2016) To “inset” two thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, although they would quickly destroy them if the proposed “insetting” and boundary extensions go ahead. This policy is wildly disproportionate in terms of any foreseeable development need (especially post-Brexit) and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15669  Respondent: 15618881 / Jayne Barmby  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development, however, it does identify the principle of development and uses.” This ignores the tens of thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. This amounts to a war of attrition by the Council in conjunction with developers, since many busy residents are sick and tired of repeating the same comments to deaf ears. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. This plan is out of date and not creditable. (Further discredited by criminality on the Council. Former lead Councillor for planning Monika Juneja, architect of the 2014 draft plan, is currently serving a two-year sentence on 3 counts of forgery, pretending to be a barrister and obtaining dishonest pecuniary advantage.)

13 Some residents have concluded that commenting is a waste of time. All Green Belt sites should be removed from the plan until “exceptional circumstances” for development are proven, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. (E.g. Gallagher Homes v Solihull Metropolitan Borough Council [2014] EWHC 1283)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17924  Respondent: 15618881 / Jayne Barmby  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the 2016 draft Guildford local plan, specifically policy P2-green belt.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15690  Respondent: 15618977 / Chris Marles  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Surely Green Belt is sacrosanct.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15697  Respondent: 15619041 / Jack Cross  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy P2 - Green Belt

I strongly object to GBC considering building new developments of 2,000 houses in Green Belt. I object to Gosden Hill, Blackwell Farm and the former Wisley Airfield becoming new towns in the Green Belt for reasons of economy and convenience. Wisley in particular is too close to neighbouring towns and would undoubtedly become part of those areas in time, completely eroding the Green Belt in this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18690  Respondent: 15619201 / Michael Conoley Associates (James Deverill)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy P2: Green Belt

It is agreed that the forthcoming Green Belt Supplementary Planning Document (SPD) should set out guidelines on the scale of development that this likely to be considered appropriate and how this is calculated. This will help provide greater clarity to applicants wishing to extend their homes although the figures should still be considered in relation to other design criteria.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15730  Respondent: 15623425 / Jean Davy  Agent:
I object to Policy P2 green belt. This policy states, “the general extent of the Green Belt has been retained.” This is a misleading statement. The policy wording is weak in support of the Metropolitan Green Belt even though the latter forms 89% of the borough and should be the cornerstone of all local planning policy. It is precious beyond the short-term demands of the present Government’s policy or a 15-year local plan. As noted under Policy S1 above, it is a solemn legacy to future generations – an asset and amenity that belongs as much to Londoners and the whole nation as to the people who live in it. Once gone it is gone forever. It is not the Council’s to give away. Policy P2 completely fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it has been around for a long time and it needs to be permanently protected. It was actually established in a local act of parliament in Guildford under the London Home Counties (Green Belt) Act 1938 and subsequently in the 1944 Greater London Plan to contain the outward sprawl of London. The boundaries of the Green Belt through Guildford Borough were later defined in the 1987 Local Plan, forming part of a 19-24km concentric belt around London. The Green Belt is intended to check the unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and other urban land. The principles of the Green Belt designation were outlined within Planning Policy Guidance 2: Green Belts (PPG2) and are found within the National Planning Policy Framework (NPPF). The Metropolitan Green Belt is an exemplar of good planning and the envy of planners throughout the world. Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. Building on it involves high opportunity costs, including an irreversible loss of: 1. Agricultural production
2. Rural leisure and tourism amenities
3. Water catchment
4. Flood control
5. Biodiversity
6. Natural heritage
7. A carbon sink for air pollution
8. Room for public facilities such as parks and burial grounds
9. Profitable film locations (e.g. Shere)
10. Future economic potential such as mineral extraction (even fracking)
11. Natural beauty, landmarks, open space, rural views and sight lines
12. Benefits to public health and wellbeing, physical and psychological (as well expressed in the NPPF)

As a matter of law and national and local policy, these assets should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultations. It is quite incorrect to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold. I object to the “insetting” of 14 villages from the Green Belt. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost hell bent on self-defeat. I believe this policy is based on a flawed Green Belt and Countryside Study that, according to one Conservative Councillor, was irregularly commissioned by Council officers without the authority of Councillors. To “inset” two thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, although they would quickly destroy them if the proposed “insetting” and boundary extensions go ahead.

I object to the removal of over 400 hectares of Green Belt land in and around Blackwell Farm to facilitate further development of Surrey Research Park and for 1800 homes. Over 60 hectares were removed from Green Belt 12 years ago for the same developer (Surrey University) who has yet to fulfill their planning obligations. This valuable land has been squandered with over 17 acres of surface car parking and as one of the key features of Green belt is its 'permanence' this second request for yet more Green Belt land to be released in such a short space of time, with all the outstanding issues that remain makes this all the more objectionable.

Furthermore I object on grounds of the impact this development will have in terms of congestion on our highways, these issues have been highlighted under 'infrastructure'.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15756  Respondent: 15623745 / Stella May  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to ALL Green Belt sites allocated for development in the local plan object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development, however, it does identify the principle of development and uses.” This ignores the tens of thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. This amounts to a war of attrition by the Council in conjunction with developers, since many busy residents are tired of repeating the same comments as it appears to be a waste of time and effort. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014.13 All Green Belt sites should be removed from the plan until “exceptional circumstances” for development are proven, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15792  Respondent: 15624577 / Alec Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of “About Guildford” (published by the Council) on page 5 states that “… the Plan rejects any schemes that would have a detrimental impact on the Green Belt.” This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.
This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object in principal to the lack of protection of the Green Belt. It was created with great foresight for a purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17929  Respondent: 15627009 / Alison Morrison  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object in principle to the removal of areas from the Green Belt, and note that the areas to be cut out of the Green Belt include some of the most attractive villages in North Surrey, most obviously East Clandon, which together with Hatchlands and West Horsley place form an area of unique character and beauty in Surrey.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15928  Respondent: 15627105 / Julia McClung  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the proposed removal of West Horsley from the Green Belt by insetting and extending the 2003 Local Plan Settlement Area boundaries. The Green Belt & Countryside Study is flawed and the key evidence document ‘Guildford Borough Economic Strategy 2013-2031’ makes no case for locating large numbers of new homes in West and East Horsley or neighbouring villages. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15932  Respondent: 15627137 / Katie McClung  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the proposed removal of West Horsley from the Green Belt by insetting and extending the 2003 Local Plan Settlement Area boundaries. The Green Belt & Countryside Study is flawed and the key evidence document ‘Guildford Borough Economic Strategy 2013-2031’ makes no case for locating large numbers of new homes in West and East Horsley or neighbouring villages. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Green Belt (Policy P2)
Our Green Belt is precious. It is what protects London from urban sprawl; it preserves air quality; it prevents flooding; it is the city’s playground. It is for us to conserve and protect it. There are five legal purposes for Green Belt, and it meets them all:
• To check the unrestricted sprawl of large built up areas
• To prevent neighbouring towns merging into one another
• To assist in safeguarding the countryside from encroachment
• To preserve the setting and special character of historic towns
• To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

The Local Plan contains no rational, reasonable or credible justification for building on the Green Belt as proposed. The National Planning Policy Framework (NPPF) requires any change of Green Belt boundaries to demonstrate exceptional circumstances, and the Local Plan neither demonstrates, nor discloses, any such exceptional circumstances. Unmet housing need is NOT an exceptional circumstance in law. It is clear, therefore, that the Green Belt boundaries should NOT be changed, and that this policy is flawed and should be amended.

In the last consultation just six individuals, out of the c. 7,000 of those who took part in the consultation, supported the policy. Another 20 comments of support were from organisations such as: the University of Surrey, local councils (including Guildford), consultants (e.g. Savills) or landowners. But of the 1,371 who commented on the green belt policy, 1,332 (97%) were against.

Over 70% of the proposed housing is planned for land currently in the Green Belt. Housing need is not a reason in law for protected Green Belt land being used. It is perverse for so much housing to be planned for the Green Belt. Clearly, the Green Belt has not been used as a constraint as clearly set out in Government advice, planning policy guidance, the NPPF, case law, election manifestos and Ministerial letters to MPs.

I object to the proposed removal of West Horsley from the Green Belt by insetting and extending the 2003 Local Plan Settlement Area boundaries, and no exceptional circumstances or other justification is made for this proposal. The Green Belt & Countryside Study is flawed and the Key Evidence document „Guildford Borough Economic Strategy 2013-2031” makes no case for locating large numbers of new homes in West and East Horsley or neighbouring villages. The number and density of housing proposed is not in keeping with the local area and is therefore against policies within the NPPF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/15953  
Respondent: 15627393 / Brandon White  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the removal of Send from the Green Belt because the village and its countryside provides a necessary space between Woking and Guildford.

I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford’s urban brownfield areas much closer to existing transport hubs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16072  
Respondent: 15631105 / Pamela Jacqueline Hagan  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to removing the green belt from its protected status (policy p2). I have extreme concerns for the urban sprawl that this will result in for the villages of Ripley, Send and Clandon. There is already an existing brown field site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16082  
Respondent: 15631201 / Harold Young  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We are writing to register our objections to the removal of Green Belt Protection from the area around the Villages of Chilworth, Shalford, Peasmarsh and others.

We are not unsympathetic to the need for more housing in this area but we do not agree with the prospect of ‘approved in principal’ as this would appear to relinquish any control over proposed development. We are also not happy that all 3 Villages are lumped together as no longer applicable for Green Belt Protection, whilst other parts of Guildford Borough are unaffected. On what grounds are these particular Villages to be ‘signed out’ for exclusion? Who decides and has anyone looked, in detail at, or visited this area.

If development is permitted, en-bloc, the eventual result would be a continuous built-up area of housing, linking the Villages of Albury, Chilworth, Shalford and Peasmarsh to Guildford Town Centre.

Fresh, new sites bring Applications from large Developers further afield. What we need are small, localised developments on empty Brown Field sites to be used first, using local Developers who are sympathetic to local needs, e.g. affordable housing.

We already have in excess of 500 new homes in Waverley at Cranleigh and there are proposals for using Dunsfold and Wisley as possible new Brown Field sites.
Do we really need more sites? We believe that control must be maintained to preserve our Green Belt; otherwise, parts of the south-east of England will become a concrete jungle.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16086  Respondent: 15631393 / Katie Waple  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I wish to object, most strongly, to the Council’s Green Belt policy in relation to the removal of Green Belt land for housing development. In particular I am concerned about the proposed release of the open fields known as Allocation Sites A38, A39, A40 and A41 in West Horsley. My objections are that the Council’s proposal is contrary to Government advice contained within the National Planning Policy Framework 2012;

   • Paragraph 79 states that “the Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence”.

   • Paragraph 82 states that “New Green Belts should only be established in exceptional circumstances”. Therefore if existing Green Belt land is sacrificed for housing, the quantum of Green Belt will reduce and will not be replaced.

   • Paragraph 83 provides “Once established, Green Belt boundaries should only be altered in exceptional circumstances. The Council has not demonstrated “exceptional circumstances” but states that the shortage of available housing land is an exceptional circumstance. The problem is that Green Belt land, which is not Previously Developed Land (PDL), should be regarded as sacrosanct and should only be released as a very last resort and after the re-use of Brownfield and PDL has been exhausted. GBC has made no real attempt to survey and review the availability of Brownfield and PDL but, instead, has targeted Green Belt land predominantly in single ownership, as this is easier to deliver. Good town planning is not about easy deliverability and knee-jerk solutions. This is “lazy” planning and should be rejected.

   • Paragraph 87 says “As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Insufficient “special circumstances” have been advanced by GBC to justify the release of previously undeveloped Green Belt, which still serves its original purpose as Green Belt land.

   • The proposal is also contrary to paragraph 88 of the NPPF, which states that exceptional circumstances will not exist unless the harm caused to the Green Belt is outweighed by other considerations. I do not agree that a shortage of housing land is to be considered as an exceptional circumstance but, even if I am wrong, the harm to Green Belt is not outweighed by other considerations.

   • Paragraph 89 states that a local planning authority should regard the construction of new buildings as inappropriate in Green Belt.

   • In summary the proposal to release Green Belt land is contrary to Government advice and there are, in fact, two distinct tests. Firstly GBC has to prove “exceptional circumstances” to change the boundaries of the Green Belt and secondly it has to prove “exceptional circumstances” to justify inappropriate development.

1. There is case law concerning “special circumstances” and, in particular, whether a housing shortage is a “special circumstance” of sufficient weight to justify the release of Green Belt. I list below the relevant synopsis;

   • In Hunston Properties Ltd [2013] EWCA Civ 1610; [2014] JPL 599, it was held that;
On the facts, the Inspector was obliged to find a housing shortfall. However, the weight to be given to such a housing shortfall (and whether it constituted “very special circumstances” for the purposes of NPPF 87) was a matter of planning judgment. The weight to be attached to the shortfall may, as a matter of planning judgment, be reduced where a shortfall is inevitable due to a district being subject to policies, which restrict development (such as AONBs, National Parks or Green Belts).

- Further it was held in R (Lee Valley Regional Park Authority) v Broxbourne Borough Council [2015] EWHC 185 (Admin) that;

“A shortfall in housing land supply can, as a matter of policy, be a very special circumstance, although the occasions when it is likely to suffice by itself to warrant the grant of permission for housing development in the Green Belt are expected to be few and far between”.

- The case of R (Luton Borough Council) v Central Bedfordshire Council [2015] EWCA Civ 537 it was stated that;

“...paras. 87-88 of the NPPF provide guidance regarding the approach to be adopted if there is a proposal for development of an area within the Green Belt set out in a local plan: “very special circumstances” have to be shown. This is a stricter test than that in para. 83 in respect of changing the boundaries of the Green Belt in the local plan.”

As can be seen none of the case law to date supports the development of new housing in the Green Belt.

1. There is no precedent for releasing existing Green Belt land where its original aims and functions are still being met. The original Green Belt legislation and particularly circular 42/55 only envisaged and to a limited scale the “infilling” and “rounding off” within the Green Belt and existing towns and villages should not be allowed to expand any further.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. Policy P2 – Green Belt: I **object** to this significant erosion of the Green Belt with the proposals for large towns being developed on Green Belt land thereby removing the openness of the Green Belt. I note in particular the huge developments proposed for the North East quadrant of the borough which will adversely affect our amenity, but also unfairly targets our tranquil rural villages because we can provide ‘dormitory’ facilities for commuters to London. The developments directly affecting our villages are the proposals for Wisley Airfield, Gosden Hill Farm, various farms and tracts in the Horsleys and Garlicks Arch at Send.

1. Further, on the erosion of Green Belt and I **object** that Policy P2 is not met where it states that Green Belt should be protected. I **object** to the disproportionate use of Green Belt land for housing – some 65% of the housing proposed is on Green Belt and with little consideration being given to redevelopment of brown field sites.

2. I **object** that GBC are contravening the NPPF framework stipulation in paragraph 87 with the proposed developments at Gosden Hill Farm, Ripley, East and West Horsley and Garlicks Arch, Send. Paragraph 87 states “As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.” and GBC have not proven any special circumstance for developing on these Green Belt areas.

3. I **object** to building on the Green Belt because the essential characteristic of Green Belt is its openness and permanence (National Planning Policy Framework paragraph 79).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
• Paragraph 87 says “As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Insufficient “special circumstances” have been advanced by GBC to justify the release of previously undeveloped Green Belt, which still serves its original purpose as Green Belt land.

• The proposal is also contrary to paragraph 88 of the NPPF, which states that exceptional circumstances will not exist unless the harm caused to the Green Belt is outweighed by other considerations. I do not agree that a shortage of housing land is to be considered as an exceptional circumstance but, even if I am wrong, the harm to Green Belt is not outweighed by other considerations.

• Paragraph 89 states that a local planning authority should regard the construction of new buildings as inappropriate in Green Belt.

• In summary the proposal to release Green Belt land is contrary to Government advice and there are, in fact, two distinct tests. Firstly GBC has to prove “exceptional circumstances” to change the boundaries of the Green Belt and secondly it has to prove “exceptional circumstances” to justify inappropriate development.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to removal of Send and other villages from the green belt. This can only be done in exceptional circumstances according to planning law, and none exist in this area. The interests of developers profiting from indiscriminate urban development are not exceptional circumstances.

Any weakening or exceptions to green belt protection will lead to its permanent loss. The green belt must be protected in its entirety, according to current law. It is the lungs of the densely populated south east, and an area that is enjoyed by millions, including valuable tourism from abroad.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1173  Respondent: 15632289 / Claire Belton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to removal or 'inset' from the Green-belt of Send and other villages throughout the Borough, or sections of land such as Send Business Park (Policy 2 at paragraph 4.3.15). This can only be done in exceptional circumstances, for which none exist. This practice is erosion of the Green-belt by stealth and must not be allowed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16253  Respondent: 15633217 / Emma Cooper  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Send, Ripley and the surrounding villages being removed from the Green Belt. Our MP promised to protect the Green Belt yet the local plan is proposing to remove 15 villages from the Green Belt, this is unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16186  Respondent: 15634113 / Joby Lees  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

My name is [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998]. I live in Peaslake. I work in Guildford and drive through Clandon every day to work. We've all lived in the area for many many years. It is a lovely place to live and we have enjoyed the scenery and the fact that there is so much Green Belt around meaning lovely spaces to enjoy. Even within these areas there has been a population increase over the years with of course an increase of houses cars etc. Which is inevitable. However it
has always been a relief knowing that whatever happens and however many houses are built, the Green Belt is safe and the area will not be destroyed as promised by the Conservative Party.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16200  Respondent: 15634145 / Annette Davies  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am emailing with regards to the proposed Guildford Local Plan to register my objection to this most horrific proposal which sets to destroy a substantial part of our Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16236  Respondent: 15636289 / Chris Holmes  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Incursions into the Green Belt - I believe this is wholly inappropriate. The green belt is so designated to provide support for our Wildlife which is already under great threat from habitat destruction from over-development and to preserve an environment that is also conducive to maintaining an acceptable quality of life - access to sufficient open spaces.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16261  Respondent: 15637633 / Scott Kent  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the large proposed development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16306  Respondent: 15639841 / May Craft  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
I write to OBJECT to the terms of your currently proposed Local Plan. I am an eight year-old pupil at The Raleigh School. I have grown increasingly frustrated and disappointed by the irresponsible behaviour of adults. As a result, I have set up my own action group with school friends, Future Thinkers. We are in the process of building a website intended to highlight the important issues where adults are behaving in an irresponsible manner towards the next generation and to also take action in the local community.

We have recently done a litter survey in one part of Kingston Meadow and found 105 items of rubbish strewn in the leisure area and the woods in just 300 metres. This demonstrates that the Council has its priorities wrong at present: you need to take action, in conjunction with the local police to both clean up and prosecute the criminals who leave litter before turning your mind to new development. You demonstrate your present irresponsibility as custodian of what you are currently responsible for: it is simply not feasible to give you responsibility to deliver further assets at this stage.

Loss of green belt land is irreversible and you must demonstrate exceptional circumstances on a case by case basis, not simply put out a case that development in other areas present practical difficulties: go and wrestle with those difficulties and deliver sustainable regeneration, rather than seek to build away the green lungs which are so vital for generations to come.

It is both unfair and irresponsible to seek the circumvent this central planning policy by simply re-zoning areas from green belt to outside of or inset into the green belt. Please think again.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16487</th>
<th>Respondent: 15639841 / May Craft</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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**No exceptional circumstances which justify development of the Green Belt**

GBC has, to date, failed to make the case that exceptional circumstances exist to justify any attack on the sanctity of the boundary of the Green Belt as it currently stands. Indeed, GBC seems to be adopting a position which is contrary to central government policy.

Those who have made a conscious decision to live in a village within the metropolitan Green Belt appreciate the constraints (and responsibilities) that places on its residents.

About Guildford (winter 2013, GBC) stated the importance of maintaining a continued sense of community and to recognise the distinct character of each of the villages within the borough. The status of much of the borough as metropolitan Green Belt land is fundamental to this, protecting the area from the encroachment of London from the north east and from Guildford itself as well. Accordingly, the process for the development of the local plan must be delivered with the protection of community and the environment at the forefront. To date, there is insufficient evidence that this has been done and there is insufficient consideration of the legacy we would create for our children if GBC’s proposed wide-scale development assault on the Green Belt is allowed to proceed.

Accordingly, I strongly advocate for East and West Horsley (and the other villages within the borough) to remain within the Green Belt and should not be removed from it. However, if there is a powerful case for the re-zoning of a particular field or fields for reasons which satisfy the high threshold set, that could be supported on a case-by-case basis. The provision of vital community infrastructure is a powerful example of where the sacrifice of a small piece of Green Belt land might become appropriate, provided that there is no other viable alternative.

**Loss of Green Belt Land is Irreversible**
As you have read in my earlier consultation response, to change the planning status of the Green Belt land around the metropolis and around Guildford would send a clear (and negative) message that the rural nature of our precious and beautiful county is not something for which we are simply custodians and which therefore requires protection. A continued development linking London to Guildford along the axis of the A3 would be unacceptable and is contrary to the objective of Green Belt designation.

We are all stewards of our community for the generations to come. GBC and its residents are part of the same joint endeavour. Your Local Plan proposals seem to wish to polarise opinion and cause separation and division where consensus and common purpose is required.

The Green Belt land in the east of the borough protects our most precious natural asset, the North Downs and Surrey Hills, in their true, undeveloped, context. We should be justly proud of being the most wooded county in England (much of it ancient) and do everything to ensure that this precious heritage is passed down to future generations.

We have much to thank former generation for in the protection of our county's countryside in a manner which has delivered a vibrant local economy, whilst protecting our heritage. Today, it is the responsibility of the current councillors and officers of GBC and its residents to ensure that the work of past generations is not for naught and that the special characteristics of our borough are maintained.

If the Green Belt status of vast swathes of the borough were removed, there is a genuine risk that it is only the SSSI/AONB areas that would be appropriately and sufficiently protected from development for the benefit of biodiversity and for our children and successive generations. It should be remembered that that Green Belt status assists GBC in its stewardship of the borough so as to protect the precious nature of the area, whilst also permitting sustainable, proportionate and sympathetic development. Green Belt status clearly identifies areas which are “off limits” for most development.

Loss of undeveloped land within the current Green Belt is irreversible and it is our collective social responsibility to ensure that this does not happen.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/16327  **Respondent:** 15640897 / Jackie van Heesewijk  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**I OBJECT TO ALL POLICIES INVOLVING BUILDING IN THE GREEN BELT:** • No “exceptional circumstances” shown, numbers excessive and the clearly expressed views of residents in previous consultations ignored.

**I OBJECT TO POLICY P2 (GREEN BELT):** • No declaration of support for protecting the Guildford Green Belt, contrary to NPPF and government statements. • No evaluation of value of local Green Belt as a public and private asset: it’s just treated as potential building land with a few inconvenient restrictions. • Impact of Green Belt development on local agriculture ignored. • Impact on rural leisure and tourism ignored. • Impact on flood control ignored. • Impact on carbon sink and knock-on effects for air pollution and climate change ignored. • Impact on biodiversity ignored. • Impact on natural heritage ignored. • Impact on water catchment ignored. • Impact on room for public space amenities (parks, cemeteries, waste facilities etc) ignored. • Impact on rural business (e.g. mineral mining, film making) ignored. • Impact on natural landmarks and views ignored. • Harm to public health and wellbeing (physical, psychological) ignored. • Allows excessive levels of development in breach of views expressed in last consultation and Conservative Party manifesto commitments at the last local elections. • Has allowed ruling Councillors to argue that there is an acceptable percentage of Green Belt that should be sacrificed to development, when no such rule exists in the NPPF. • Ignores alternative approaches, such as fair burden-sharing under which settlements would undertake to accommodate new development in proportion to their size. • Disproportionate amount of development (most of it, in fact) to be in Green Belt. Too few new homes in urban areas where most people (especially the young and less privileged) want to live. This
will act against much needed urban regeneration. • “Insetting” of most villages disproportionate and unjustified in terms of their contribution under the NPPF to the purposes of the Green Belt. Based on flawed Green Belt and Countryside Study. Idea that most Guildford villages do not contribute to “openness” is subjective. • Major settlement extensions allow indiscriminate housebuilding, as irregularly shaped villages are squared off to enclose green fields. • Overall harm to Guildford Green Belt unjustified by any objective development need post-Brexit. • Ignores most of NPPF 17 stipulations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16354  Respondent: 15641281 / Paula Redmond  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to not protecting the Green Belt (Policy P2)

I object to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16366  Respondent: 15641281 / Paula Redmond  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16378  Respondent: 15641441 / Orna Talbot  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
What are the exceptional circumstances that allow you to take away our green belt, our quality of living and compromise the access to services our son will have growing up?

I urge you to not race to the bottom and urge you to preserve what is good.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16420  Respondent: 15641441 / Orna Talbot  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

What are the exceptional circumstances that allow you to take away our green belt, our quality of living and compromise the access to services our son will have growing up?

I urge you to not race to the bottom and urge you to preserve what is good.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16380  Respondent: 15641505 / Annabella Goldsmith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The massive overdevelopment of 2000 homes at Gosden Hill Farm which is presently Green Belt and the 2000 proposed homes at Wisley Airfield which is also Green Belt land. Inappropriate and totally unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16383  Respondent: 15641569 / Trevalyn Gregory  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the large proposed development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16386  Respondent: 15641665 / John Savin  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The National Planning Policy Framework (NPPF) (March 2012) confirms, at Paragraph 79, that ‘The Government attaches great importance to Green Belts…. The essential characteristics of Green Belts are their openness and their permanence.’ The NPPF clearly sets out at Paragraph 80, the five main and longstanding objectives of the Green Belt, as follows:

• to check the unrestricted sprawl of large built-up areas;
• to prevent neighbouring towns merging into one another;
• to assist in safeguarding the countryside from encroachment;
• to preserve the setting and special character of historic towns; and
• to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Paragraph 83 of the NPPF states that: ‘Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.’

Having reviewed the information available, and the details of the Council’s proposals to remove the village of Send from the Green Belt and amend the Green Belt boundary, I consider that the Council’s approach is fundamentally flawed and that the proposed emerging local policy is at odds with National strategic planning policy, which should form the basis for policy formulation at the local level.

Furthermore, I consider that the Green Belt in this location continues to serve a purpose and fully meets the objectives originally identified for Green Belt designations, and in this instance:

• It checks the unrestricted northwards sprawl of Guildford, and eastward sprawl of Woking in particular;
• It prevents the merging of Guildford, Woking, Weybridge and Cobham in this area;
• It serves to safeguard land in the vicinity of the North Downs and land which is in a variety of rural and agricultural uses;
• It assists in preserving the historic character of the settlements in the area;
• The protection of the Green Belt assists in diverting development to more sustainable locations such as the built up areas of Guildford and Woking and other towns both within and outside of the Borough.

I consider that the Green Belt in this location still serves a strong purpose and that there is no over-riding justification for the release of land from the Green Belt in this location for development.

In terms of development in the Green Belt, the NPPF clearly states at Paragraph 87 that ‘inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances’. Paragraph 88 goes on to state that when considering any proposals for development Councils should ensure that substantial weight is given to any harm to the Green Belt. It also states that, ‘very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriate development and any other harm, is clearly outweighed by other considerations.’ In this instance, the need for housing or commercial development is not sufficient a very special circumstance to warrant development in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Local Plan Consultation comments

I am writing to lodge some objections to the 2016 Draft Local Plan ('the Plan'). This may be your job but please realise you are affecting real peoples’ lives. Real people you are here to serve. This is not a game although people in this field of practice seem to treat it as such, largely to make money for the unscrupulous I suspect. What do you not understand about the words “Green Belt”? I know the educational requirements for many professions have changed but this is a no brainer and Green Belt is Green Belt whichever way you read it!

Green Belt

I strongly object strongly to the proposed changes to the Green Belt Boundary to inset the named villages from the Green Belt (including Policies S1, S2, P2). All the villages should remain in the Green Belt.

A requirement for extra housing is not exceptional circumstances – build up the way or underground instead of taking more Green belt land. 89% of Guildford Borough is in the Metropolitan Green Belt. The Local Plan should have the protection of the Green Belt as its cornerstone. The Green Belt is intended to be permanent and its boundaries cannot be changed except in exceptional circumstances. You have shown no exceptional circumstances under the NPPF for the Green Belt boundary to be changed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16410  Respondent: 15644225 / Patricia Savin  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I write to lodge my strong objection to the Council’s proposal to amend the Green Belt designation in the northern part of the Borough in the vicinity of Send and also the proposals to allocate land for additional housing and commercial development in this area.

Green Belt

The National Planning Policy Framework (NPPF) (March 2012) confirms, at Paragraph 79, that ‘The Government attaches great importance to Green Belts…. The essential characteristics of Green Belts are their openness and their permanence.’ The NPPF clearly sets out at Paragraph 80, the five main and longstanding objectives of the Green Belt, as follows:

• to check the unrestricted sprawl of large built-up areas;
• to prevent neighbouring towns merging into one another;
• to assist in safeguarding the countryside from encroachment;
• to preserve the setting and special character of historic towns; and
• to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Paragraph 83 of the NPPF states that:

‘Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.’

Having reviewed the information available, and the details of the Council’s proposals to remove the village of Send from the Green Belt and amend the Green belt boundary, I consider that the Council’s approach is fundamentally flawed and
that the proposed emerging local policy is at odds with National strategic planning policy, which should form the basis for policy formulation at the local level.

Furthermore, I consider that the Green Belt in this location continues to serve a purpose and fully meets the objectives originally identified for Green Belt designations, and in this instance:

- It checks the unrestricted northwards sprawl of Guildford, and eastward sprawl of Woking in particular;
- It prevents the merging of Guildford, Woking, Weybridge and Cobham in this area;
- It serves to safeguard land in the vicinity of the North Downs and land which is in a variety of rural and agricultural uses;
- It assists in preserving the historic character of the settlements in the area;
- The protection of the Green Belt assists in diverting development to more sustainable locations such as the built up areas of Guildford and Woking and other towns both within and outside of the Borough.

I consider that the Green Belt in this location still serves a strong purpose and that there is no over-riding justification for the release of land from the Green Belt in this location for development.

In terms of development in the Green Belt, the NPPF clearly states at Paragraph 87 that ‘inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances’. Paragraph 88 goes on to state that when considering any proposals for development Councils should ensure that substantial weight is given to any harm to the Green Belt. It also states that, ‘very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness and any other harm, is clearly outweighed by other considerations.’ In this instance, the need for housing or commercial development is not sufficient a very special circumstance to warrant development in the Green Belt.

Furthermore, I believe that there are other suitable alternative sites within the existing built up areas of the Borough that would be capable of addressing the development needs of the Borough in a more sustainable manner without irreversible degradation of the Green Belt.

Until the Council can provide a reasoned, robust and fully justified case for the removal of green field land from the Green Belt, then I strongly object to any Green Belt land release in the area of Send and Ripley, and as a result I also therefore object by default to the sites identified for development at Garlick’s Arch, Clockbarn Nurseries, Send Hill, Wisley Airfield and Gosden Hill.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/16414  **Respondent:** 15644577 / John Cotton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I OBJECT TO any "in-setting" (i.e. removal) of any villages from the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/16466  **Respondent:** 15645057 / Julian and Clare Colborne-Baber  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
I wish to write regarding the proposed local plan such that my comments may be taken into account. I live in the village of West Horsley as you will be able to see from my address at the bottom of the email and as such my comments primarily relate to West Horsley.

Greenbelt:

My first objection to the Local Plan relates to the protection of the Greenbelt. I am absolutely opposed to the removal of some of the village from the Greenbelt through the extension of the settlement boundaries and the insetting. No Exceptional Circumstances or other relevant justification has been demonstrated to justify the new Greenbelt boundary in West Horsley. National planning policy requires that Green Belt boundaries are only amended in exceptional circumstances and that this must be undertaken as part of the Local Plan process. As such the proposal and Policy P2 is not in line with National Planning Guidelines. It is clear to me that it cannot be considered exceptional in order to facilitate the development put forward when a) The Guildford Borough Economic Strategy 2013-2031 makes no case for locating large numbers of homes in West Horsley (or neighbouring villages) (indeed the new economic development sites are located on the other side of the borough to West Horsley) and b) when the current proposals have given insufficient consideration of the use of brownfield sites within the borough (located much nearer centres of employment and supporting infrastructure). This is a key flaw in the Guildford Borough Submission Local Plan 2016 – proposing extensive development in locations remote from areas of employment and supporting infrastructure. The new housing should largely be allocated much nearer and around Guildford’s town and urban areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<thead>
<tr>
<th>Comment ID: PSLPP16/16510</th>
<th>Respondent: 15645825 / David Roberts</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>I object to all erosion of the green belt.</td>
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<td>I object to the “in setting” of any villages from the green belt as these villages are crucial to our rural way of life and building on the scale planned would destroy village life as we know it today.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<tr>
<th>Comment ID: PSLPP16/16551</th>
<th>Respondent: 15647265 / Keith Grainger</th>
<th>Agent:</th>
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<tbody>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>I object to the draft local plan on the following basis:</td>
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<td><strong>1. PROTECTING OUR GREEN BELT</strong></td>
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<td>There are no exceptional circumstances to justify the removal of East and West Horsley from the green belt. The green belt exists to protect the country environment of these historic villages for current and future generations.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<tr>
<th>Comment ID: PSLPP16/16627</th>
<th>Respondent: 15649345 / Matthew Sarti</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>1. I OBJECT to altering the green belt boundaries. Para 83 NPPF states green belt boundaries can only be altered in exceptional circumstances and where there is local support. Meeting the housing need is not exceptional circumstances. This has recently been reiterated by Central Government. No exceptional circumstances have been demonstrated.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<tr>
<th>Comment ID: PSLPP16/16875</th>
<th>Respondent: 15649601 / Laura Bushnell</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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</table>
I strongly object to Policy P2 on the Green Belt. I am extremely disappointed to hear that my local area, Horsley, as well as many surrounding villages will be removed from the Green Belt. The primary reasoning behind the greenbelt land is to **prevent further urbanization** surrounding large centres for many reasons, including environmental as well as economic. Near continuous urban sprawl stretches from the City of London to Effingham Junction already, so it seems only reasonable to conclude that with the proposed rate of development and removal of Green Belt protection that this will only keep spreading. Is there other land elsewhere that is to be added to the Greenbelt to be protected from this creeping urbanization? Or will the Greenbelt simply shrink until it no longer exists? When will the people living in that land get to the time when they will have to write objections, as I am now, to protect and save their local area?

Indeed, the Green Belt constitutes **89%** of the borough and should be the foundation of all local planning policy, yet support for it is half-hearted at best. It is not only beneficial to our borough but to Londoners and the country too, so it is important to consider the wider consequences as well. **Once it is gone, it is gone forever.**

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/16709  **Respondent:** 15649825 / Chris Howes  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- I oppose unjustified Green Belt development.
- It is irresponsible to squander every last resort greenfield site in a single Plan, robbing future generations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/16726  **Respondent:** 15649889 / Alan Hughes  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Green Belt

Most of the aspirational development on this draft plan are in Green Belt and no justification to change the existing area has been made.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/16727  **Respondent:** 15649889 / Alan Hughes  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I would like to see more brownfield sites used for homes in the town centre and not a focus on retail.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16746  Respondent: 15650017 / Scott James Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I would like to formally object to the removal of green belt protection from a number of villages in the Guildford area, as proposed in the Guildford Local plan 2016.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16767  Respondent: 15650369 / Stephanie Dean  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY P2 – Green Belt

I object to this policy for the following reasons:

1. It does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local Planning policy. The Green Belt is not the Council’s to give away and once it is gone, it is gone forever. Sacrificing areas of the Green Belt to a developer-influenced growth agenda is a betrayal of future generations and does not constitute sustainable development. Green Belt was last taken in the 2003 Plan and now it is again proposed to move the boundaries.

1. The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the Plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

1. Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

1. The Countryside Study was a simplistic exercise based on the erroneous principle that ranking Green Belt land would identify candidates for development. The Council has not carried out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban
sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

1. I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process, many of these villages do contribute to the openness of the Green Belt (a term which neither the Plan nor the NPPF defines) and there is no need to inset them. I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling, and that infilling is also proposed outside the settlement boundaries of a further 11. In effect, each village will become a nucleus for further development. The NPPF’s other four tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development.

1. To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead. This policy is wildly disproportionate in terms of any foreseeable development need and has caused intense opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

1. Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” This is misleading. Since the Second World War, Guildford has been expanding to the north east, starting with the Bushy Hill estate in the 1950’s, then Merrow Park and Weybrook Park were built on around 100 hectares of Green Belt land in the 1980’s, and now 89 hectares of land from the adjacent Gosden Hill Farm is also to be taken out of the Green Belt. This will connect to the proposed Garlick’s Arch development (30 hectares), also in the Green Belt, via several slip roads and feeder roads alongside the six-lane A3 (a further 4.5 hectares). If allowed, these two proposals will more than double the area of Green Belt land hitherto removed to enlarge Guildford’s NE suburbs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16785  Respondent: 15652513 / Jordan Heasman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing because I OBJECT to any REMOVAL OF VILLAGES FROM THE GREEN BELT.

I hope all the emails you will inevitably receive will do something to make you take notice of the negative public opinion of your development plans in this green belt area

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16798  Respondent: 15652833 / Don Babington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to not protecting the Green Belt (Policy P2)
I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16823  Respondent: 15653505 / Dave Robins  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO all erosion of the Green Belt. Once we use this for building it will be lost forever. There are plenty of Brown Field sites to be built on first before using the Green Belt. The Green Belt is a buffer between Woking and Guildford

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16825  Respondent: 15653505 / Dave Robins  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO any “in-setting” (i.e. removal) of any villages from the GREEN BELT

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16879  Respondent: 15657057 / Frances Turner  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY P2 GREEN BELT
I object to Policy P2 green belt. This policy states, “the general extent of the Green Belt has been retained.” This is completely false. The policy wording is weak in support of the Metropolitan Green Belt even though the latter forms 89% of the borough and should be the cornerstone of all local planning policy. Policy P2 completely fails to appreciate the importance and permanence of the Metropolitan Green Belt and it needs to be permanently protected. The boundaries of the Green Belt through Guildford Borough were defined in the 1987 Local Plan, forming part of a 19-24km concentric belt around London. The Green Belt is intended to check the unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and other urban land. The principles of the Green Belt designation were outlined within Planning Policy Guidance 2: Green Belts (PPG2) and are found within the National Planning Policy Framework (NPPF). Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital.

As a matter of law and national and local policy, these assets should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultations.

It is quite incorrect to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold.

I object to the “insetting” of 14 villages from the Green Belt, and at “infilling” 12 of the borough’s Green Belt villages. I am disturbed that settlement boundaries are to be hugely extended in many villages and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages reflect the effect of ribbon development (often along just one side of existing roads) permitted between the Wars. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development. I believe this policy is based on a flawed Green Belt and Countryside Study.

To “inset” two thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, although they would quickly destroy them if the proposed “insetting” and boundary extensions go ahead. This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions. Send is a good example of villages that should not be removed from the Green Belt. Send provides an important Green Belt buffer between Woking and Guildford. The village and the countryside behind the A247 should all be protected.

I object to three particularly vulnerable areas of high quality amenity land being taken out of the Green Belt around Send which include:

- The land behind the schools including playing fields and woodland.
- The land to the right of Cartbridge by the River Wey Navigation up to the new boundary fence with Vision Engineering.
- Land to the left of Cartbridge going up to the old depot on the Wey Navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/566  Respondent: 15657057 / Frances Turner  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Policy 2 paragraph 4.3.15 green belt.

I object to the proposal to inset Send Business Park from the green belt. The business park fronts the River Wey navigation which is acknowledged as protected corridor. The business park is an historical accident arising from a former historic industrial use. Tannery Lane is too restricted for any increase in traffic and the business park should remain within the green belt to inhibit further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy P2 – In our response to the 2016 version of the plan, we suggested that it would be helpful if the intended removal of some strategic sites and the proposed extension of Green Belt around the Ash and Tongham area were explicitly referred to in the policy as well as in the supporting text. We note that this suggestion has not been taken up.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<thead>
<tr>
<th>Comment ID: PSLPP16/16952</th>
<th>Respondent: 15658465 / Michael Cuell</th>
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</table>

The plans for development in the Ripley, Send, Pyrford area are an outrage. They will destroy protected green belt and diminish the quality of life in the area by adding to traffic congestion, pollution, degradation of the environment, and overwhelming strain on existing public services.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/16990</th>
<th>Respondent: 15661761 / Rob Harris</th>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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</tbody>
</table>

Removal of greenbelt status.

Regardless of the target housing number required, there are still inadequate “exceptional circumstances” to justify removal of the Green Belt status from any areas of the Borough.

Consideration should be given not only to the next planning period, but also to the rest of the century. At this rate of development, the Borough will be largely built upon within the lifetime of children born this decade. This is an unacceptable situation that should be resisted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/17005</th>
<th>Respondent: 15662305 / Debby Hallett</th>
<th>Agent:</th>
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</table>

I object to the draft Local Plan because it calls for housing development in the Green Belt. In order to change Green Belt boundaries, there must be demonstrated special circumstances. In order to develop in the Green Belt, there must be exceptional circumstances.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Green belt area

The area is designated Green Belt, and the proposed local plan is non-compliant with the National Planning Policy Framework as the very special circumstances for building on Green Belt have not been met.

The green belt area is the defence from greater London urban area encroaching on the surrey country side and protecting the surrey hills area of outstanding natural beauty.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

West Horsley is defined by Guildford Council as a Green Belt Village

Policies in the Governments National Planning Framework (NPPF) require that new building is regarded as inappropriate in the Green Belt.

These Policies also say that only limited infilling with Housing is appropriate.

Neither of these policies support substantial new development in the green belt.

The Councils Proposals total some 500 new dwellings in the green belt which is clearly contrary to the above policies.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Whilst there is general support for the aims of this proposed policy, given the high prevalence of Green Belt within the borough and the comments referred to in Policy S2, it is considered that in order to support further long-term growth needs, it should not rule out a suitable review mechanism in the future. In the event that any sites proposed in this document were to stall or fail to come forward for any reason there needs to be an effective tool in which to review the Green Belt boundaries.
It is also critical at this point to support the message within paragraph 4.3.16, which states that ‘we (GBC), consider that exceptional circumstances exist to justify the amendment of the Green Belt boundaries in order to facilitate the development that is needed and promote sustainable patterns of development.’

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17112  Respondent: 15666625 / Anna Ruddy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick's Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a 'special circumstance' and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC's Green Belt & Countryside Report does not address Garlick's Arch, so there is no evidence base to support including this site.

Rather than developing Garlick's Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17135  Respondent: 15666945 / Julian Dickinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

As a resident of West Clandon I am writing to object to Guildford Borough Councils 2016 Draft Local Plan. In itself the proposal to develop on land that is designated as Green Belt and as such intended as a buffer against the increasing pressures from ‘urban sprawl’ is of significant concern. It sets a dangerous precedent from which there would be no going back. If areas of Green Belt land are now so readily considered for development, what would be next, ‘Conservation Areas’?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We consider that the following points also justify either allocation or safeguarding of the site for housing:

- Restrict the ability of the Borough to meet its objectively assessed housing needs into the future.
- The result of this is/will be to place further reliance on less sustainable options elsewhere within the Borough and/or the Green Belt boundary in this location is justified and consider that the assessment of the Land Parcel K3 to be flawed.
- Restricts the Borough’s ability to provide for future needs in a sustainable way. We do not consider that a change to the higher end of those main urban edge parcels identified for PDAs as indicated at Appendix 6.
- To therefore seek to impose Green Belt designation here within the Proposed Submission Plan is considered unjustified at the region of 572 dwellings. The PDA scored 11.43 against the sustainability credentials and would therefore be ranked at the higher end of those main urban edge parcels identified for PDAs as indicated at Appendix 6.

An Addendum to the Green Belt and Countryside Study was prepared in April 2014 to address criticisms of the original Study. The Addendum updated the Environmental Capacity Analysis undertaken within Volume II and that undertaken in connection with additional urban edge parcels with a clear connectivity to the existing urban edge boundaries which were not previously considered beyond Green Belt purposes. Two additional land parcels were considered: Land Parcel J1, Land at Liddington Hall Farm and Land Parcel K3, Land south of Poyle Road, Tongham. With regard to Land Parcel K3, the Addendum states at paragraph 4.10 that: ‘Significantly, the parcel does not lie within the Green Belt at present, and is instead designated as lying within Countryside beyond the Green belt, in the Local Plan’. It goes on to state at paragraph 4.11 that: ‘a PDA across the entirety of the parcel would be inappropriate and an area has instead been identified to the north of the parcel. The PDA relates to Poyle Road, and incorporates land either side of the recreation ground and a woodland block.’ And at paragraph 4.12 that: ‘The PDA covers an area of approximately 24ha and could accommodate in the region of 572 dwellings. The PDA scored 11.43 against the sustainability credentials and would therefore be ranked at the higher end of those main urban edge parcels identified for PDAs as indicated at Appendix 6.’

To therefore seek to impose Green Belt designation here within the Proposed Submission Plan is considered unjustified and restricts the Borough’s ability to provide for future needs in a sustainable way. We do not consider that a change to the Green Belt boundary in this location is justified and consider that the assessment of the Land Parcel K3 to be flawed. The result of this is/will be to place further reliance on less sustainable options elsewhere within the Borough and/or restrict the ability of the Borough to meet it’s objectively assessed housing needs into the future.

Additionally we consider that the following points also justify either allocation or safeguarding of the site for housing:

- Landscape evidence previously submitted to the Council (attached) has demonstrated the suitability of two parcels of land to be accommodated in this location without harm to the wider landscape. Whilst development would be visible from the south, the evidence noted that new development would be seen in the context of the existing urban edge of Tongham beyond. Reinforcement planting along the southern edge of the two development parcels was considered a suitable mitigation measure by the landscape consultants fabrik;
- We oppose the views raised that the area should be designated as Green Belt in order to prevent southward and eastward encroachment of Tongham towards the A31. As the landscape evidence previously submitted to the Council demonstrates, there are alternative options available which would enable more development to be sustainably delivered at Tongham, whilst also preventing continued development southwards towards the A31. The landscape plan re-provided at Appendix 1 of our representation outlines an area between the potential housing areas B and C and the A31 which should remain open. It is considered that this area of land could be used for public open space which would provide long-term protection along the southern edge of Tongham and positive implications for the AONB.

Paragraph 82 of the NPPF highlights that the general extent of Green Belts across the country is already established. Additionally it advises that:
“New Green Belts should only be established in exceptional circumstances, for example when planning for larger scale
development such as new settlements or major urban extensions. If proposing new Green Belt, local planning authorities
should:
- demonstrate why normal planning and development management policies would not be adequate;
- set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary;
- show what the consequences of the proposal would be for sustainable development;
- demonstrate the necessity for the Green Belt and its consistency with Local Plans for adjoining areas; and
- show how the Green Belt would meet the other objectives of the Framework.”

We do not consider that the area of new Green Belt proposed meets the NPPF tests above. Equally, having reviewed the
supporting text of Policy P2 Green Belt, we note at paragraph 4.3.17 that the plan has not sought to make any
justifications against these tests and in this respect it is of note that the Green Belt and Countryside Study Volume II
Addendum reassessed the northern part of Land Parcel K3 as suitable for a Potential Development Area (PDA), (the
southern area being covered by AONB ad therefore not suitable for major development). In drawing the conclusion that
the PDA ranked at the higher end of those main urban edge parcels identified for PDAs, it acknowledged that an area of
24ha could accommodate in the region of 572 dwellings. Suitable mitigation could be delivered to offset any impact on
nearby areas of ancient woodland, the setting of nearby listed buildings, the SNCI to the east. The potential for
enhancement of planting along the southern edge to assist with an appropriate relationship with the AONB further to the
south on the Hog’s Back would be beneficial.

It is noted that the scoring at Appendix 1 of Volume II Addendum is wrong in relation to Land Parcel K3 which has not
been updated with the reassessment. Sensitivity of this area should therefore be reduced from High Sensitivity to
Medium Sensitivity.

Notwithstanding this, it is difficult to see how the Council would demonstrate why normal planning policies would not be
sufficient to continue to maintain a degree of separation between Tongham and the A31 particularly in the light of the
existing AONB designation to the south of this Land Parcel. Indeed, our clients SHLAA submission and supporting
landscape evidence, provides the Council with a very logical alternative to secure land in this location in perpetuity
(attached as Appendix 2).

In addition to the above, it is clear that the proposal to designate Green Belt in this area has clear consequences for
sustainable development. The Council’s Issues and Options Paper highlighted the potential at Land Parcel K3 “to carry
out further research to see if there may be some small potential development areas”. The Green Belt and Countryside
Study also subsequently determined that the area should be considered as a potential development area scoring 11.43
against the sustainability credentials and therefore ranked at the higher end of those main urban edge parcels identified for
PDAs.

Clearly, in designating this area as Green Belt, any subsequent release would only be able to be altered in exceptional
circumstances, through the preparation or review of the Local Plan (NPPF, Paragraph 83). This indicates why decisions to
designate new Green Belt should be a last resort. We do not feel that “exceptional circumstances” can therefore be
demonstrated here and no new Green Belt designation should be envisaged.

Additionally we do not support the Council’s view that the land would serve the five purposes of Green Belt identified in
the NPPF, Paragraph 80. We consider each of these in turn below. We also provide a copy of our Landscape and Visual
Rebuttal Statement (LVRS) on Parcel K3 (November 2013) (Appendix 3) which we have previously submitted to the
Council.

Unrestricted Sprawl

Unrestricted sprawl would be very unlikely to the south of Tongham as the land does not form part of an open area of
countryside moving southwards. This is on the basis that it is significantly restrained to the south by the A31, which
forms a defensible boundary thus preventing sprawl. Furthermore, to the south, the AONB already provides a significant
planning constraint which is afforded great protection by the NPPF and would essentially restrict development moving
too far southwards towards the A31 without the potential for unacceptable levels of harm to arise. Additionally, the
LRVS on page 23 also responds to Volume II of the Green Belt and Countryside Study, outlining that the consensus that K3 would ‘check the southward sprawl of Tongham’ is not consistent with comments against the neighbouring parcel of K2 which identifies that land as a Proposed Development Area.

**Coalescence**

We do not consider that the proposed area of Green Belt would have a significant ability to prevent the coalescence of settlements. The potential development areas outlined within the LRVS (areas B and C) demonstrate how a development area can be established in this location, to accord with the eastern extreme of existing development at Tongham. As Figure 5.1 of the LRVS demonstrates (Appendix 1), this enables a large band of landscaping to be maintained between Tongham and Ash Green, as well as between Tongham and the A31. Whilst the settlement of Seale falls literally to the south of the A31, we consider it absurd to raise concerns that any development at K3 would have an impact in terms of coalescence with Seale.

The LRVS on page 23, responds in detail to this concern. Firstly, it is noted that the Green Belt purpose relates to the issue of towns merging, which in this case is irrelevant on the basis that Tongham is a village and Seale, a small cluster of development. In any event, the separation caused by the dramatic changes in site levels associated with the ridgeline caused by the A31, means that there is both physical and visual separation between the settlements to prevent coalescence. Additionally, as outlined under our consideration of sprawl above, the AONB to the south of Tongham, also restricts the extent to which development could extend southwards. For coalescence to occur, development would therefore have to extend into the AONB and onto higher levels of land adjacent to the Hogs Back to result in physical or perceived coalescence of the two settlements.

**Safeguard Countryside from Encroachment**

The proposed area of new Green Belt in our view has little purpose and by virtue of its surroundings would only be capable of preventing development extending southwards from the existing urban edge of Tongham. As outlined under our ‘unrestricted sprawl’ section above, the land to the south of Tongham is not located within open countryside, as experienced to the east. To the south the A31 acts as a defensible boundary in preventing encroachment into the wider countryside south of the A31, whilst AONB provides further protection of the countryside. Additionally, we have highlighted how there are other opportunities to secure the long term protection of land within this area via other planning policies and through SANGS associated with some residential development at the settlement edge. The need to designate new Green Belt in this location is not therefore supported by this Green Belt purpose.

The LRVS also concluded on page 23 that whilst currently undeveloped, K3 had the potential to include significant areas of new Green Infrastructure, which would maintain the immediate landscape settings to the AONB designation, whilst also providing a new area of landscape that could provide a new area of open space resource for the town. As the NPPF in any event seeks to support the use of areas of Green Belt for leisure purposes and see the countryside utilised more for recreation, we consider that our client’s proposals, do not vary significantly to the Council’s intentions to safeguard countryside. However, it should clearly be preferential to secure any development which can also be accommodated in the location without harm.

**Setting and Special Character of Historic Towns and Assist in Urban Regeneration**

We do not consider that the new area of Green Belt proposed would reflect these purposes on the basis that Tongham is not recognised in the study as a historic town.

**Conclusion of the Five Purposes of Green Belt in Response to Land Parcel K3**

In light of our appraisal of the five Green Belt purposes and findings of the additional landscape evidence provided to the Council in respect of the site, we continue to advocate that it is inappropriate and unwarranted to seek to allocate Parcel K3 as new Green Belt. We strongly request that the advice contained within Paragraph 82 of the NPPF is applied to the proposal. This would demonstrate that there are alternative approaches available which could be secured through normal planning policies, that there is no necessity for Green Belt in this location and that there would be an adverse impact on the delivery of sustainable development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<td>The loss of green belt in the surrounding area - it's gone forever.</td>
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<td>Our Green Belt is precious. It is what protects London from urban sprawl; it preserves air quality; it prevents flooding. It is for us to conserve and protect it. There are 5 legal purposes for Green Belt:</td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td>Attached documents:</td>
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<td>• To check the unrestricted sprawl of large built up areas</td>
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<td>• To prevent neighbouring towns merging into one another</td>
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<td>• To assist in safeguarding the countryside from encroachment</td>
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<td>• To preserve the setting and special character of historic towns</td>
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<td>• To assist in urban regeneration by encouraging the recycling of derelict and other urban land.</td>
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<td>I object to the overdevelopment of sites particularly those outside the urban area</td>
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I object to the insetting of villages from the greenbelt. This is not necessary. There is plenty of suitable land in the urban area which needs to be regenerated rather than left to degrade further.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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Section 4.3: Protecting Policies; Policy P2: Green Belt

The NRA note paragraph 4.3.11 reflects the NPPF in stating that the main aim of Green Belt is to prevent urban sprawl by keeping land permanently open.

Paragraph 4.3.12 states that historically all the villages in the Borough, except Ash Green, and major previously developed sites have been washed over by the Green Belt designation. The text then correctly confirms that the NPPF states that only those villages whose open character makes an important contribution to the openness of the Green Belt should be included within it. Those that do not should be inset, or removed, from it and other development management policies used to restrict any inappropriate development.

Paragraph 4.3.13 provides a list of villages which under LP1 will now be inset from the Green Belt.

Paragraph 4.3.14 follows and clearly states that although not villages, a similar approach is to be applied to major previously developed sites in relation to whether they should remain washed over or be inset from the Green Belt. Again the paragraph correctly reiterates that the NPPF requires that land which it is unnecessary to keep permanently open should not be included in the Green Belt. If major previously developed sites are of sufficient scale and do not possess an open character, it is not considered necessary for them to remain within the Green Belt.
Paragraph 4.3.15 goes on to list the major previously developed sites (MPDS) which will become inset from the Green Belt under LP1. These are: Henley Business Park, HM Prison Send, Keogh Barracks, Mount Browne, Pirbright Barracks, Pirbright Institute and the University of Law Guildford.

The NRA do not object to the insetting of any of these MPDS from the Green Belt. However, the NRA are entirely concerned, and disappointed, by: 1) the omission of Bisley Camp from the list of major previously developed sites within the Borough set out by paragraph 4.3.15; and 2) the according omission of Bisley Camp’s developed land area as being inset from the Green Belt and shown to be so on the proposals maps of LP1.

As the Council will recall, in response to the consultation on the DLP in late 2014 the NRA submitted representations on the findings of the Council’s Green Belt and Countryside Study (GBCS) which comprised, and still does, part of the evidence base upon which the new local plan and its policies are being developed. It is not our intention to fully reiterate the content of the representations made in response to the DLP in response to LP1. A copy of the complete submission is however included at Appendix 1 of this submission for ease of reference and we invite the Council to review it again as a comprehensive element of the NRA’s submission to LP1, specifically in regard to the content under the section heading ‘Assessment of the Evidence Base’.

As currently written, whether by intention or otherwise, the NRA are concerned that between the consultation on the DLP the potential, and correct, status of the developed area of Bisley Camp as a MPDS has now been withdrawn by LP1. This is sincerely disappointing given the comparable similarities identified for the Council within the NRA’s representations made in response to the DLP, specifically regarding the developed area of Bisley Camp and Henley Business Park and The University of Law. The NRA consider that the status of these sites as MPDS support the basis for recognising and establishing Bisley Camp as a MPDS within LP1; and equally for Bisley Camp to be removed from the Green Belt also.

Accordingly, the NRA would like to see paragraph 4.3.15 amended to include Bisley Camp as a specified major previously developed site. The NRA also consider that the boundary of Bisley Camp’s MPDS should be drawn on the LP1 proposal maps to the extent shown on the drawing attached as Appendix 2 of this letter.

The NRA also note that beyond the reference to MPDS within paragraph 4.3.15 LP1 does not contain any other policy concerning MPDS. Having spoken with members of the Council’s Policy Team we have been advised that, at this time, it is the intention that a specific policy or set of policies relating to MPDS’s will be brought forward as part of the future Local Plan 2: Development Management Policies (LP2). It is considered this approach is less than ideal for the NRA and Bisley Camp. Firstly, although a MPDS policy could conceivably be delivered via the LP2 given the purpose and intent of MPDS status and its implications it is considered that this matter should be addressed as part of the LP1. MPDS are strategic policy designations and their designation and policy context should be developed and assessed accordingly. Indeed, as currently written in LP1 it would appear that this is what the consequence of paragraph 4.3.15 and the proposals maps are already establishing. The omission of Bisley Camp as an inset MPDS within LP1 is therefore failing to support the future regeneration and potential sustainable growth of the camp as a significant contributor to the leisure and tourism industry within the Borough. This would be contrary to paragraph 28 of the NPPF and likewise to the Council’s own stated spatial vision.

The NRA would also acknowledge the Council’s current LDS sets out the timescale for delivery of LP2 which is due to commence with evidence gathering from September 2017. Final adoption of LP2 will subsequently follow, after intervening consultation stages, in late 2018/early 2019. LP2 is clearly someway from the present and this further increases the importance to the NRA of the appropriateness to define the status of Bisley Camp as a MPDS (whether within or inset from the Green Belt) as part of LP1.

In summary conclusion, the NRA consider Bisley Camp should be allocated as an inset major previously developed site. Insetting the site would not conflict with the purposes of including land within the Green Belt (as defined by Paragraph 80 of the NPPF) and, on balance, there is no reason why sufficient defensible boundaries (in compliance with Paragraph 85 of the NPPF) should not be identified. In this regard the NRA would welcome further dialogue with Officers of the Policy Team to discuss and provide additional boundary information. Furthermore, as identified in paragraph 20.8 of the GBCS, if major previously developed sites are not considered appropriate for insetting and are to remain washed over within the Green Belt this implies the open character of the site makes an important contribution to openness. This in turn implies there is limited opportunity to redevelop, or expand the site, without detracting from the openness of the Green Belt. It is evident from an objective assessment of the major developed area at Bisley Camp that the land does not make such an important contribution to the openness of the Green Belt nor does it in landscape character terms as identified in the Council’s own Landscape Character Appraisals. It is also evident that Bisley Camp exhibits comparable
features with other major previously developed sites in the Borough that are proposed to be inset from the Green Belt and are stated as such within paragraph 4.3.15 of LP1.

The NRA generally support the wording of Policy P2.

However, the 4th bullet point of paragraph 89 of the NPPF clearly states the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces is one of the stated exceptions whereby the construction of a new building need not be considered inappropriate. Nowhere within the NPPF is it stated or implied that new buildings must also be sited on or close to the position of the existing building.

The inclusion of this requirement within Policy P2 is therefore entirely unnecessary, unduly restrictive and fails to accord with the corresponding Green Belt policies of the NPPF. The inclusion of this requirement within Policy P2 is also unqualified within the supporting text to justify why such a specific additional policy requirement should be included within the Borough’s development plan.

The NRA would therefore support an amendment to Policy P2 so that it reads:

‘…Proposals will be permitted where they are consistent with the exceptions listed in national planning policy and, where relevant, also meet the following criteria:…

Replacement buildings
The replacement of a building, provided the new building:

- Would be in the same use, and
- Is not materially larger than the one it replaces, and
- Is sited on or close to the position of the existing building, <strikethrough>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Respondent: 15674689 / Chris Baker</th>
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<td>I object to not protecting the Green Belt.</td>
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<td>I object to removing Ripley, Send and East and West Horsley from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). In my view there are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.</td>
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<td>I write to offer my strongest objections to the proposed new housing as detailed in the Council’s above plan.</td>
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The proposals are in direct conflict with most of the points in Section 9 of the National Planning Policy Framework which makes it very clear that Green Belts are to be protected. There has been no case made by the Council for the “exceptional circumstances” that are required to remove land from the Green Belt. I’m sure that Guildford Borough is aware if this government document, but as a reminder here is a link to the Green Belt guidance:


The proposed “insetting” contradicts the Plans own policy P2 which states that “We will continue to protect the Metropolitan Green Belt against inappropriate development”. It is absurd that the council considers high density housing developments in Horsley as consistent with policy P2. The proposals even contradict the Guildford Borough Economic Strategy 2013-2033 which makes no case for large numbers of new homes in Horsley or surrounding villages.

The infrastructure of the two Horsley’s is already at capacity in terms of drainage, schools, shopping, parking, bus transport, traffic flow, station parking and medical facilities. The Plan does not address or even acknowledge the need for infrastructure improvements. Indeed, even if there were clear infrastructure plans, where would these new facilities be located if not at the loss of yet more Green Belt land?

As a resident of West Horsley, I know that the idyllic rural character of both the Horsley’s would be destroyed forever. I moved here from London specifically because of its rural, countryside character and the threat of having this ruined is horrifying to me and my neighbours. To expect West Horsley to absorb a 35% increase (the highest in the borough) in houses, population and the resultant impact on already stretched infrastructure is unwise, unworkable and contrary to published planning guidelines and I therefore urge the Council to withdraw the plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17379   Respondent: 15682305 / Monika Mundy   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Settlement Boundary which has been imposed on East Clandon without any consultation. This imposition provides no protection to further development outside of the settlement boundary (Policy P2 para 4.3.25) and I deem as being unnecessary in an already tightly developed ancient and rural conservation village with high archaeological potential. I demand that this proposal be removed as it will endanger the openness of the Green Belt, the views in and out of the AONB (protection of the AONB Policy P1) and the character of our village.

Policy P2 – Green Belt: I object to this significant erosion of the Green Belt with the proposals for large towns being developed on Green Belt land thereby removing the openness of the Green Belt. I note in particular the huge developments proposed for the North East quadrant of the borough which will adversely affect our amenity, but also unfairly targets our tranquil rural villages because we can provide ‘dormitory’ facilities for commuters to London. These developments directly affecting our villages are the proposals for Wisley Airfield, Gosden Hill Farm, various farms and tracts in the Horsleys and Garlicks Arch at Send.

Further, on the erosion of Green Belt and I object that Policy P2 is not met where it states that Green Belt should be protected. I object to the disproportionate use of Green Belt land for housing – some 65% of the housing proposed is on Green Belt and with little consideration being given to redevelopment of brown field sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17384   Respondent: 15682305 / Monika Mundy   Agent:
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<tr>
<td>I object that GBC are contravening the NPPF framework stipulation in paragraph 87 with the proposed developments at Gosden Hill Farm, Ripley, East and West Horsley and Garlicks Arch, Send. Paragraph 87 states &quot;As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.&quot; and GBC have not proven any special circumstance for developing on these Green Belt areas.</td>
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<tr>
<td>Protecting Policies: The Protecting Policies Pl &quot;AONB&quot;, P2 &quot;Green Belt&quot; and P3 &quot;Countryside&quot; are supported.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>I object to not protecting the Green Belt (Policy P2)</td>
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<td>I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.</td>
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<td>The Plan should develop the existing brownfield site at Burnt Common rather than developing Garlick’s Arch (A43).</td>
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<td>I object to Policy P2 green belt</td>
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This policy states, “the general extent of the Green Belt has been retained.” This is a misleading statement.

The policy wording is weak in support of the Metropolitan Green Belt even though the latter forms 89% of the borough and should be the cornerstone of all local planning policy. It is precious beyond the short-term demands of the present Government’s policy or a 15-year local plan. As noted under Policy S1 above, it is a solemn legacy to future generations – an asset and amenity that belongs as much to Londoners and the whole nation as to the people who live in it. Once gone it is gone forever. It is not the Council’s to give away.

Policy P2 completely fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it has been around for a long time and it needs to be permanently protected. It was actually established in a local act of parliament in Guildford under the London Home Counties (Green Belt) Act 1938 and subsequently in the 1944 Greater London Plan to contain the outward sprawl of London. The boundaries of the Green Belt through Guildford Borough were later defined in the 1987 Local Plan, forming part of a 19-24km concentric belt around London. The Green Belt is intended to check the unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and other urban land. The principles of the Green Belt designation were outlined within Planning Policy Guidance 2: Green Belts (PPG2) and are found within the National Planning Policy Framework (NPPF). The Metropolitan Green Belt is an exemplar of good planning and the envy of planners throughout the world.

Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. Building on it involves high opportunity costs, including an irreversible loss of:

1. Agricultural production
2. Rural leisure and tourism amenities
3. Water catchment
4. Flood control
5. Biodiversity
6. Natural heritage
7. A carbon sink for air pollution
8. Room for public facilities such as parks and burial grounds
9. Profitable film locations (e.g. Shere)
10. Future economic potential such as mineral extraction (even fracking)
11. Natural beauty, landmarks, open space, rural views and sight lines
12. Benefits to public health and wellbeing, physical and psychological (as well expressed in the NPPF)

As a matter of law and national and local policy, these assets should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultations.

It is quite incorrect to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold.

I object to the “insetting” of 14 villages from the Green Belt. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost hell bent on self-defeat.

I believe this policy is based on a flawed Green Belt and Countryside Study that, according to one Conservative Councillor, was irregularly commissioned by Council officers without the authority of Councillors.

To “inset” two thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, although they would quickly destroy them if the proposed “insetting” and boundary extensions go ahead.
I object to the removal of over 400 hectares of Green Belt land in and around Blackwell Farm to facilitate further development of Surrey Research Park and for 1800 homes. Over 60 hectares were removed from Green Belt 12 years ago for the same developer (Surrey University) who has yet to fulfill their planning obligations. This valuable land has been squandered with over 17 acres of surface car parking and as one of the key features of Green belt is its ‘permanence’ this second request for yet more Green Belt land to be released in such a short space of time, with all the outstanding issues that remain makes this all the more objectionable.

Furthermore I object on grounds of the impact this development will have in terms of congestion on our highways, these issues have been highlighted under ‘infrastructure’.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17628  Respondent: 15688481 / Sally Lescher  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to ALL Green Belt sites allocated for development in the local plan

I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development, however, it does identify the principle of development and uses.” This ignores the tens of thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. This amounts to a war of attrition by the Council in conjunction with developers, since many busy residents are tired of repeating the same comments as it appears to be a waste of time and effort. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014.13

All Green Belt sites should be removed from the plan until “exceptional circumstances” for development are proven, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17676  Respondent: 15693153 / Zurich Assurance Ltd  Agent: Barton Willmore LLP (Sinéad Morrissey)

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy P2 sets out GBC’s continued commitment to protecting the Metropolitan Green Belt against inappropriate development by using criteria set out within the NPPF. Zurich supports the objective that new development in the Green Belt will be considered inappropriate and will not be permitted unless very special circumstances can be demonstrated.

The policy confirms that proposals will be permitted where they are consistent with the exceptions listed in national planning policy and, where relevant, the specific criteria set out in the policy.

There are insufficient opportunities for growth within both Guildford’s urban area and settlement areas within the Borough. This results in the need for GBC to release appropriate Green Belt sites in sustainable locations. Broadford Business Park is PDL and therefore complies with the sixth exception criteria set out in paragraph 89 of the NPPF. The
redevelopment of the Site is not therefore inappropriate in the context of Green Belt policy but will remain ‘washed over’ by Green Belt throughout the plan period.

Paragraph 4.3.18 of the Proposed Submission GBLP notes that the redevelopment of previously developed land where it would not have a greater impact on the openness of the Green Belt is an exception to new buildings being deemed inappropriate in the Green Belt (emphasis added). In December 2015, the department for Communities and Local Government conducted a ‘Consultation on proposed changes to national planning policy’. In accordance with the Government’s desire to utilise brownfield sites, contribute towards the delivery of Starter Homes and to add flexibility to the existing policy situation, paragraph 53 of the consultation document outlined that the redevelopment of brownfield land in the Green Belt need not be inappropriate unless any harm to the openness of the Green Belt was ‘substantial’.

Whilst Zurich recognises that the position and relationship of the Site relative to the Shalford settlement boundary, combined with the non-strategic nature of the proposed allocation, is not sufficient to warrant the Site’s release from the Green Belt, Policy P2 should remain sufficiently flexible to account for future changes in national planning policy. The following wording is therefore suggested:

“Whilst most forms of development are considered inappropriate in the Green Belt, national planning policy lists certain exceptions which are not inappropriate. These are set out in paragraphs 89 and 90 of the National Planning Policy Framework. The exceptions listed include development such as new buildings for agriculture and forestry, and the redevelopment of previously developed land where it would not have a greater subject to the impact on the openness of the Green Belt, as set out by national planning policy”.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  BBP-1 Reg 19 Reps.pdf (1.6 MB)
The Green Belts are not ours or yours to give away, but a precious gift to be preserved for my children and their children.

**Housing**

I object to all policies based on your housing figures, which I believe are too high. I further object to a Plan which requires 70% of housing to be built on the Green Belt. Everything possible must be done to put as much of the housing as possible on urban brownfield land and I object to your policies which do not do this (Policies H1,H2). This will also help Guildford town centre which should be revitalised with more town centre housing than is proposed as shops shut with the move to internet shopping. (Objection to policy E7, E8).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Consequently I object to the in-setting of any villages from the Green Belt. I have seen no evidence of the ‘exceptional circumstances’ required by National Planning Policy for removing any of these villages from the Green Belt. Government policy is clear that housing needs is not sufficient to be presented as an exceptional circumstance.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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I object to all erosion of the green belt and any “in setting” (i.e. removal) of any villages from the green belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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I object to the Local Plan because we Locals have already made it clear through the ballot box that development on the green belt and over our villages is not wanted. I have not met anybody, other than above mentioned councillors, who supports the Local Plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
| Comment ID: PSLPP16/17766  Respondent: 15700353 / Edward Warren  Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |

I object to the building on any of the Borough’s greenbelt. It was put in place for good reason. There are no special reasons for destroying it. This in itself should be enough to reject substantial parts of the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

| Comment ID: PSLPP16/17845  Respondent: 15704737 / Sarah Smith  Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |

- Greenbelt land should not be built on as promised by the government. It should stay as the natural buffer between town and countryside, which is the reason it was created.

There are many other small issues in this plan but I felt I would voice my concerns and objections to the main points.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

| Comment ID: PSLPP16/17846  Respondent: 15704865 / Lauren Hunt  Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |

I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford’s urban brownfield areas much closer to existing transport hubs and population center.

I object to the large proposed development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

| Comment ID: PSLPP16/17857  Respondent: 15705281 / Anna-Maria Mitchell  Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 |
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the ‘in-setting’ of villages from the greenbelt, especially Clandon and Ripley. The greenbelt protection of these villages gives them a unique character that should be celebrated and conserved instead of destroyed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17863  Respondent: 15705473 / Shane Ince  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Whatever happened to the Green Belt - I fail to understand why the above referenced developments are being given serious consideration given the protection that I had understood to be provided by the "green belt" concept. Proceeding with the above developments on the scale currently envisaged can only lead to the increased "sub-urbanisation" of the area and the loss of the village character of the Horsleys and the surrounding area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17882  Respondent: 15705761 / David Jenner  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to removing Ripley, Send and Clandon from the Green Belt (Policy P2) together with the proposed development sites at Wisley Airfield and Garlick's Arch. I understand there have to be exceptional circumstances for these areas to be removed as required by National Planning Policy. We are providing large areas of countryside where people can walk and ride cycles and horses and generally enjoy the open air. Why cannot existing brownfield sites such as the one at Burnt Common which was removed from the original plan, be used instead of Green Belt?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2255  Respondent: 15705761 / David Jenner  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2017) and in particular to the changes affecting Ripley and Send, which make the Plan even worse than the 2016 proposals.

I object to the extended development in the Green Belt (Policy P2, Site A43)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to the change in policy on affordable homes (Policy 4.2.23) which we need in the countryside. No extra payments from developers will ensure the Council provides the necessary number.

I object to removing Send Business Park from the Green Belt (4.3.15), this is only a small collection of local businesses and there are no exceptional circumstances as required by the NPPF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I OBJECT to altering the green belt boundaries. Para 83 NPPF states green belt boundaries can only be altered in exceptional circumstances and where there is local support. Meeting the housing need is not exceptional circumstances. This has recently been reiterated by Central Government. No exceptional circumstances have been demonstrated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I am a Guildford Borough Council resident, living in the Normandy/Flexford area. I have some strong objections to the Guildford Borough Council (GBC) Proposed Submission Local Plan: Strategy and Sites (2017) (Reg 19) including changes made since the last draft.

I strongly object to the changes in policy P2. Green Belt is, amongst other things, vital to protecting our natural countryside from urban sprawl, and should not be removed from areas without proper evidence to support “exceptional circumstances” (as per National Planning Policy Framework (NPPF) para. 89). To suggest in the proposed changes that new areas - Normandy settlement, Flexford settlement and Walden Cottages - be inset from the Green Belt is in fact completely contradictory to the evidence that exists:-

- Past planning appeals APP/Y3615/W/15/3002308, APP/Y2615/A/10/2140630 and APP/Y3615/A/10/2131590 contained such evidence that these areas contribute to the openness of the Green Belt.
- The Sustainability Appraisal para. 10.4.7 contains evidence that the agricultural land affects the ‘openness’, is of Best and most Versatile (BMV) quality and contributes to the local rural economy.

The applicable land at Flexford and Normandy is also visible from the Surrey Hills Area of Outstanding Natural Beauty (AONB), so the loss of this area, and thus the countryside, by insetting it in the Green Belt would affect the views into...
and from the AONB.
I am concerned and object to the statement in the submission Local Plan under Green Belt Policy P2 (4.3.13) that Normandy, Flexford and 12 other villages are “now inset from the Green Belt”. This is extremely inaccurate, as the proposed changes are just that, proposals only, with no decision having been made to this end and therefore these areas still remain within the Green Belt.

There is no percentage of loss of land in the Green Belt which would be considered acceptable as stated in the NPPF or elsewhere. It is concerning that the plan claims to lose only 1.6% of the borough’s Green Belt, when in fact if measuring this accurately it would be closer to 7% when one considers all of the insetting, infilling and settlement boundary extensions.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: PSLPP16/17933  **Respondent:** 15710433 / Simon Hester  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

I overwhelmingly object to the removal of Guildfords greenbelt it makes the area special and desirable and helps to balance London's carbon emissions.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: pslp171/585  **Respondent:** 15711393 / Kirk Georgiou  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

The removal of green belt protection from the prison site meaning that it is likely to come forward for housing development. The nearest feasible access to the A3 is at the A247 junction.

The Plan states: “4.3.16 National planning policy requires that Green Belt boundaries are only amended in exceptional circumstances and that this must be undertaken as part of the Local Plan process. We consider that exceptional circumstances exist to justify the amendment of Green Belt boundaries in order to facilitate the development that is needed and promote sustainable patterns of development.”

The Plan fails to demonstrate that exceptional circumstances exist for each site that is to be taken from the green belt. The wording implies that it is legitimate to have a blanket change to green belt boundaries to facilitate development. That is not in accord with the NPPF.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: pslp171/1608  **Respondent:** 15717217 / Ian Ferguson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

If the Council fails to apply Green Belt protection or constrain expansion to reflect widespread, legitimate environmental and transport constraints, the 2017 Plan will cause harm to the qualities that underpin the economic success of Guildford and aggravate congestion.

Allocating too much land for development in the 2017 Plan will also result in Guildford being required to provide homes for Woking on our Green Belt which is folly given the constraints in Guildford, a gap town with constricted roads set in the Surrey Hills AONB.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18415  Respondent: 15724353 / Arvnid Parmar  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I
I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/18463  **Respondent:** 15724801 / Talei Fawcett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlick’s Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/18505  **Respondent:** 15725409 / Nicholas Ward  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** pslp171/1219  **Respondent:** 15728289 / Sir Rocco & Lady Alicia Forte  **Agent:** D2 Planning Limited (Des Dunlop)
We support the Council’s approach in principle to the most suitable strategy to accommodate future housing development. As part of that strategy land currently within the Green Belt has been assessed as to whether it represents the most suitable option for future development in accordance with national guidance.

The objectors own some 9.8 hectares of land at Ripley Lane, West Horsley (plan attached). This site lies within the Green Belt but has been previously assessed within the Council’s Green Belt Study as providing: - “opportunities to accommodate appropriate development without compromising the purposes of the Green Belt.”

The site was identified particularly as it was: - “generally contained by local undulations, hedgerows and railway infrastructure”

Accordingly, the site was allocated for residential development under Policy 73 of the draft Local Plan. However, the allocation was subsequently deleted in subsequent versions of the Local Plan. It is unclear why the draft allocation was deleted particularly when the site was assessed as being suitable for release and allocation.

**Sensitivity Analysis of Sites in the Green Belt**

The original Guildford Borough Green Belt and Countryside Study was produced in 2013 but during the subsequent period was amended several times. The resulting ‘suite’ of documents is therefore an amalgamation of different approaches to the topic.

The core of the methodology is the four states of analyses that result in a conclusion about specific sites within the Green Belt as to their appropriateness for development. Stage 1 identifies the land parcels that are the basis of the analyses, Stage 2 assesses the degree to which each parcel contributes to the mandatory purposes of the Green Belt, Stage 3 assesses the sustainability credentials of the land parcels and Stage 4 assesses their environmental capacity. Firstly, it is important to note that the ‘parcels’ are not necessarily ‘proposed sites for allocation’. So for example, four of the West Horsley proposed allocations falls within one parcel, whilst Ripley Lane alone falls within a difference parcel.

The Stage 1 analysis parcelled up the West Horsley area as shown in the following extract from the associated map.

The parcels are not arbitrarily drawn and use existing landscape features to define their boundaries. However, notwithstanding this, some ‘rules’ have been applied: -

- The criteria for establishing the land parcels included the following parameters:
  - Land parcels should follow identifiable landscape features
  - Land parcels should not cross motorways, A roads or railway infrastructure
  - Land parcels should only cross railway lines and rivers at bridges
  - Land parcels should not cross zone boundaries

These ‘rules’ are a subjective assessment of where a boundary should lie. The red lines shown on the plans define the parcel boundaries. The Ripley Lane site lies within the defined parcel D6 but having examined this against the ‘rules’ used the Ripley Lane site could just as easily have fallen within parcels D5 (using the edge of settlement hedgerow boundary rather than Ripley Lane tree/hedgerow feature) or C13 (using the ability of parcels to cross a railway line at a bridge).

The importance of defining a parcel boundary is revealed when one examines the Stage 2 analysis. This looks to each parcel to decide whether it fulfils one or more of the relevant purposes of the Green Belt. These purposes are defined in national guidance as: -

1. To check unrestricted sprawl of large built-up areas
2. To prevent neighbouring towns from merging into one another
3. To assist in safeguarding the countryside from encroachment
4. To preserve the setting and special character of historic towns
Each site is then scored 0 to 4 where 0 is where the parcel doesn’t fulfil that purpose and 1 is where it does. Therefore any one site could have a score of 0, 1, 2, 3, or 4. The stated methodology is that sites which score 3 or 4 means that the parcel should remain in the Green Belt. So, in the case of parcel C13 where the four other West Horsley sites are located, this is scored 2. To obtain this score the conclusion reached by the study is that it checks the northward sprawl of West Horsley (score 1), it assists in safeguarding the countryside from sprawl (score 1), it does not help to prevent neighbouring settlements from merging (score 0) and is not need to preserve the setting of a historic town (score 0). Hence why these four sites remain under consideration at this stage.

However, in the case of parcel D6, where the Ripley Lane site is located, all four of these purposes are scored 1, to a total of 4. Hence this is why the site is deemed to be in a sensitive Green Belt location and is so unsuitable for development. This is essentially different to the previous analysis that concluded that the site could be removed from the Green Belt.

In our opinion these analyses are flawed. In respect of the Ripley Lane site, it could only be considered a site that threatens unrestricted sprawl if there were no clear physical boundaries to such a spread. The site is bounded by the railway line on one side (already accepted in the methodology as a substantial boundary) and by residential development on two sides. The fourth side is bounded by a substantial semi woodland/hedgerow boundary and by Ripley Lane itself. At the very least the score of 1 is debatable.

The site clearly has no function in contributing to the merger of settlements. Parcel D6 was clearly intended to identify the open greenbelt space between the West and East Horsley, but the Ripley Lane site is on the western side of West Horsley. The conclusion about it causing a merger between settlements is clearly wrong and should not have been included as scoring 1 as happened to the rest of the parcel.

The assessment parcel D6 and thus Ripley Lane is correctly assessed as a site which assists insafeguarding the countryside from encroachment and so is properly scored as 1.

The assessment that parcel D6 assists in safeguarding the setting of the East and West Horsley Conservation Areas is a misinterpretation of the national guidance. The proper consideration is the ‘setting and special character of historic towns’, not individual Conservation Areas (the nearest) is severely restricted due to the vegetation around Pincott Farm. The conclusion that it preserves the setting of a historic town, even of a Conservation Area is totally unpersuasive and this assessment can be argued to score 0.

In addition, the scoring of parcel C13 looks odd in context. It scored an overall 2 but it is unclear why two of the sites (Site Ref A39 and A41) do not have a similar role to play in avoiding neighbouring sites from merging to that land which is within parcel D6 to the south beyond the railway line. Therefore why these two sites don’t score 3 instead of 2 and so taking them outside the area to be considered for development. It is another example of how the assessment parcels do not take account of the Green Belt sensitivity differences between parts of the parcel.

In conclusion, of the sites proposed for allocation at West Horsley in earlier drafts of the Plan, Ripley Lane had been excluded from the new draft Plan on the ground of a flawed Green Belt analysis.

Assessing the Settlement Boundary for ‘Inset Village’ Status

Volume IV of the Green Belt study deals with the methodology used in defining the ‘Inset village’ status for the purpose of excluding West Horsley from the Green Belt. It is essentially about defining an appropriate settlement boundary.

The assessment is a staged process; first identifying the type of development that exists and then the extent of the village as perceived to be apparent in the Green Belt. Given the topography and close proximity of the Ripley Lane site to the village, it is not surprising that the site lies within the village envelope identified on the assessment plan.

The assessment then identifies strong linear features such as roads and hedgerows and it is here that the subjective assessment notes the strength of the Ripley Lane feature and that of the fence line behind the properties along Silkworm lane. This formed the basis of the line drawn around West Horsley which excluded the Ripley Lane site. We are firmly of the view that this assessment is flawed for it failed to take account of the strong semi-woodland and hedgerow along the edge of the site at Ripley Lane which could be reasonably considered as a stronger feature than that chosen, lying behind the properties at Silkworm Lane. It is interesting to note that only a fence boundary defines the land owned by John Clark which is therefore contained within the village boundary for inset purposes thus releasing that land from the Green Belt designation.
The Sustainability ‘Credentials’ of Sites

It is unusual for a Green Belt Study to stray into the role of undertaking sustainability analyses of specific proposed sites, but this is contained within Volume III of the suite of documents and is part of the methodology used. The title of the document identifies the method used ‘Sustainability Walking distance Plans for Land Surrounding the Villages’. The study identifies the services available locally (rail stations, shops, schools, healthcare, SANGs, amenity spaces, community hall) and then works out how far it is to walk to them.

What this analysis concludes is that of the sites proposed within West Horsley, Ripley Lane does perform poorly in relation to others proposed for allocation. However, this is unsurprising given the criteria used and the obvious fact that it is East Horsley that contains the great majority of the services available in the area.

However, whilst the analysis is a complex methodology and comprehensively applied, the analysis is spread over several documents and it is not obvious what influence it had in the decision to remove Ripley Lane from consideration as an allocation. Neither is it clear from what has been published why ‘walking distances’ was the only sustainability criteria used. A Sustainability Analysis of Sites, as set out in the Council’s Sustainability Report of the Plan, is more comprehensive in its range of topics used and we would expect this document to form the basis of the criteria to be used on specific sites and that it would be more than one criterion.

The Ripley Lane site has been treated unfairly in the emerging Local Plan and that it should be reinstated as an allocation.

**Recommendation**

Delete the Ripley Lane site from the Green Belt and allocate for residential development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/17167  **Respondent:** 15733697 / Ripley Carriage Ltd (The Burr Family)  **Agent:** Shrimplin Brown (James Brown)

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

Our Client fully supports the proposal to expand village settlement boundaries and inset specific villages from the Green Belt, including Ripley. This is essential to ensure that the Council maximise the opportunities for housing delivery, particularly in the earlier years of the Local Plan.

**SUPPORT POLICY**

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp171/3234  **Respondent:** 15733697 / Ripley Carriage Ltd (The Burr Family)  **Agent:** Shrimplin Brown (James Brown)

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**
1.66 Our Client continues to fully support the proposal to expand village settlement boundaries and inset specific villages from the Green Belt, including Ripley. This is essential to ensure that the Council maximise the opportunities for housing delivery, particularly in the earlier years of the Local Plan.

1.67 However, the inclusion of Ripley as a settlement where only ‘Limited Infilling within the identified settlement boundaries’ is to be permitted is confusing and could conflict with the intention to inset the majority of the village from the Green Belt.

PARTIALLY SUPPORT POLICY - The policy needs to be clarified to confirm that limited infilling in Ripley will apply only to those areas NOT inset from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1244  Respondent: 15805601 / Guildford Greenbelt Group (Sir or madam)  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We object to the changes to Policy P2 because they have not addressed many of the 32,000 objections made to the 2016 plan.
We object to the new para (1) “The Metropolitan Green Belt will continue to be protected as shown designated on the Policies Map, against inappropriate development.

In accordance with national planning policy, the construction of new development will be considered inappropriate and will not be permitted unless very special circumstances can be demonstrated.” The words “as shown designated on the Policies Map” should be deleted. The Policies Map has effectively ignored huge areas of Green Belt protection and the new para (1) is therefore a sham.

We object to the proposed change that Send Business Park should be inset from the Green Belt due to the fact that: It is effectively a non-conforming user in an area of beautiful countryside adjacent to the beautiful Wey Navigation It has restricted access along Tannery Lane It should not be given the opportunity for further expansion or development Policy P2 still completely fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it has been around for a long time and it needs to be permanently protected. It was actually established in a local act of parliament in Guildford under the London Home Counties (Green Belt) Act 1938 and subsequently in the 1944 Greater London Plan to contain the outward sprawl of London. The boundaries of the Green Belt through Guildford Borough were later defined in the 1987 Local Plan, forming part of a 19-24km concentric belt around London. The Green Belt is intended to check the unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and other urban land. The principles of the Green Belt designation were outlined within Planning Policy Guidance 2: Green Belts (PPG2) and are found within the National Planning Policy Framework (NPPF). The Metropolitan Green Belt is an exemplar of good planning and the envy of planners throughout the world. Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. It is quite incorrect to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when inserting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold. No-one argues that we should sell 1.6% of the Crown jewels in order to build houses.

We object to the statement in the Draft Local Plan under Green Belt Policy P2 (4.3.13) which claims that 14 villages are “now inset from the Green Belt”. This statement is untrue as GBC is proposing to “inset” these village. No decision has been made by an Inspector, therefore the villages remain in the Green Belt. We object to the changed “insetting” of 15 villages (including Ripley) from the Green Belt, and at “infilling” 12 of the borough’s Green Belt villages. We are deeply disturbed that settlement boundaries are to be hugely extended in many villages (including Send) and that infilling is also...
proposed outside the settlement boundaries of 11 further villages. This is completely unplanned and unmeasured
development outside of the OAN. Many Guildford villages are “leggy” in outline, reflecting the effect of ribbon
development (often along just one side of existing roads) permitted between the Wars. It is all too easy to square off
boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes
nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4
tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages
within the Green Belt vulnerable to large blocks of new development and seems almost hell bent on self-defeat. Many of
the local village should not be removed from the Green Belt. Send, for example, provides an important Green Belt buffer
between Woking and Guildford. The village and the countryside behind the A247 should all be protected.

We object to three particularly vulnerable areas of high quality amenity land being taken out of the Green Belt at Send
which include:
- The land behind the schools including playing fields and woodland.
- The land to the right of Cartbridge by the River Wey Navigation up to the new boundary fence with Vision
  Engineering.
- Land to the left of Cartbridge going up to the old depot on the Wey Navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/17158</th>
<th>Respondent:</th>
<th>15806849 / Ptarmigan Land</th>
<th>Agent:</th>
<th>Iceni Projects Ltd (Stuart Mills)</th>
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<tr>
<td>Document:</td>
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<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( )</td>
<td>is Sound? ( )</td>
<td>is Legally Compliant? ( )</td>
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</table>

We support the Council’s Green Belt strategy as set out within Policy P2 and the text which supports the policy. In
particular, we support the intention to inset certain villages from the Green Belt, including Send Marsh/Burnt Common,
as set out at paragraph 4.3.13 and illustrated on the updated Proposals Map accompanying the Local Plan. This approach
is clearly justified by the Council’s evidence base, including Volume 4 of the Green Belt and Countryside Study, which
concluded that it would be appropriate to inset Send Marsh and Burntcommon within the Green Belt due to the high
density and distribution of existing development and the presence of recognisable and defensible boundaries. In this
regard, we consider the proposed removal of the village (including the proposed allocation at Garlick’s Arch – Sites A43
& 43a) to be entirely justified and compliant with national policy set out at paragraph 86 of the NPPF, and therefore
sound in accordance with the soundness tests at paragraph 182 of the NPPF.

We also strongly support the indication at paragraph 4.3.16 that the Council considers that exceptional circumstances
exist (as required by paragraph 83 of the NPPF) to justify the amendment of Green Belt boundaries in order to meet the
Borough’s development needs and promote sustainable patterns of development. We note that the 2015 West Surrey
SHMA identifies a very significant housing need for Guildford of 693 dwellings per annum, which compares to a
previous requirement under the revoked South East Plan of just 422 dwellings per annum. Meanwhile the 2016 Guildford
Borough Land Availability Assessment demonstrates that only a very limited number of the new dwellings required to
meet the Borough’s needs can be delivered in existing urban areas outside the Green Belt, as 79% of the Borough is
designated as Green Belt. The various volumes of the Council’s Green Belt and Countryside Study assess a number of
areas where the existing Green Belt boundaries can be satisfactorily adjusted to assist in meeting this significant need.

The NPPF places a much greater emphasis on seeking to meet objectively assessed needs than previous national policy,
and there are clearly a number of significant negative socio-economic consequences that result from a failure to meet
housing needs. These include reducing access to housing, increasing inequality and increasing house market volatility1.
One of the most significant impacts of a lack of housing supply is to reduce affordability, thereby increasing the numbers
of concealed households and increasing the proportion of income required to rent2. In this context, there is a clear
imperative to adjust Green Belt boundaries where the Council’s Green Belt assessment work indicates such an
amendment would be justifiable, and as such we consider that exceptional circumstances exist in the instance of
Guildford Borough to justify the alterations to the Green Belt boundaries currently proposed. We therefore consider that
the Council’s proposed Green Belt strategy is sound in this regard, as it is consistent with national policy, justified in relation to the evidence base, and positively prepared in terms of seeking to meet objectively assessed needs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9874  
Respondent: 15922337 / Andrew Malcher  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to all insetting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17104  
Respondent: 15922337 / Andrew Malcher  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Pyrford Green Belt Action Group objects to the Guildford Borough Council Local Plan. The massive development proposals in the Guildford Borough Council Plan do not just affect Guildford they affect the whole of Surrey, including Pyrford, and can not be viewed from Guildford Borough’s perspective alone.

Pyrford Green Belt Action Group objects to development on the Green Belt.

1.1 We object to the insetting of 14 villages from the Green Belt in Guildford, and the proposal that infilling is acceptable within a further 12 villages within the Green Belt. We are concerned that “infilling” is also proposed outside the settlement boundaries of 11 further villages.
1.2 We object to the proposals to inset Pyrford’s neighbouring Guildford villages of Ripley, Send and Clandon from the Green Belt. The Green Belt land surrounding these villages fulfils clear green belt purposes as laid down by the National Planning Policy Framework. Development in Send and Ripley would have a direct and detrimental effect on the open spaces and waterways of Pyrford, causing pollution and damage to natural habitats.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17695  
Respondent: 15922337 / Andrew Malcher  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to all development in the Green Belt.

The Green Belt has a vital role to play in providing clean air, fresh water and local food - and in the mitigation of climate...
change. The Green Belt is not just for humans, it is also home to wildlife. There is a responsibility to maintain and enhance ecosystem assets for future generations. Once the Green Belt is built over, it is gone for forever. Guildford does not “own” the Green Belt, it merely has responsibility for it’s care.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1509  Respondent: 15977889 / Charles Kimpton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Exceptional circumstances must be demonstrated in order to develop Greenbelt yet despite the weight of public opinion against weakening of this policy, 70% of new housing development will be in the countryside, of which, 58% will be in Greenbelt. By definition, this is not an exception and no attempt is made to demonstrate exceptional circumstances, in line with the requirements of the NPPF. Insetting villages is of concern since restrictions within the settlement boundary raises concerns over loss of character. The Rural Economic Strategy covered in 4.51a, promoting affordable homes everywhere in the countryside including the AONB as a main aim, is a mechanism for promoting overdevelopment in our countryside. It has not been subject to full public consultation and is based on data, which is not up-to-date.

Three major strategic sites – Blackwell Farm, Wisley Airfield and Gosden Hill Farm – are in the Green Belt. Previous consultations show that, in line with the NPPF, the public would prefer to use brownfield land in the urban area first.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/928  Respondent: 17164033 / David Roberts  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. Policy P2, P3, E5 and Sites: Green Belt

I OBJECT to those features of the latest draft Plan which, taken together, amount to a pre-determined attack on the Green Belt that conflicts with the Government’s policy commitment to sustainable development. These include:

- The proposal to locate 70% of new housing in the countryside and 58% in the Green Belt. This fails the test of common sense and proportionality, whereby any reasonable person might expect development to be concentrated in areas with existing infrastructure and facilities, and for each local community to bear a fair burden of disruptive development roughly according to its size.
- The location of three major strategic sites in the Green Belt: Blackwell Farm, Three Farms Meadow (so-called Wisley airfield) and Gosden Hill Farm. The failure to explain why this is necessary is unsound.
- The glaring absence of any “exceptional circumstance” justification, as required by the NPPF.
- The “insetting” of most of the borough’s rural villages from the Green Belt, threatening an irreversible loss of character amounting to a suburbanisation of much of the borough. Guildford would merge with Woking and an almost unbroken corridor of development would be created from Cobham to Guildford. Policy P2 misleadingly suggests that 14 villages “are now inset from the Green Belt”, creating an air of fait accompli. The draft Plan contains no reasoned arguments why this insetting has to be so extensive.
- Radical and arbitrary “infilling” and extensions of settlement boundaries (e.g. in rural West Horsley) prejudicing future planning decisions in favour of development.
• The absence of any systematic attempt in the draft Plan to mitigate damage to the Green Belt by auditing, cataloguing and prioritising the development of urban brownfield sites, many of which the Council already own. This is contrary to national policy and the Council’s own declared policy.
• The abuse of the “affordable” homes mechanism in the Rural Economic Strategy (para. 4.51a) to promote disproportionate development in the countryside, including the AONB. This has been sneaked in without proper public consultation and is based on out-of-date data.
• The failure to acknowledge the key part Metropolitan Green Belt development restrictions have historically played in incentivising urban regeneration (most spectacularly in central London) and its potential make-or-break role in the modernisation and revival of Guildford town centre.
• The lack of any concession to the sheer weight of tens of thousands of previous public objections to Green Belt over development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/50  Respondent: 17174017 / Joanne Moxon  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Green Belt, Policy 2 at paragraph 4.3.15 I object to the proposal to inset Send Business Park from the Green Belt because:

It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation There is highly restricted vehicular access along Tannery Lane in both directions Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/63  Respondent: 17184417 / Donald Pedonis  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the proposal to inset Send business park from the Green Belt ( Policy 2 at paragraph 4.B.15) because it would completely distort the openness of the Green Belt and is inappropriate. That area floods regularly and development would increase the problem of traffic and pollution.

Thank you for allowing my objections to the 2017 plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/64  Respondent: 17189057 / Kathryn Fox  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Green Belt, Policy 2 at paragraph 4.3.15
I object to the proposal to inset Send Business Park from the Green Belt because:
• It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation
• There is highly restricted vehicular access along Tannery Lane in both directions
• Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: pslp171/93  Respondent: 17205121 / Madeleine Davis  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Green Belt, Policy 2 at Paragraph 4.3.15
I strongly object to the proposal to inset Send Business Park from the Green Belt because:

• Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate.
• The vehicular access along Tannery Lane (in both directions) is extremely restricted
• It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation.

I sincerely hope that my objections will be sympathetically considered and that common sense prevails. Once the Green Belt has been lost and our beautiful villages spoilt there is no turning back.

The infrastructure of our villages is not able to support a substantial increase in population and traffic. The houses will not be affordable because in this area nothing is affordable. This can be seen by the 5 bedroom executive homes that are built on any bit of land that does become available. The only people who will benefit from these plans are those who will be involved in the building, thereby increasing their bank balances.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: pslp171/97  Respondent: 17207105 / Caroline Minter  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Green Belt, Policy 2 at paragraph 4.3.15 - I object to the proposal to inset Send Business Park from the Green Belt because further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate.

Finally, Sir Paul Beresford (our local MP), was re-elected following the election on 8th June. In his election leaflets, he distinctly said that he would protect our Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object removing Send Business Park from the Green Belt (4.3.15).

Send Business park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for its insetting (removal) from the Green Belt, and indeed GBC have not even attempted one. Therefore no "exceptional circumstances", as required by the NPPF can be claimed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: pslp171/322  Respondent: 17256577 / Tina Makin  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object removing Send Business Park from the Green Belt (4.3.15).

Send Business park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for it’s insetting (removal) from the Green Belt, and indeed GBC have not even attempted one. Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/326  Respondent: 17266785 / Ryan Brown  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

57% of new housing proposed is on land that is currently categorised as Greenbelt and this is, quite frankly, shameful as this land was supposed to be protected for future generations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/334  Respondent: 17267265 / Patricia & Normal Bloomfield  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Green Belt, Policy 2 at paragraph 4.3.15

I object to the proposal to inset Send Business Park from the Green Belt because:
• It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation
• There is highly restricted vehicular access along Tannery Lane in both directions
• Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/343  Respondent: 17267393 / Steve Knight  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Although GBC have added some additional verbiage aimed at protecting villages re infilling, I do not feel this goes far enough. Development in the villages should be appropriate in scale and have no unacceptable effect on the occupants of existing buildings. This has not always been the case with previous infilling developments which have been accepted in Jacobs Well. I also feel that the data source, with regards monitoring, should also be planning applications, not just planning appeals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/443  
Respondent: 17285249 / Stephen Green  
Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

I object to the proposal to inset Send Business park from the green belt because;  
- It will generate further traffic that will clog up the area to the detriment of all those currently living here  
- It is an areas of outstanding beauty and is quite rightly protected as green belt that would be completely destroyed by this change  
- there is no exceptional circumstance why the current green belt allocation should be changed for this purpose  

Please take every one of these objections into consideration for the local plan  

What changes (2016)/further amendments (2017) do you suggest should be made to the document?  

Attached documents:
I object to the proposal to inset Send Business Park from the Green Belt (Policy 2 at paragraph 4.3.15) because:

• It is effectively an old non-conforming user in an area of outstanding natural beauty which will be lost forever with consequent impacts on the quality of life of future generations
• There is highly restricted vehicular access along Tannery lane – in both directions
• Once again, it eliminates the openess of the Green Belt and is inappropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/480  Respondent: 17285569 / Angela Smith  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the proposal to inset Send Business Park from the Green Belt because:

It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation

There is highly restricted vehicular access along Tannery Lane in both directions - it is almost entirely single track

Further expansion or development at this location detracts from the openess of the Green Belt and is COMPLETELY inappropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/508  Respondent: 17286657 / Kristine Good  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Green Belt, Policy 2 at paragraph 4.3.15

Send Business Park now taken out of the Green Belt altogether

I object to the proposal to inset Send Business Park from the Green Belt because:

• It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation

• There is highly restricted vehicular access along Tannery Lane in both directions

• Further expansion or development at this location detracts from the openess of the Green Belt and is inappropriate
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<th>Comment ID: pslp171/529</th>
<th>Respondent: 17288289 / Ken Grainger</th>
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Green Belt, Policy 2 at paragraph 4.3.15

I object to the proposal to inset Send Business Park from the Green Belt because:

- It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation
- There is highly restricted vehicular access along Tannery Lane in both directions
- Further expansion or development at this location detracts from the openness of the Green Belt which both inappropriate and unacceptable

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Respondent: 17288513 / Andrew Bedworth</th>
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Green Belt, Policy 2 at paragraph 4.3.15

I object to the proposal to inset Send Business Park from the Green Belt because:

- It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation
- There is highly restricted vehicular access along Tannery Lane in both directions
- Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object to the proposal to inset Send Business Park from the Green Belt because:

- It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation
- There is highly restricted vehicular access along Tannery Lane in both directions - this road is already quite dangerous as it is single track in a number of places
- Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/567  Respondent: 17289377 / Kathleen & Christopher Vernum  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We object to Green Belt Policy 2 at paragraph 4.3.15, to inset Send Business Park as it is effectively an old non-conforming user in an area of outstanding countryside adjacent to the Way Navigation which is so popular with locals and tourists alike. There is highly restricted vehicular access along Tannery Lane in both directions and further expansion or development at this location is inappropriate.

We would like to keep Send as a village where people can thrive and live together without a large influx of further residents and businesses, which is the only reason we moved away from our previous home near Heathrow Airport. We are situated on Send Barns Lane and there is already a high volume of traffic passing our door which we had not anticipated, and we do not want further traffic re-directed along this route either as a short cut from the A3 or to be carrying more heavy lorries and trucks to access and serve businesses in this very small village.

Please do not allow these Local Plans to go through.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/568  Respondent: 17289473 / Mary Warren  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy 2, Paragraph 4.3.15 Removal of Send Business Park from the Green Belt. As already stated in the above objection, Tannery Lane is a narrow winding road completely unsuited to large HGVs. Already they cause considerable traffic problems and any increase in their number along this road will bring traffic to a standstill both in Tannery Lane and at its junction with the A247. The other exit from Tannery Lane is equally difficult and again unsuited to heavy traffic.

In conclusion, Send residents objected strongly to the previous version of the local plan. Despite this, the load on Send has increased. One has to wonder why Guildford Borough Council should single Send out for such over development when there are vacant brown field sites in Guildford and at Slyfield. No changes are proposed to the roads, schools, medical facilities or other essential infrastructure and the result will mean that Send becomes an overdeveloped suburb of Guildford with congested roads and traffic at a standstill pumping fumes into the air and damaging children's lungs. Is this really what they want?
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Respondent: 17291457 / Bridget Jobson</th>
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<tr>
<td>In view of new evidence which shows that Guildford’s projections for population growth is flawed and is predicting much higher growth than is likely, PLEASE can you reconsider your plan to build so many homes and especially on Green Belt land. There is evidence that Guildford's proposal for more than 12,426 homes (plus a buffer of 1,155 homes) is excessive and will result in needless loss of Green Belt and increased traffic congestion. It cannot be justified in what is already a highly congested borough.</td>
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<tr>
<td>There is evidence that Guildford’s population growth predictions are overestimated by about 40% because of under-recording of students leaving at the end of their studies.</td>
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<tr>
<td>Please LISTEN to the evidence and re-calculate your projections based on up-to-date evidence.</td>
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<tr>
<td>Once Green Belt land is gone - it is gone for ever. What will you say to your Grandchildren when they ask why Guildford is so busy and congested and horrid to live in?</td>
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<td>Send Business park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for it’s insetting (removal) from the Green Belt, and indeed GBC have not even attempted one. Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.</td>
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<th>Comment ID: pslp171/601</th>
<th>Respondent: 17293025 / Donna Deam</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>I object to the extended development in the Green Belt (Policy P2, Site A43)</td>
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I object to Garlick’s Arch (A43) being extended and the resulting urban sprawl. There are no exceptional circumstances for this site being removed from the Green Belt, as required by the National Planning Policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/602  Respondent: 17293121 / Glyn Nicholson-Ross  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

You have established a need over the entire Borough for eight plots or pitches for Travelling Showpeople to include storage facilities along with housing. Again, this not appropriate use of Green Belt land and furthermore why is 75% of this need included in your plans for Ripley? I object strongly to this unfair allocation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/624  Respondent: 17294049 / Genesis Town Planning (Paul White)  Agent: Genesis Town Planning (Paul White)

Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( No ), is Legally Compliant? ( Yes )

For a plan to be sound it has to be consistent with national planning policy. However we disagree that policy P2 and its lower case policy explanation at paragraph 4.3.18 fully reflects green belt policy guidance in paragraph 89 of the NPPF.

We act on behalf of Sandiacre Nurseries a local wholesale horticultural grower and have submitted a planning application for a glasshouse development in Guildford Borough in the green belt which is under consideration and pending a decision.

Adopted local plan policy RE2 on green belt does not properly reflect guidance in the NPPF. New wording has therefore been proposed in local plan policy P2 to reflect the NPPF but in our view this new wording still requires amendment.

Paragraph 89 of the NPPF lists 6 categories of development which are not inappropriate development in the green belt. We accept draft Policy P2 (2) states that proposals will be permitted where they are consistent with the exceptions listed in national planning policy but the policy and its reasoned justification at paragraph 4.3.18 does not recognise the NPPF guidance which has no requirement in the agriculture and forestry building exception to demonstrate that the building has to preserve the openness of the green belt and is not conflict with the purposes of including land within it.

In short, the category of exception in paragraph 89 of the NPPF for agricultural and forestry buildings is entirely unqualified regardless of size or location and is not subject to any proviso or limit as to the size of the building or its impact on openness as the other 5 categories are or the list of other forms of development in paragraph 90 are.

Under NPPF policy the physical presence of an agricultural building in the green belt should not therefore in itself be regarded as harmful to its openness or to the purposes of including land in the green belt. This has not however been clearly expressed in paragraph 4.3.18 which states that ‘…. The exceptions listed include development such as new buildings for agriculture and forestry, and the redevelopment of previously developed land subject to the impact on the openness of the green belt’.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

In our view, the reasoned justification to policy P2 in paragraph 4.3.18 should therefore be revised as follows:

‘Whilst most forms of development are considered inappropriate in the green belt, national planning policy lists certain exceptions which are not inappropriate. These are set out in paragraphs 89 and 90 of the national planning policy framework. The exceptions listed include development such as new buildings for agriculture and forestry which are entirely unqualified in terms of size of building, location or impact on openness and certain other forms of development including the redevelopment of previously developed land subject to their impact on the openness of the green belt’.

Attached documents:

Comment ID: pslp171/718  Respondent: 17302273 / R Singleton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Green Belt, Policy 2 at paragraph 4.3.15
Send business Park now to be taken out of the Green Belt altogether I object to, the proposal to inset Send Business Park from the Green Belt because:
1. As you will be aware this is effectively an old non-conforming user in an area of outstanding countryside which is adjacent to the beautiful Wey Navigation
2. The roads are narrow allowing restricted vehicle access along Tannery Lane in both directions
3. It is inappropriate for further expansion or development at this location and it will detract from the openness of Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/721  Respondent: 17302497 / F Bennett  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2017) and in particular to the changes affecting Ripley and Send, which make the Plan even worse than the 2016 proposals.

These are my main reasons/ I object on these grounds / …
The Government states that the green belt is safe from this kind of development, we expect them and you to live up to this commitment.
The channel4 dispatches programme on the 10th July gives us great concern about you living up to this commitment. In particular we are concerned about the Send site giving the arrangements with the Builder that Phillip Hammond was shown to have.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/723  Respondent: 17302497 / F Bennett  Agent:
I object removing Send Business Park from the Green Belt (4.3.15).

Send Business Park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for its insetting (removal) from the Green Belt, and indeed GBC have not even attempted one. Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the proposal to inset Send Business Park from the Green Belt because:
- The impact on small surrounding roads will create traffic gridlock
- It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation
- There is highly restricted vehicular access along Tannery Lane in both directions
- Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1008  Respondent: 17323713 / Obsidian Strategic (Philip Scott)  Agent: Obsidian Strategic (Philip Scott)

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( Yes )

Please refer to full Representations attached including an independent LVIA prepared by Enplan which demonstrates that Land at Pond Farm and Land South of New Pond Road (Site No. 80) does not contribute to the purposes of including land within the Green Belt due to the Promotion Site's defensible boundaries (including a busy road) and being more closely associated to the urban form of the settlement. The Pegasus Green Belt & Countryside Report also concluded that the site (area F6 B) 'provides opportunities to accommodate development without significantly compromising the purposes of the Green Belt'.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

The extent of the Green Belt should be further modified. Site No. 80 (SHLAA ref. 1140 and 2241) should be removed from the Green Belt in accordance with the draft housing allocation in the July 2014 (Regulation 18) version of the draft Local Plan.

Attached documents:

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Comment ID: pslp171/1030  Respondent: 17325665 / Claire Nix  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the extended development in the Green Belt (Policy P2, Site A43). The Green belt offers a number of benefits for both urban and rural population and was designed to protect that land for the foreseeable future. The policy of protecting green space near towns and cities has a big impact on the shape and nature of the places we live in and the protection should not be taken away. By preventing urban sprawl, we preserve the character of our rural communities and historic towns and villages and prevent towns from merging into one another. There is also an argument that removing land from the Green Belt and allowing developers to build on this land you do not achieve proper development of run down or derelict land. (consider the removal of A4 brownfield site from the Plan - see objection below Only 13% of England is currently green belt so to erode this small percentage is dangerous.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1032  Respondent: 17325665 / Claire Nix  Agent:
I object to removing Send Business Park from the Green Belt (4.3.15).

Send Business park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for it’s insitting (removal) from the Green Belt, and indeed GBC have not even attempted one. Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

After the previous draft of this plan the government issued a housing white paper (HWP) clarifying that green belt areas must be more strongly protected. This matter was alerted to the council by myself (and doubtless others). Unfortunately however the council decided to disregard this white paper (as it boasted to a public broadcast meeting) and has issued this revised draft. This amended draft indeed does ignore the HWP, which makes it inevitable that the plan will be declared unsound at review as GBC must be considered to have ignored this ‘material consideration’.

Furthermore as the government has said it will provide further guidance on the matter of setting ‘Objective Assessment’s of Need’ this Autumn and as such the timing of this exercise is completely dumbfounding.

In particular the HWP directed the council to plan for the maximum use of higher density urban development, brownfield regeneration and transport hub integration and to make all efforts to exhaust these options before considering others. The council has done none of these things – au contraire it seems to have done the opposite. As a starting point the council...
must finally make an up to date inventory of its housing stock and the likely availability of windfall, brownfield, transport and urban development sites, and apply maximised development density assumptions, before it can make a valid plan. The council in having done none of these things is failing in its duty.

Rather than properly examining the potential of town centres the council in this plan has decreed that the ‘tide cannot come in’. It has ignored the impact of the Internet and even allocated town centre space for additional retailing. Rather than face the prospect of boarded up shops this space would be much better used for residential development. The footfall this would generate may even ‘save’ these town centres. To confirm this ‘Canute’ fear the Carter Jonas study update 2017 from which the plan was developed even includes “demand” for retail space from companies already in administration!

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** pslp171/1063  **Respondent:** 17328609 / Mike Dean  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

Removal from the Green Belt of homes in Guildford Road, northern end of Glaziers Lane, Flexford, Walden Cottages & Palm House nurseries traveller site. I object to this proposal. Placing these homes outside of the Green Belt could enable development within these areas at much higher density and could lead to greater success for planning applications. This is a wrong decision as these areas contribute to the openness of the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** pslp171/1067  **Respondent:** 17328801 / Adriana Barnes  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

Policy 2 paragraph 4.3.15 green belt.

I object to the proposal to inset Send Business Park from the green belt. The business park fronts the River Wey navigation which is acknowledged as protected corridor. The business park is a historical accident arising from a former historic industrial use, Tannery Lane is too restricted for any increase in traffic and the business park should remain within the green belt to inhibit further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** pslp171/1069  **Respondent:** 17329025 / Andrew Hollis  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

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I object to the proposal to inset Send Business Park from the Green Belt because:

1. a) There is highly restricted vehicular access along Tannery Lane in both directions. The lane is very busy at peak times and will become worse.

1. b) Further expansion or development at this location detracts from the openness of the Green Belt and is totally inappropriate.

1. c) It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation canal and the Wey.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1074  Respondent: 17329217 / Karis Barnes  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy 2 paragraph 4.3.15 green belt.

I object to the proposal to inset Send Business Park from the green belt. The business park fronts the River Wey navigation which is acknowledged as protected corridor. The business park is a historical accident arising from a former historic industrial use. Tannery Lane is too restricted for any increase in traffic and the business park should remain within the green belt to inhibit further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1076  Respondent: 17329537 / D S White  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

GREEN BELT Policy 2 paragraph 4.3.15
I OBJECT to the proposal to inset Send Business Park from the Green Belt.
This non-conforming user occupies a site surrounded by countryside and the River Wey. Expansion of this industrial site will be detrimental to the open nature of the surrounding Green Belt. Finally, I repeat that I am at a loss to understand why Guildford Borough Council has totally ignored objections made by Send residents during the 2016 Plan Public Consultation and why Send, and its immediate area, has been targeted as an area "ripe for development".

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1149  Respondent: 17340193 / Surya Hotels (S Dulai)  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
In reference to the revised Policy P2 Green Belt

I make the following objections:

- I object to the changes to Policy P2 because they have not addressed many of the 32,000 comments made to the 2016 plan.
- I object to the new para (1) “The Metropolitan Green Belt will continue to be protected as shown designated on the Policies Map, against inappropriate development. In accordance with national planning policy, the construction of new development will be considered inappropriate and will not be permitted unless very special circumstances can be demonstrated.” The words “as shown designated on the Policies Map” should be deleted. The Policies Map has effectively ignored huge areas of Green Belt protection and the new para (1) is therefore a sham.
- I object to the proposed change that Normandy settlement, Flexford settlement and Walden Cottages should be inset from the Green Belt due to the fact that:
  - There is evidence in past planning appeals APP/Y3615/W/15/3002308, APP/Y3615/A/10/ 2140630 and APP/Y3615/A/10/ 2131590 that the land here contributes to the “openness” of the Green Belt
  - There is evidence in the Sustainability Appraisal para 10.4.7 that the agricultural land between the settlements is of BMV quality, exhibits ‘openness’ and contributes to the rural economy
  - The land in and around the settlements of Normandy and Flexford contributes to views into and from the Surrey Hills AONB (Hog’s Back)
- Policy P2 fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it needs to be permanently protected. The Green Belt is intended to check the unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and other urban land.
- Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital.
• It is incorrect to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of land that may be removed from the Green Belt.

• I object to the statement in the submission Local Plan under Green Belt Policy P2 (4.3.13) which claims that Normandy, Flexford and a further list of 12 villages are “now inset from the Green Belt”. This statement is untrue as GBC is proposing to “inset” these villages. No decision has been made by an Inspector, therefore the villages remain in the Green Belt.

• I object to the changed “insetting” of 15 villages from the Green Belt, and at “infilling” 12 of the borough’s Green Belt villages.

• I am concerned that settlement boundaries are to be hugely extended in many villages and that infilling is also proposed outside the settlement boundaries of 11 further villages. This is completely unplanned and unmeasured development outside the OAN.

• Many Guildford villages are elongated in outline, reflecting the effect of ribbon development (often along just one side of existing roads) permitted between the Wars. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1157  Respondent: 17341057 / Sustainable Land Products Limited (Owen Davies)  Agent: Roger Daniels

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? (No), is Sound? (No), is Legally Compliant? (No)

The Spatial Vision (following paragraph 3.1) and Local Plan Policies S2 and P2, as amended, are not sound.

The Spatial Vision, as amended, does not include a sufficient number and variety of housing allocations to meet the identified growth needs of the Borough. The reliance on a limited number of strategic greenfield sites with substantial infrastructure requirements results in shortages of housing land supply in the early years of the plan and uncertainties about housing delivery in the later years of the plan. In particular, the Council has not included sufficient land in sustainable locations on the edges of the urban areas, in locations that would entail modifications to the inner boundaries of the Green Belt, such as Tanglely Place Farm, Worplesdon.

The proposed phasing of housing supply in Policy S2 (spatial development strategy and annual housing targets), as amended, is not justified and does not meet the objectively-assessed need for housing consistently throughout the plan period. It is clear that there would not be a five-year supply of housing on adoption of the plan and there are also doubts about whether housing targets will be met later, because of restrictions on the release of housing land imposed by Green Belt Policy (P2) and the reliance of the spatial development strategy on specific infrastructure improvements.

Policy P2 and the related maps of Green Belt boundaries, as amended, are not sound as they are based on a review of Green Belt boundaries that does not comply with paragraphs 84 and 85 of the National Planning Policy Framework. In particular, insufficient weight has been given to the need to promote sustainable patterns of development and to the consistency of the policy with meeting identified requirements for sustainable development.

Opportunities for sustainable development for housing and other uses associated within the edges of the main urban areas and other settlements have been overlooked because of an inappropriate approach to review of the Green Belt, based on the boundaries of arbitrary land parcels.
The review of Green Belt in the area of Tangley Place Farm, Worplesdon, exemplifies these shortcomings which are explained in detail in the Tangley Place Concept Statement that forms part of this submission. In this area, Green Belt boundaries should be reviewed, as described in the report, to accommodate a mix of housing and open space uses (including SANG and other open space uses) within revised Green Belt boundaries that reflect physical features that are readily recognisable and likely to be permanent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

See above and the accompanying report from Sustainable Land Products (Tangley Place Concept Statement) for further details.

Attached documents:  BRS.5853_12 C Design Vision 230617.compressed (1).pdf (15.3 MB)

Comment ID: pslp171/1203  Respondent:  17346369 / The London Green Belt Council (Richard Knox-Johnston)

Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

We consider Guildford Borough Council’s revised Proposed Submission Local Plan to be unsound because it is not consistent with National Policy, sustainable or justified.

We strongly object to proposals to release Green Belt land on the following grounds:

- The Green Belt sites proposed for development still meet the requirements as set out in the paragraphs on Green Belt purposes in the National Planning Policy Framework (NPPF) and their removal would compromise the integrity of the London Metropolitan Green Belt.
- Notwithstanding the changes made to the Local Plan since the 2016 consultation, proposals to release large areas of Green Belt for development are inconsistent with the NPPF and with stated Government policy, as stated by the Secretary of State for Communities and Local Government.

The following points outline the reasons why we consider the Proposed Submission Local plan to be unsound and relate to the following policies:

- A25: Gosden Hill Farm
- A26: Blackwell Farm
- A35: Former Wisley Airfield
- A43: Garlick Arch
- A43a: Land for new north facing slip roads to/from A3 at Send Marsh/ Burnt Common
- E4: Surrey Research Park
- H2: Affordable Homes
- P2: Green Belt

1. The plan is inconsistent with the NPPF.

1.1 Guildford Borough Council has still failed to prove that the benefit of releasing land within the Metropolitan Green Belt area outweighs the harm. Notwithstanding the changes made to the revised plan, it is quite clear that the harm of removing Green Belt land which strongly meets Green Belt criteria in paragraph 80 of the NPPF considerably outweighs any benefits. Guildford Borough Council has failed to take account of the significant harm of releasing Green Belt for development, despite there being a clear environmental and social impact for both the residents of Guildford Borough Council and neighbouring authorities.
Paragraph 44 of The Planning Practice Guidance states that:

‘The Framework is clear that local planning authorities should, through their Local Plans, meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole, or specific policies ... Such policies include ... land designated as Green Belt’.

- 1.2 Proposed Green Belt development undermines the Green Belt’s purposes, in particular, checking unrestricted urban sprawl, preventing the merger of neighbouring towns and assisting urban regeneration.

Guildford Borough Council’s revised Proposed Submission Local Plan proposes to build in excess of 7000 homes on Green Belt land, approximately 58% of its total housing target. The proposed urban extensions at Blackwell Farm (Policy A26) and Gosden Hill Farm (Policy A25) are on sites particularly vital to prevent urban sprawl and are of strategic importance to the Metropolitan Green Belt in its entirety. These sites also include high grade agricultural land as well as land significant for recreation which contributes to Surrey’s iconic landscape including Hogs Back.

- Gosden Hill Farm (Policy A25)
  This site performs all the functions of the Green Belt but particularly prevents the merger of neighbouring towns by separating West Clandon from the edge of urban Guildford. Notwithstanding the changes in the revised plan, the proposals would cause the coalescence of the two towns. Along with the proposal for on-slip and offslips roads at Garlick’s Arch (policy A43a ), this would lead to continuous development from Send to Guildford.
- Blackwell Farm (Policy A26)
  Blackwell Farm is of strategic importance for the whole of the Metropolitan Green Belt. It performs all five functions of Green Belt, and fulfils purposes 1, 3 and 5 very strongly. It clearly prevents urban sprawl to the West of Guildford and protects the countryside (including AONB) from incursion. Furthermore, the revised plan disregards an independent expert landscape study, which demonstrates that part of The site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review.
- Land at former Wisley Airfield (Policy A35)
  This land plays a significant role in curtailing urban sprawl. In rejecting previous planning applications on this site, Guildford Borough Council Planning Officers themselves stated that development would be inappropriate due to the impact on the openness of the land.

The Proposed Submission Local Plan is unsustainable

2.1. Focusing housing development on Green Belt land makes the Local Plan’s affordable Housing Policy unachievable.

The changes in policy H2 Affordable Homes do not go far enough to address affordable or social housing need. By continuing to concentrate housing development on Green Belt rather than urban sites, the revised Proposed Submission Local Plan renders the 40% affordable target stated in the Local Plan’s Affordable Homes Policy unachievable.

As mentioned in 3.2 below, the fact that Guildford Borough Council has failed to set higher densities for the urban area and has deleted all reference to “density for development” in its revised Local Plan means that the plan is out of step with current policy direction and is therefore unsustainable.

2.2 Development at Garlick Arch (Policy A43) would lead to the loss of rural employment

Notwithstanding the changes made in the revised plan, Policy A43 does not mitigate the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over nine years.
2.3. Development on Green Belt sites will increase traffic congestion, significantly impact on air quality and lead to flooding.

The development proposed on Green Belt sites is dependent on large, uncommitted road building schemes; will have a detrimental impact on traffic volume and associated air quality as well as increasing flood risk.

- **Gosden Hill Farm (Policy A25)**
  The volume of traffic will greatly increase air pollution by:
  - Generating approximately 6,000 vehicles which will exit straight on to the already heavily congested road network;
  - The linking of the A3100, B2215 and A247, channelling thousands of cars through the narrow, winding road through West Clandon;
  - The proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common which would generate even larger volumes of on the A247 through Send and West Clandon.

- **Blackwell Farm (Policy A26) and Surrey Research Park (Policy E4)**
  The development will heighten the risk of flooding and the volume of traffic will add to air pollution in neighbouring areas, which already exceeds safe EU limits for Nitrogen Dioxide as a result of:
  - Damaging Hogs Back’s function as a soak away for surface rainwater - development on Blackwell Farms slopes will cause water to travel north, adding to existing flooding in Wood Street Village, Fairlands and Whitmore Common;
  - Directing more office space to an extended business park [Policy E4] which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas;
  - ignoring independent expert traffic studies which show the impact of development at Blackwell Farm on the local network, questioning the viability of the development;
  - removing Guildford’s “green lung” on the slopes of the Hogs Back. In the UK, the prevailing winds are from the West. The open farmland to the west of Guildford allows clean air to be blown into the town. If this area is urbanised, CO2 emissions and other pollutants will replace this clean air.

- **Land at former Wisley Airfield (Policy A35)**
  This development would cause further harm to air quality both onsite and in the Cobham Air Quality Management Area due to the proximity to the severely congested A3/ M25 junction and Ripley village and roundabouts.

3. The Proposed Submission Local Plan is unjustified.

3.1. Green Belt should have been considered as a constraint when setting housing targets but, notwithstanding the changes made since the 2016 consultation, this has not happened.

The revised Proposed Submission Local Plan is not compliant with national policy as, notwithstanding the changes made since the 2016 consultation, it still does not take sufficient account of Green Belt constraints on development. The reduction in the housing target by just 1,434 from 13,860 to 12,426 means that the changes do not sufficiently take account of constraint. This is in direct contrast to the Secretary of State’s 2016 statement that Green Belt should be ‘absolutely sacrosanct’.

Paragraph 45 of the Planning Practice Guidance clearly states that councils should take account of policies such as the Green Belt which indicate development should be restricted.

"Once need has been assessed, the local planning authority should prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period, and in so doing take account of any constraints such as Green..."
Belt, which indicate that development should be restricted and which may restrain the ability of an authority to meet its need."

The government has also repeatedly made it clear that demand for housing is unlikely to be accepted as the exceptional circumstances needed to justify changing Green Belt boundaries for example in ministers’ clarifications in letters to MPs, referring directly to the Local Plan preparation process: “we have been repeatedly clear that demand for housing alone will not change green belt boundaries” [Letter from Brandon Lewis to MPs 7 June 2016]. Guildford Borough Council is clearly justifying the release of Green Belt by arguing it is needed for housing, however as mentioned in 2.1, this is unsustainable in providing the housing needed and thus cannot warrant exceptional circumstances.

3.2 Local Plan revisions do not taken account of the policy intentions set out in the Housing White Paper, published following the original Regulation 19 consultation.

The Housing White Paper, published after the previous Regulation 19 consultation, made it explicit that Local Authorities must look at ALL alternatives before releasing Green Belt land including increasing density and making the most of available brownfield sites. Previous consultations show that Guildford residents would prefer to use brownfield land in the urban area first.

The revised Local Plan is thus unjustified because it fails to fully explore the many opportunities within the borough where there is no presumption against development which would mitigate the release of Green Belt land AND assist in urban regeneration.

- **Densification**
  - More effective use of current space would remove the need for new land.
  - Urban densities in Guildford town are no higher than the villages that surround it despite the majority of villages being in the Green Belt and protected from development.
  - Only 10% of the total housing proposed in the revised Local Plan is proposed in Guildford Town Centre. The fact that Guildford Borough Council has failed to set higher densities for the urban area and has deleted all reference to “density for development” in the revised Local Plan means that the plan is out of step with current policy direction and unsustainable.
  - The existing Surrey Research Park is low density with just 65,000m2 of office space over 27 ha. This land could be used far more effectively by providing office space on car parks and other mixed use development.
  - If the plot-ratio in the approved Manor Park master plan was applied to the existing Research Park, six times as much office accommodation could be provided therein.

- **Brownfield**
  - Guildford town has developed very little over the last 20 years and has not undergone the type of normal urban expansion, redevelopment of previously developed sites and increase in residential densities as nearby towns such as Woking.
  - Sites by River Wey could be used to provide affordable accommodation where it is needed rather than unnecessary retail development. The Carter Jonas Guildford Retail Study Update 2017 lacks credibility and there is no proven case for expanding comparison retail space which is undermined by failure to implement existing retail consents at the North Street development over the last 10 years. The Guildford Retail Study does not take account of changing retail patterns in relation to the decline in high street retail due to the rise of internet shopping. The study also assumes a number of logged retail requirements from companies already in liquidation or with national requirements that exclude Guildford.
  - The plan overlooks Bordon and Whitehill eco-town which is seeking high quality businesses to re-locate.

Moreover, the Housing White Paper also sends a clear signal to developers that they must build out permissions. The University of Surrey was permitted to remove 64 ha of land from The Green Belt at Manor Park in 2003 citing the need to build 5090 student and staff residences as exceptional circumstances. 14 years on, only one third of these have been
built yet the university has claimed that students want to live off-campus, now referring to Guildford’s acute housing need as an exceptional circumstance to build on Blackwell Farm (Policy A26).

3.2 The proposal to extend Surrey Research Park onto Green Belt land at Blackwell Farm does not constitute exceptional circumstances. The excessive expansion of Surrey Research Park (Policy E4) onto Green Belt land at Blackwell Farm is not supported by the findings of the Employment Land Needs Assessment 2017. The current site is very low density and could easily be increased within its existing curtilage.

4. Proposed modifications.
   a. Revise housing targets to a more credible level, taking into account the Green Belt as a constraint to development. The London Green Belt council concurs with the Guildford Green Belt Group that a target of 4,000 homes would remove the need to build on Green Belt or open countryside, meeting the largest public objection to the plan as a whole.
   b. Instigate a more sustainable alternative to meeting housing need by following government policy to develop on previously developed sites in the urban area, many of which are owned by the Council.
   c. Include far more affordable housing to meet the need for young families and young people in the Guildford area.
   d. Impose a moratorium on any development proposed on University of Surrey Green Belt land until it has completed all the developments proposed in its 2003 Manor Farm proposal.
   e. Increase the Surrey Research Park plot ratio from 25% to 50% to keep development within the same footprint of the existing park without damaging its amenity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1259  Respondent: 17355265 / James and Sarah Gooden  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( No )

We are writing to object to Guildford Borough Council's proposed changes in Policy P2 Green Belt because they have not addressed many of the 32,000 comments made to the 2016 plan. We are extremely disappointed that the Council has failed to recognise Normandy's and Flexford's contribution to the "Openness" of the Green Belt and are proposing "Insetting" the two Settlements rather than leaving them "washed over" by Green Belt. "Insetting" will create small islands of "Urban" land in the Green Belt, which is irrational.

Therefore we object to the proposed change that Normandy Settlement, Flexford Settlement and Walden Cottages should be Inset from the Green Belt due to the fact that:
• There is evidence in past planning appeals APP/Y36 151W/I 5/3002308, APPfY36I5/A110/2140630 and APPfY3615IAJI0/2131590 that the land here contributes to the "Openness" of the Green Belt.
• There is evidence in the Sustainabilirv Appraisal Para 10.4.7 that the Agricultural Land between the settlements is of BMV quality, exhibits "Openness" and contributes to the rural economy.
• The land in and around the Settlements of Normandy and Flexford contributes to views into and from the Surrey Hills AONB (Hog's Back).

Furthermore, Policy P2 fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it needs to be permanently protected. The Green Belt is intended to:
• Check the unrestricted sprawl of built-up areas.
• Prevent neighbouring towns from merging into one another.
• Safeguard the Countryside from encroachment.
• Preserve the setting and special character of historic towns.
• Assist with urban regeneration by encouraging the recycling of derelict and other urban land.

We additionally observe that Policy P2 unacceptably omits any assessment of the Green Belt's value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. We object to the statement in the Local Plan under Green Belt Policy P2 (4.3.13) which claims that Normandy, Flexford and a further list of 12 villages are "now Inset from
the Green Belt”. This statement is untrue as GBC is proposing to "Inset" these villages. No decision has been made by an Inspector, therefore the villages remain in the Green Belt.

In conclusion, the Council has provided no evidence of "Exceptional Circumstances” in the proposed submission documents, (as required by NPPF Para 89). This would be necessary if the Council were to remove any land from the Green Belt and to effectively redraw the Green Belt boundary. They cannot therefore legally proceed with Policy P2 as currently drafted. We trust that our comments will be considered carefully by GBC before the Local Plan is finalised.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

| Comment ID: pslp171/1288 | Respondent: 17365185 / Leslie Swark | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |

I would like to file my utter objection to the proposed possibility of the erection of homes in the Paddocks area. This is green belt land and therefore should be sacrasanct to any building thereon.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

| Comment ID: pslp171/1308 | Respondent: 17368705 / Reginald and Mavis Perryman | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |

We therefore object to the local plan as it stands, on grounds that development encroaches into the Green-belt: that the Borough has failed to provide satisfactory evidence of need or exceptional circumstances for most of the development, and that the Plan fails to provide infrastructure improvement already needed without additional local development. We forcefully object to removal or 'inset' from the Green-belt of Send and other villages in the Borough, or any sections of land such as Send Business Park (Policy 2 at paragraph 4.3.15). This can only be done in exceptional circumstances, for which none exist. This practice is a deliberate act to erode the Green-belt by stealth and must not be allowed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

| Comment ID: pslp171/1320 | Respondent: 17372769 / P Robertson | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |

Policy P2 Green Belt:
Removal from the Green Belt of homes in Guildford Road, northern end of Glaziers Lane, Flexford, Walden Cottages and Palm House Nurseries traveller site. I strongly disagree for these areas to be inset and lose the protection of the Green
Policy P2: Green Belt

Policy P2, along with the policy map and site allocations, establishes the principle of the need to remove land from the Green Belt and identifies appropriate locations to do so. The NPPF states that:

"When drawing up or reviewing Green Belt boundaries LPAs should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary" (para. 84). The NPPF goes on to say that LPAs should:

"satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period" and "define boundaries clearly, using physical features that are readily recognisable and likely to be permanent" (para. 85).

The Council has acknowledged that development in and around Guildford's largest towns will not provide the land needed to meet its OAN. It has been demonstrated through the recent Inquiry on Howard of Effingham and Lodge Farm that the Green Belt in Effingham is out of date. The Green Belt has not been reviewed since 1987. The Green Belt Study commissioned from expert consultants for the purpose of informing the Local Plan identifies that Lodge Farm could be developed without significantly compromising the purposes of the Green Belt. We maintain our view that the Effingham Sites (Site Allocation 69) was an appropriate Green Belt release and continues to be supported by the Council's evidence base. We do not believe that the additional information produced by the Council since the Draft Local Plan (2014) justifies the removal of the Effingham Sites (Site Allocation 69). We regard the revised approach to allocations as inconsistent and not justified against reasonable alternatives.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1333  Respondent: 17373025 / Stephen Marshall  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- I object to the changes to policy P2. They do not appear to have taken into account thousands of comments made during the 2016 consultation and are at odds with national and local policies and the evidence base for this plan process.
- I object to the changes made to the settlement boundaries in Normandy and Flexford, insetting these areas from the Green Belt. No argument of very special circumstances has been advanced for consideration – those mentioned in 4.3.18 would not justify any change in Normandy and Flexford. The impression given in paragraph 4.3.13 is that this has already happened rather than being a proposal; this is misleading and may cause people not to realise the proposed change.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1337  Respondent: 17373505 / Paul Beach  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object removing Send Business Park from the Green Belt (4.3.15)

Send Business Park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for it’s removal from the Green Belt, and indeed GBC have not even attempted one. Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1373  Respondent: 17380161 / Nicola Banham  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the proposal to inset Send Business Park from the Green Belt because:

• The impact on small surrounding roads will create traffic gridlock
• It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation
• There is highly restricted vehicular access along Tannery Lane in both directions
• Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1216  Respondent: 17380865 / Crownhall Estates (Sir or madam)  Agent: Turley (David Murray Cox)

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY P2: GREEN BELT

Crownhall Estates note that housing delivery within Guildford Borough is already highly restrained by the fact that a large part of the Borough is designated as being within the Green Belt. However it is noted (as demonstrated by paragraph 4.3.17 of the Proposed Submission Local Plan and the associated maps) that a large part of the Borough (currently designated as Countryside Beyond the Green Belt) is proposed to be designated as Green Belt.

These representations raise the following concerns regarding the Council’s intention to designate large parts of the Borough
(currently designated as Countryside Beyond the Green Belt) as Green Belt:
• The process of assessing sites and the availability of land on the basis of the intention that it be designated as Green Belt;
• The implications of designating the additional land as being within the Green Belt on housing delivery during and beyond the Plan period;
• The implications of designating the additional land as Green to the delivery of sustainable development;
• Whether these areas (in particular the Land north of Poyle Road, Tongham) should be designated as Green Belt;

The Council propose to amend Green Belt boundaries within the Borough through the emerging Local Plan. Within their proposals, the Council plans to designate the Land north of Poyle Road, Tongham (currently Countryside Beyond the Green Belt) as part of the Green Belt. In line with the NPPF, paragraph 83, the Council are required to demonstrate that exceptional circumstances exist in order to make said amendments to the Green Belt. These circumstances are given as a high level of need for housing and “the lack of sufficient suitable and deliverable sites located outside the Green Belt”. We find it incomprehensible that the Council considers the high level of housing need to represent an exceptional circumstance which justifies designating large parts of the Borough (currently designated as Countryside Beyond the Green Belt) as Green Belt. As these representations explain, the conclusion that there is a ‘lack of sufficient suitable and deliverable sites located outside the Green Belt’ is a self-fulfilling prophecy arising from the decision not to assess sites further due to the intention that they be designated as Green Belt.

The Council’s approach is further undermined on the basis that sites within the Green Belt are proposed to be released, yet sites outside of the Green Belt were discounted from further assessment on the basis of the Council’s intention to designate them as Green Belt.

The implications of designating the additional land as being within the Green Belt on housing delivery during and beyond the Plan period

The Council’s proposal to designate large parts of the Borough (currently designated as Countryside Beyond the Green Belt) as Green Belt raises three particular concerns regarding housing delivery (notwithstanding the issue of whether or not they should be designated as such for Green Belt purposes):

• As it explains above the Council’s approach represents an artificially constrained view of land availability within Guildford Borough and if the Council had not followed such an approach we consider that it would be reasonable to conclude that additional sites could be identified, therefore helping to meet the objectively assessed need for housing, particularly in the early part of the Plan period;
• Paragraph 83 of the NPPF states that once established, Green Belt boundaries should only be altered in exceptional circumstances through the preparation or review of the Local Plan. Paragraph 83 of the NPPF continues by stating that “At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.” On the basis that the Council has not been able to identify sufficient sites within existing urban areas or outside of the Green Belt to achieve the housing required to 2034, it is highly unlikely that a forthcoming review of the Local Plan will be able to. In that circumstance, it is highly likely (given the even greater proportion of the Borough which is proposed to be designated as Green Belt) that a further review of the Green Belt boundaries will be required. On that basis, the proposed alterations to the Green Belt are highly unlikely to endure beyond the Plan period.
• There has been a track record of housing shortfall in the Borough, with the Council’s evidence showing 2.36 years supply of deliverable housing sites. As the NPPF sets out, very special circumstances must be demonstrated as part of a planning application if “inappropriate” development (as defined in the NPPF) in the Green Belt is to be allowed. The Secretary of State’s decision of 21 April 2017 in an appeal (PINS ref: APP/M1520/A/14/2216062) concerning land in Castle Point Borough highlights the issues of housing development proposed in the Green Belt. In that case, the Secretary of State concluded that the housing supply position was closer to the appellant’s proposition of 0.4 years. Designating large parts of the Borough (currently designated as Countryside Beyond the Green Belt) Green Belt would therefore provide no flexibility and very limited opportunities to help resolve a housing land supply shortfall at some point in the future. The implications of this are reinforced by paragraph 4.1.4 of the Proposed Submission Local Plan.

Within the Housing Topic Paper (June 2017), the Council states that:

• “To not amend boundaries (Green Belt), would lead to a significant undersupply of homes compared to the identified needs – approximately half”
Crownhall Estates consider that the proposal to designate additional land, namely that north of Poyle Road, Tongham as Green Belt, will lead and compound the issue of land supply throughout and beyond the plan period.

Despite the Council’s claim that every effort has been made to investigate sustainable sites for housing delivery, they have clearly overlooked sites where development could be achieved, such as our Client’s site. This is clearly demonstrated by the decision not to assess the site further given the proposal to designate the site as Green Belt which we consider to be fundamentally flawed. Within the LAA (2016), the Land north of Poyle Road, Tongham was not assessed as a possible allocation due to suitability issues related to the proposed Green Belt designation of this land and for no other reason. However, under the adopted Guildford Borough Local Plan (2003), the Land north of Poyle Road, Tongham is designated as Countryside Beyond the Green Belt (CBGB).

There is now clearly an identified need to bring such land forward for development to meet the housing needs of the Borough and provide an opportunity to meet unmet needs arising from within the wider Housing Market Area.

Whether these areas (in particular the land north of Poyle Road, Tongham) should be designated as Green Belt

Paragraphs 79 and 80 of the NPPF set out the five purposes of the Green Belt as well as the fundamental aim of ensuring their openness and permanence.

Paragraph 80 of the NPPF states that the Green Belt serves five purposes as shown below:

- To check the unrestricted sprawl of large built-up areas;
- To prevent neighbouring towns merging into one another;
- To assist in safeguarding the countryside from encroachment;
- To preserve the setting and special character of historic towns; and
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban areas.

The Proposed Submission Local Plan, and the proposed strategy for amending Green Belt boundaries, has been informed by various volumes of the Green Belt and Countryside Study conducted by Pegasus on behalf of the Council between 2013 and 2014.

A sensitivity map (dated March 2014, see below) produced as part of the Green Belt and Countryside Study was used as a starting point to help inform proposed site allocations within the Proposed Submission Local Plan. The Land north of Poyle Road, Tongham falls within the area ‘K5’ (circled in blue in Figure 1 below). This sensitivity assessment map shows that the K5 site is considered to be of ‘high sensitivity’ to Green Belt.

Figure 1: Sensitivity Assessment Map – Green Belt and Countryside Study

There appear to be inconsistencies within the methodology of the Green Belt and Countryside Study. In Volume II of the Green Belt and Countryside Study (2013) the K5 site (that covers the Land north of Poyle Road, Tongham) is assessed against four Green Belt purposes, as guided by the NPPF and receives an overall score of 2 out 4. This overall score deems that K5 contributes less significantly to the purposes of the Green Belt than many of the other parcels assessed. Yet on the sensitivity map above (Figure 1 of these representations), the K5 parcel that covers our client’s site is deemed to be of ‘high sensitivity’ to the Green Belt. The Housing Topic paper (2017) directly refers to this sensitivity map stating that land parcels marked as high sensitivity to the Green Belt scored either 3/4 or 4/4 within the Green Belt Study detailed above. This inconsistency within the methodology is particularly concerning as this study has formed part of the evidence base used within the updated Regulation 19 Local Plan (2017) and therefore the proposal to designate the area within the Green Belt.

Although the study finds the K5 parcel to have ‘less significance’ to the Green Belt, under the four stages of review the land is deemed to be suitable for Green Belt designation. However, the assessment also states that “the decision on whether to extend the Green Belt into land parcel K5 will also be informed by the likely levels of future development, and whether the land may be more appropriately designated as ‘safeguarded’, as defined within para 85 of NPPF”. If the Council is to designate land as Green Belt this must ensure the permanence of the boundaries in line with paragraph 85 of the NPPF. If the Council deems the K5 parcel (including Land north of Poyle Road, Tongham) to be suitable for development in the future then a Green Belt designation would, under this emerging Local Plan, require that exceptional circumstances are demonstrated. It is evident that the Council is unable to ‘satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period’, in line with paragraph 83 of the NPPF.
The land parcel K5 assessed within the study covers the entire distance of the gap between the Tongham settlement area and Ash Green. The K5 parcel was deemed to serve two of four Green Belt purposes. Our client’s site forms only part of the K5 area (highlighted in yellow, within the K5 parcel outlined in red in Figure 2).

Figure 2: Land Parcel K5, Green Belt and Countryside Study

The Land north of Poyle Road, Tongham should be reviewed, as a singular parcel of land, for its contribution to the two Green Belt purposes the council have identified K5 to serve. The following table sets out the assessment of the area as contained in the Green Belt and Countryside Study alongside our comments as to how the site functions in isolation.

In summary of the assessment above, when reviewed independently the Land north of Poyle Road, Tongham does not achieve any of the purposes of the Green Belt.

We also note that the area of Suitable Alternative Natural Greenspace (SANG) approved under application reference 12/P/01973 lies immediately to the land north of Poyle Road, Tongham. This SANG will ensure the maintenance of an area between Ash/Tongham and Ash Green which therefore checks the unrestricted sprawl of settlements.

Paragraph 85 of the NPPF requires that when defining Green Belt boundaries, local planning authorities should (inter alia):

• Ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;
• Not include land which it is unnecessary to keep permanently open; and
• Satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period;

As these representations establish, designating the land north of Poyle Road, Tongham would not fulfil the requirements in the three points above. Tongham occupies an elevated position in the settlement hierarchy and the designation of Green Belt as proposed would severely restrict the opportunities for sustainable patterns of development. It is unnecessary for the land north of Poyle Road, Tongam to be kept permanently open. Even if it were developed, there would remain an area of separation between Tongham and Ash Green (partly due to the SANG to the north and partly due to a remaining area of countryside). Furthermore, as these representations explain, if this area is to be defined as Green Belt, the Council cannot be satisfied that it will not need to alter the Green Belt boundaries at the end of the Plan period (or as part of a review of the Local Plan).

We note that in the Waverley Local Plan Part 1 Examination, the Inspector was asked to consider the identification of new areas of Green Belt at Cranleigh and Farnham in order to ‘protect’ these settlements. We understand that the Inspector rejected that approach.

In addition to concerns regarding the Green Belt Assessment methodology and the judgements taken forward to the Proposed Submission Local Plan, it would appear that the Council have solely considered whether the assessed parcels of land fulfil the Green Belt purposes rather than consider the need to deliver sustainable patterns of development, as required by paragraph 84 of the NPPF.

The Guildford Borough Settlement Hierarchy (May 2014) forms part of the evidence base that has informed the Guildford Borough Proposed Submission Local Plan (Regulation 19), with the purpose of promoting sustainable development.

Although Guildford Town Centre, Guildford Urban Area and the Ash and Tongham Urban Area are ranked as the three most sustainable settlements and the main areas for development, this does not appear to be reflected in the distribution of development, namely to Tongham.

Guildford Borough Council must ensure that it has sufficiently assessed sites for housing delivery on the edge of such settlements, particularly in locations which are in the Countryside Beyond the Green Belt and which provide the opportunity to deliver sustainable patterns of development. We consider that the Land north of Poyle Road, Tongham provides such an opportunity.

The settlement hierarchy and the Sustainability appraisal identify the sustainable location of the Ash and Tongham Urban Area. The development of the Land north of Poyle Road, Tongham would form an extension to the Tongham Urban Area, a sustainable location and subject to the determination of a live planning application (GBC ref: 17/P/01315) could be considered suitable for ‘development now’.
In light of the five year housing land supply of 2.36 years, the sustainable nature of Tongham and the Land north of Poyle Road, Tongham and its poor performance against the Green Belt purposes it would seem unlikely that exceptional circumstances exist to designate the site as Green Belt.

[Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998]

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

- [Guildford Borough Proposed Submission Local Plan: Representations on behalf of Crownhall Estates Ltd V2.pdf](739 KB)

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**Comment ID:** pslp171/1390  **Respondent:** 17381601 / Madeleine Stevens  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object to Policy 2 at paragraph 4.3.15. Send Business Park should not be inset from greenbelt land. It is in a beautiful quiet rural lane in an area of outstanding natural beauty which is why we all have chosen to live and work here. There is highly restricted vehicular access along Tannery Lane in both directions as it is. This is, and should remain an area of outstanding beautiful countryside adjacent to the Wey Navigation.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp171/1391  **Respondent:** 17381825 / O J S Malhouse  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

The reduction in the number of new homes proposed in the Green Belt after the 2016 Consultation, is welcomed (90 in West Horsley, 1100 in Normandy and Flexford) but this still does not go far enough in reducing the still very large number of new dwellings proposed on Green Belt.

I also object that no changes have been included in the current draft Local Plan despite the strong adverse response to the 2016 Consultation regarding GBC's proposals that East Horsley and West Horsley should be inset from the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp171/1398  **Respondent:** 17382113 / T J Lindsay  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

Section page number 1753 of 1782  Document page number 1754
The changes do not show responsiveness to the weight of public opinion which is heavily against weakening these policies. I object to this. No attempt is made to demonstrate exceptional circumstances feeding in to the proposed figures quoted. Also, the Rural Economic Strategy covered in 4.51 a has as a main aim promoting affordable homes everywhere in the countryside - including in AONB. It could work as a mechanism to produce overdevelopment in the countryside. I object to this and it should be subjected to full public consultation. The three major strategic sites of Blackwell Farm, Wisley Airfield and Gosden Hill Farm are in the Green Belt. I object to them still being put forward. Previous consultations show that in line with the NPPF the public prefer the use of brownfield land in the urban area first for housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

### Comment ID: pslp171/1402  **Respondent:** 17382305 / Brian Austin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is **Sound?** ( ), is **Legally Compliant?** ( )

I object to the policy of insetting villages and removing site A35 from the Metropolitan Green Belt and in particular the imbalance of proposed development which results in proportionately more damage being done to the Green Belt in the North East of the borough. This is the area crucial to the purpose of the Metropolitan Green Belt in containing the spread of London. The retention of site A35 as a strategic site despite its low sustainability rating while dropping site A46 at Normandy exacerbates this imbalance and I object to it as an error of judgement.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

### Comment ID: pslp171/1423  **Respondent:** 17392513 / Katherine Aaronson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is **Sound?** ( ), is **Legally Compliant?** ( )

I also object to the statement under Green Belt Policy P2 (4.3.13) claiming that Flexford, Normandy, and a list of 12 further villages are “now inset from the Green Belt”. This statement is untrue – GBC is proposing that these settlements are inset but a decision has not yet been made by an Inspector, and therefore these villages rightly remain in the Green Belt.

Policies P2, P3 and E5 and sites fail to demonstrate the exceptional circumstances required to develop Green Belt land. Despite the strength of public opinion against a weakening of this policy, 70% of new housing development will be in the countryside, of which, 58% will be in Greenbelt. This is clearly not an exception and no effort is made to demonstrate the previously mentioned exceptional circumstances in line with NPPF requirements.

At a general level, I object to the failure of Policy P2 to appreciate the importance and permanence of the Metropolitan Green Belt, and the need to protect is permanently. The Green Belt is critical to safeguarding our countryside and green spaces, limiting urban sprawl, and preventing towns from merging. It also encourages the recycling of derelict and other brownfield urban sites, helping to assist with urban regeneration. It must be protected and I do not believe Policy P2 adequately reflects this. It also fails to include any assessment of the value of the Green Belt, which is rich in natural and social capital.
Finally, I object to proposals in Policies P1 and E5 weakening protections for AONB which fail to restrict non-major development. This fails to strengthen and in fact weakens protections offered to AONB it is crucial we maintain, and is contrary to the huge weight of public opinion expressed in previous consultations, and the protections made in the NPPF to AONB.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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</table>

Policy 2 Green Belt, paragraph 4.3.15. I object because: it is taking Sends businees park out of Green Belt policy; further expansion/development at this location detracts from the openness and appriateness of green belt and it's protection; it will impact vehicle movement significantly using Tannery Lane; as a non-conforming user within The Green Belt it's expansion should be prevented.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/1529</th>
<th>Respondent: 17402529 / Emma Buswell</th>
<th>Agent:</th>
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<tr>
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Green Belt Policy 2, at paragraph 4.3.15; I object to the proposal to inset Send Business Park from the Green Belt for the following reasons:

It is a non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation.

Tannery Lane, as previously mentioned, is a small country lane which should remain as such and is totally unsuited to increased traffic volume.

Any additional expansion or development in this position will have a significantly detrimental effect on the Green Belt land in this location.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: pslp171/2096</th>
<th>Respondent: 17402625 / R Bhalla</th>
<th>Agent:</th>
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</tbody>
</table>
I also object to the removal from the Green Belt of homes in Guildford Road, Flexford, Palm House Nurseries site, Walden Cottages and Glaziers Lane. The likely high density development will only deteriorate the "openness of Green Belt" and mostly will be used by ‘London Commuters’ thus just becoming a ‘London conurbation’ and not meaningfully benefiting the local area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1553  Respondent: 17404801  Steve Punshon  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

It is proposed that East Horsley is to be “inset” from the Green Belt. This proposed change in settlement boundaries means that the East Horsley settlement area will increase by 37%. At the moment, one hundred houses are proposed near East Horsley station and over two thousand on the former Wisley Airfield, only about one mile from the East Horsley parish boundary. The site at Wisley has recently been increased to now include two more farms!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1617  Respondent: 17407745  Lilijana Howells  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the GBC not adhering to NPPF rules - “The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence” (NPPF Section 9, paragraph 79).

I object to the extension of site A35 (former Wisley Airfield) and its proposed removal from the Green Belt as it is in the centre of the Metropolitan Green Belt, surrounded by countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1621  Respondent: 17408033  Julie Brown  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the changes to Policy P2 Green Belt because they have not addressed many of the 32,000 comments made to the 2016 plan. Policy P2 fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it needs to be permanently protected. The Green Belt is intended to check unrestricted sprawl of built up areas, to prevent neighbouring towns from merging into one another, to safeguard the countryside from encroachment, to preserve
the setting and special character of historic towns, and to assist with urban regeneration by encouraging the recycling of derelict and other urban land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1622  Respondent: 17408033 / Julie Brown  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the removal from the green belt of homes in Guildford Road, northern end of Glaziers Lane, Flexford, Walden Cottages and Palm House Nurseries traveller site because this could enable development within these areas at much higher density and will give greater success for planning applications. Currently these areas contribute to the openness of the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1624  Respondent: 17408065 / Daphne Hollett  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the proposal to inset Send Business Park from the Green Belt. Its in the greenbelt, clear and simple. Coming up with ways for villages and all to meet some quota GBC should be defending us from this short sighted approach, protecting the green belt for us and for future generations and standing up for us. I am not sure how many times we can say that Tannery Lane is a small rural lane with poor access and it simply cannot accommodate more traffic. Send and surrounding villages deal with a lot of traffic and to suggest adding more by finding a way to get this out of the greenbelt (despite the fact its clearly within and surrounded by greenbelt) is unacceptable. Its the thin edge of the wedge and you know it... you start with this and then it simply opens up the option for further development. GBC needs to stop any more intrusion or impact to the greenbelt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1626  Respondent: 17408225 / Jill and Arthur Thomas  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the proposal to inset Send Business Park from the Green Belt because it goes against what the Green Belt means and will spoil the beautiful area of the Wey Navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
**Comment ID:** pslp171/1630  **Respondent:** 17408321 / Graham Legge  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Green Belt, Policy 2 at paragraph 4.3.15**

I object to the proposal to inset Send Business Park from the Green Belt because:

- It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation
- There is highly restricted vehicular access along Tannery Lane in both directions
- Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp171/1639  **Respondent:** 17408865 / Jessica Ferguson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**POLICY P2**

1. The changes to Policy P2 are inconsistent with national policy, primarily the exceptions set out at Paragraph 89 of the NPPF.

2. Whilst part (2) of the policy confirms that certain proposals are not considered inappropriate development as defined by national policy (eg, mineral extraction, engineering operations, etc), there are other types of proposal which, whilst continuing to be ‘inappropriate development’ benefit from a number of policy exceptions. This distinction is corrupted by the drafting through the words “….also meet the following criteria” at the end of part (2) of the policy, which has the effect of wrongly blending exceptions relating to appropriate and inappropriate development.

3. Whilst the policy presently includes ‘Limited infilling’, the drafting effectively reduces the scope of national policy by failing to make explicit that this includes “partial or complete redevelopment of previously developed sites” and the particular criteria attached to this (ie, no greater impact on openness, etc). The policy also omits, without explanation, the provision of facilities for sport and outdoor recreation in the Green Belt. It is not enough to say these are supported by national policy because of the error at part (2), as explained above.

4. The Council is respectfully asked to reconsider its policy following forensic reading and understanding of national policy relating to the control of development in the Green Belt, to ensure that support for proposals in the Green Belt which benefit from exceptions in national policy are not prejudiced.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp171/1643  **Respondent:** 17411649 / Hazel Jones  **Agent:**
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<th>Comment ID: pslp171/1646</th>
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<td>If the calculations for the basic premise of the GBC's submission are incorrect it invalidates all other projections and considerations, particularly the need to build on the Green Belt.</td>
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<td>My other strongest objection is to the four remaining development sites and the perceived need to extend the settlement boundaries of the Horsleys by some 37% into The Green Belt</td>
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<td>This is an excessive increase in housing for two small villages and the land selected is predominately in the NE part of the borough where the Green Belt is most needed to prevent Metropolitan conurbation. The necessary 'exceptional circumstances' to permit this incursion are not proven.</td>
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<td>The GBC local plan is not fit for purpose - it continues to ignore the formally expressed opinions of the vast majority of its constituents, it continues to fail to justify some totally un-businesslike assumptions, it continues to work to flawed demand projections and again fails to justify its intransigence, it refuses to debate critical green belt issues and is clearly signalling easy greenbelt pickings to developers.</td>
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<td>Why would you ignore public opinion in this way - do you really think you know better? A look at Guildford’s planning history over the last 50 years and the current dire state of the town clearly shows that we have been continually let down by your so-called planning experts.</td>
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<td>To insist on limiting responses to changes to the document is in itself non-democratic, and controlling - creating suspicion that you are hell-bent on getting your way regardless and are trying to suppress any kind of debate. It has all the hallmarks of a ‘fix’ and I formally object to GBC behaviour and the changes to the plan.</td>
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4) I OBJECT TO POLICY 2, PARAGRAPH 4.3.15, the proposal to remove Send Business Park from the Green Belt because the site is totally unsuitable for further expansion. The area around the Business Park is beautiful open countryside next to the Wey Navigation, and under no circumstances should be ruined by expanding a business site - if necessary business expansion should be on brownfield sites. The purpose of Green Belt is to protect areas of green open countryside that could otherwise be overlooked, built on and lost to society forever and there is NEVER a reason to
retrospectively remove Green Belt. In addition, there is very limited vehicular access to the site from either direction and the increase in volume of traffic that would necessarily result from expanding the site would cause jams and possibly even accidents. At a minimum this would increase pollution and disrupt the peace and tranquillity of the local environment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1697  Respondent: 17414177 / Ruth Phillips  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The removal of sites A46 and A47 from the 2016 plan meets with our support.

However, we object to the insetting in the Greenbelt as part of the proposed Greenbelt boundary changes as there are no exceptional circumstances which would justify such insetting. This objection includes a further insetting of areas within Normandy and Flexford and of sites A49 and A50.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1715  Respondent: 17414561 / Elliot Rowland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Send Business Park now taken out of the Green Belt altogether

I object to the proposal to inset Send Business Park from the Green Belt because:

- With the new Marina planned on the Wey navigation, removal of this area will facilitate the total erosion of the greenbelt in this area through the infill of further buildings in the future.
- It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation
- There is highly restricted vehicular access along Tannery Lane in both directions as well as limited access to the already busy Send Road.
- Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1736  Respondent: 17415009 / Lightwood Strategic (Lighwood Strategic)  Agent: Roger Daniels

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
(b) Green Belt

The Green Belt inset boundary for Wood Street Village has been drawn very tightly (see Map 3 – in the attached document) to include only the east of the settlement: along Oak Hill east of Pound Lane and west of Pinks Hill; excluding Wood Street Green, the surrounding areas along White Hart Lane and the whole of Frog Grove Lane to the east and north. It is anomalous that the village conservation area, which helps to define the essential character of Wood Street Village, is outside the proposed settlement inset boundary.

The proposed inset boundary would allow for the development of some small sites in Wood Street Village including: land at 148 Broad Street, a site of 0.32 ha previously used for vehicle sales, maintenance and storage, which the Land Availability Assessment (LAA) of February 2016 identified as suitable for 12 dwellings (Site 115); a previously-developed site of 4.4ha with mixed uses at Oak Hill which the LAA identified as suitable for 22 dwellings (Site 35); and land to at ‘Roundoak, White Hart Lane which the LAA identified as suitable for traveller accommodation (Site 2114). These sites enter into the LAA housing figures, although only sites for 23 or more dwellings are shown on the Proposal Map.

The approach to Green Belt insets needs to comply with paragraph 86 of the NPPF which states:

‘If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt.’

Paragraph 85 of the NPPF sets out the proper approach to defining Green Belt boundaries in local plans, which includes ‘consistency with the Local Plan strategy for meeting identified requirements for sustainable development.’ The Council’s Land Availability Assessment (February 2016) demonstrates that the Spatial Development Strategy of Policy S2, is unable to meet the objectively assessed need for housing throughout the plan period, largely because of constraints imposed by Green Belt Policy P2 and related proposals maps. Impacts on housing land supply are considered in more detail below.

The settlement boundary for Wood Street Green appears to have been drawn tightly to restrict development, rather than to allow for housing and other forms of development to take place within the settlement, to meet the changing social and economic needs of the village and the borough.

Not all the open parts of Wood Street Village are important for their contribution to the Green Belt. There are infill sites, such as those previously identified, where development could make a useful contribution to meeting housing needs, consistent with the size and character of Wood Street villages and its local facilities, and without compromising the essential roles of the Metropolitan Green Belt. The Site of Nature Conservation Interest provides a natural boundary to the south of the village. To the north west of the village, it is reasonable to exclude Frog Grove Lane from the inset areas as it is essentially ribbon development extending for over a mile from Oak Hill/Wood Street Green northwards to join the Aldershot Road (A323). A flood risk area and an area of registered common land are also constraints on development on Frog Grove Lane. However, the Green is clearly part of the core of the village and there are areas surrounding the Green that should also be included within the settlement boundary and Green Belt inset and should be allocated for appropriate development.

The inset boundary should therefore be extended westwards to include Wood Street Green, surrounding development and the sites previously identified as ‘Potential Development Areas’ (see Map 2 in the attached document); to allow for appropriate development within the functional boundary of the settlement in accordance with accessibility to local facilities, existing residential development and natural boundaries that can be defined on the ground, including roads and vegetation that would provide long-term, defensible, natural boundaries for the Green Belt.

(c) Conclusions
The need for additional housing land in the early years of the new Local Plan requires looking at a variety of sources and locations, including a more realistic approach to Green Belt Review. Housing need represents one of the exceptional circumstances that can justify alterations to Green Belt boundaries, as described in paragraph 83 of the NPPF. Paragraph 85 of the NPPF sets out the proper approach to defining Green Belt boundaries in local plans which includes consistency with the Local Plan strategy for meeting identified requirements for sustainable development.

The Green Belt & Countryside Study states that it was not seen as pre-empting the Spatial Development Strategy, but in practice Green Belt was a major determinant of the Spatial Development Strategy and, as the Green Belt Review was completed before a full, objective assessment of housing requirements in the SHMA, Green Belt and the Spatial Development Strategy have both become constraints on meeting housing requirements, especially in the early years of the plan.

The Spatial Development Strategy (Policy S2) and Green Belt Policy (Policy P2) are not based on sufficiently positive approaches to reviewing the Green Belt and settlement boundaries and do not give sufficient weight to meeting objectively assessed housing requirements throughout the plan period. They do not comply with the NPPF and cannot therefore be considered to be sound. Modifications to the Plan should include sites such as those identified in Wood Street Village as residential allocations within an extended settlement boundary and Green Belt inset, as described above...

1. Background

1. Lightwood Strategic submitted representations on the Local Plan Issues and Options consultation in November 2013, on the Local Plan Consultation Draft (Regulation 18) in September 2014, and on the Proposed Submission Local Plan Consultation (Regulation 19) in July 2016. This submission updates those representations in response to further consultation on the publication of a revised Proposed Submission Draft (Regulation 19) in June/July 2017.

2. As the Council says that it is only consulting on changes in the current draft Local Plan compared with the previous Regulation 19 Consultation, this report responds to those changes and to new evidence, in particular relating to housing targets and housing land supply. It is in support of duly-made representations which are submitted separately in accordance with Regulation 20 of The Town and Country Planning (Local Planning) (England) Regulations 2012. To make sense of those changes and to comment on the overall soundness of the plan it is necessary to refer to elements of the plan that have not changed.

3. Lightwood Strategic’s representations have consistently expressed concerns about the Council’s proposed approaches to:

   - the objective assessment of housing needs;
   - Green Belt review; and
   - Settlement boundaries in the larger villages, particularly at Wood Street Village.

4. Lightwood Strategic pointed out that there are natural infill sites in Wood Street Village (including the two ‘alternative sites’ shown on Map 1 - see end of document) that can provide SANG and are located only a short distance from the village green, shops and other amenities.

5. The Council identified these two sites in April 2014 as ‘Potential Development Areas’ in its Green Belt & Countryside Study (Map 2 - see end of document). It also undertook analysis of various characteristics of the settlement in its Green Belt & Countryside Study to determine whether it was appropriate to define an inset boundary rather than leave the whole village as ‘washed over’ by the Green Belt.

6. The Council has modified its approach to villages in the Green Belt, in response to the National Planning Policy Framework (March 2012). In the 2003 Local Plan villages were generally ‘washed-over’ by the Green Belt. New Local Plan Policy P2 provides for Wood Street Village and 13 other villages (as well as several, large previously developed sites) to be inset from the Green Belt. In these villages, Policy D4 (Development in Urban Areas and Inset Villages) allows for limited development within strict environmental guidelines.

2. The Green Belt Boundary
7. The inset boundary for Wood Street Village has been drawn very tightly (Map 3 - see end of document) to include only
the east of the settlement: along Oak Hill east of Pound Lane and west of Pinks Hill; excluding Wood Street Green, the
surrounding areas along White Hart Lane and the whole of Frog Grove Lane to the east and north. It is anomalous that the
village conservation area, which helps to define the essential character of Wood Street Village, is outside the proposed
settlement inset boundary.

8. The proposed inset boundary would allow for the development of some small sites in Wood Street Village including:
land at 148 Broad Street, a site of 0.32 ha previously used for vehicle sales, maintenance and storage, which the Land
Availability Assessment (LAA) of February 2016 identified as suitable for 12 dwellings (Site 115); a previously-
developed site of 4.4ha with mixed uses at Oak Hill which the LAA identified as suitable for 22 dwellings (Site 35); and
land to at ‘Roundoak, White Hart Lane which the LAA identified as suitable for traveller accommodation (Site 2114).
These sites enter into the LAA housing figures, although only sites for 23 or more dwellings are shown on the Proposal
Map.

9. The approach to Green Belt insets needs to comply with paragraph 86 of the NPPF which states:
‘If it is necessary to prevent development in a village primarily because of the important contribution which the open
character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If,
however, the character of the village needs to be protected for other reasons, other means should be used, such as
conservation area or normal development management policies, and the village should be excluded from the Green Belt.’

10. Paragraph 85 of the NPPF sets out the proper approach to defining Green Belt boundaries in local plans, which
includes ‘consistency with the Local Plan strategy for meeting identified requirements for sustainable development.’ The
Council’s Land Availability Assessment (February 2016) demonstrates that the Spatial Development Strategy of Policy
S2, is unable to meet the objectively assessed need for housing throughout the plan period, largely because of constraints
imposed by Green Belt Policy P2 and related proposals maps. Impacts on housing land supply are considered in more
detail below.

11. The settlement boundary for Wood Street Green appears to have been drawn tightly to restrict development, rather
than to allow for housing and other forms of development to take place within the settlement, to meet the changing social
and economic needs of the village and the borough.

12. Not all the open parts of Wood Street Village are important for their contribution to the Green Belt. There are infill
sites, such as those previously identified, where development could make a useful contribution to meeting housing needs,
consistent with the size and character of Wood Street village and its local facilities, and without compromising the
essential roles of the Metropolitan Green Belt.

13. The Site of Nature Conservation Interest provides a natural boundary to the south of the village. To the north west of
the village, it is reasonable to exclude Frog Grove Lane from the inset areas as it is essentially ribbon development
extending for over a mile from Oak Hill/Wood Street Green northwards to join the Aldershot Road (A323). A flood risk
area and an area of registered common land are also constraints on development on Frog Grove Lane. However, the
Green is clearly part of the core of the village and there are areas surrounding the Green that should also be included
within the settlement boundary and Green Belt inset and should be allocated for appropriate development.

14. The inset boundary should therefore be extended westwards to include Wood Street Green, surrounding development
and the sites previously identified as ‘Potential Development Areas’ (Map 2 - see end of document); to allow for
appropriate development within the functional boundary of the settlement in accordance with accessibility to local
facilities, existing residential development and natural boundaries that can be defined on the ground, including roads and
vegetation that would provide long-term, defensible, natural boundaries for the Green Belt.

[See appendices for maps]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  Appendices Maps.pdf (1.5 MB)
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<td>• It is a non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation.</td>
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<td>• Tannery Lane, as previously mentioned, is a small country lane which should remain as such and is totally unsuited to increased traffic volume.</td>
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<td>• Any additional expansion or development in this position will have a significantly detrimental effect on the Green Belt land in this location.</td>
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<td>I object to the proposal to inset Send Business Park from the Green Belt because Tannery Lane is very narrow and restricted to one vehicle width in several places. Increased traffic will make the area a danger for drivers. The area is alongside the stunning Wey Navigation and as such the area should be protected from development.</td>
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<td>Send Business Park now taken out of the Green Belt altogether</td>
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<td>I object to the proposal to inset Send Business Park from the Green Belt because further expansion or development at this area detracts from the openness of the Green Belt and is inappropriate. I object as we must protect the unique character of Send and the Wey Navigation which this sort of development could easily deteriorate. The access in and out of Tannery Lane is very bad especially at busy times of day.</td>
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<th>Comment ID: pslp171/1753  Respondent: 17416801 / Angharad Good  Agent:</th>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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</table>
Send Business Park now taken out of the Green Belt altogether
I object to the proposal to inset Send Business Park from the Green Belt because:

• With the new Marina planned on the Wey navigation, removal of this area will facilitate the total erosion of the greenbelt in this area through the infill of further buildings in the future.
• It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation
• There is highly restricted vehicular access along Tannery Lane in both directions as well as limited access to the already busy Send Road.
• Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1758  Respondent: 17417217 / Paul Good  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Green Belt, Policy 2 at paragraph 4.3.15 Send Business Park now taken out of the Green Belt altogether I object to the proposal to inset Send Business Park from the Green Belt because:

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• It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation
• There is highly restricted vehicular access along Tannery Lane in both directions as well as limited access to the already busy Send Road.
• Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1760  Respondent: 17417889 / Rosemary Reynolds  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to policy P2 proposing the insetting of East Horsley from the green belt. The government has promised to protect the green belt and you should heed this. I also object to any movement of the settlement boundary, you have given no reason for this.

I strongly object to site policy A35. You previously gave 14 reasons for your rejection of the proposed development of Wisley airfield. Despite this you have included it in. Your revised plan, why, what has changed

I object to the revised 2017 local plan, the calculation of housing need is opaque it will therefore be challenged.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<tr>
<th>Comment ID: pslp171/1936</th>
<th>Respondent: 17419649 / Fiona Angus</th>
<th>Agent:</th>
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<td>I object to his proposal for a waste management facility in green belt and he associated adverse increase in heavy goods vehicles through the villages of Clandon and Ripley.</td>
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<tr>
<th>Comment ID: pslp171/1826</th>
<th>Respondent: 17419841 / Andrea Fairbairn</th>
<th>Agent:</th>
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<td>Exceptional circumstances must be demonstrated in order to develop Greenbelt yet despite the weight of public opinion against weakening of this policy, 70% of new housing development will be in the countryside, of which, 58% will be in Greenbelt. By definition, this is not an exception and no attempt is made to demonstrate exceptional circumstances, in line with the requirements of the NPPF. Insetting villages is of concern since the restrictions within the settlement boundary raises concerns over loss of character. The Rural Economic Strategy covered in 4.51 a, promoting affordable homes everywhere in the countryside including the AONB as a main aim, is a mechanism for promoting overdevelopment in our countryside. It has not been subject to full public consultation and is based on data, which is not up-to-date.</td>
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<tr>
<td>Three major strategic sites - Blackwell Farm, Wisley Airfield and Gosden Hill Farm - are in the Green Belt. Previous consultations show that, in line with the NPPF, the public would prefer to use brownfield land in the urban area first.</td>
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<th>Comment ID: pslp171/1797</th>
<th>Respondent: 17422881 / Valerie Golding</th>
<th>Agent:</th>
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<tr>
<td>I object to the proposal to inset Send Business Park from the GREEN BELT because: this would enable the development to grow which would be totally out of keeping with the rural location, this old no conforming use is located on one of Guildford Borough’s jewels, the Wey Navigation, and any development would be very detrimental to it. Access to the site from the A247 is by a very narrow lane just one vehicle wide far more suitable for a horse and cart than a forty-four-ton HGV. Any development at this point would detract from the openness of the land (GREEN BELT) around the site.</td>
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<tr>
<th>Comment ID: PSLPP16/7481</th>
<th>Respondent: 17424705 / Keith Brothwell</th>
<th>Agent:</th>
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</table>
I am writing to **object** to the proposals for the above developments. 

I **object** to Send and Ripley villages being removed from the Green Belt with regard to the proposals identified by the Local Plan. Please see below for detailed reasons.

Local Councillors and central government gave a clear election promise to protect the green belt. This reneges on it. I particularly voted in accordance with my wish to preserve the green belt and to ensure that Guildford council had good representation in it. I **feel let down by my local government when I read these proposals**. I choose to live in this area and make a contribution to it (I was not born or brought up here) as I have valued the semi-rural nature and convenience of the landscape but should these proposals go forward I will move out.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: pslp171/1866  Respondent: 17424705 / Keith Brothwell  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the proposal to inset Send Business Park from the Green Belt because this will adversely affect the nature of the surrounding countryside situated so close to the Wey Navigation. Expansion and development of this area goes against Green Belt intentions regarding the openness of the countryside. It is inappropriate.

Access along Tannery Lane is very difficult in both directions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1873  Respondent: 17424737 / Angela Hicks  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Green Belt Policy 2 at paragraph 4.3.15

Send Business Park now taken out of the Green Belt altogether

I object to the proposal to inset Send Business Park from the Green Belt because:

It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation.

There is highly restricted vehicular access along Tannery Lane in both directions.

Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1893  Respondent: 17425217 / Brian John Thomas Perkins  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

General Objections to the Guildford Borough Council Proposed Local Plan (July 2017)

I object to the amended number of new houses required in the borough as it is still much too high and still cannot be, tested or verified objectively.

I object to the fact that the changes to the Local Plan still requires large numbers of new houses to be built on land currently designated as Green Belt.

I object to the fact that, despite changes, the plan still proposes to remove many villages from the green belt and thus allow unrestricted development in the future.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to the GBC not adhering to NPPF rules - “The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence” (NPPF Section 9, paragraph 79).

I object to the extension of site A35 (former Wisley Airfield) and its proposed removal from the Green Belt as it is in the centre of the Metropolitan Green Belt, surrounded by countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to the proposal to inset Send Business Park from the green belt. The business park fronts the River Wey navigation which is acknowledged as protected corridor. The business park is a historical accident arising from a former historic industrial use. Tannery Lane is too restricted for any increase in traffic and the business park should remain within the green belt to inhibit further development. Further development of this area is inappropriate and detracts from the openness of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to the proposal to inset Send Business Park from the Green Belt because:

- It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation.
- There is highly restricted vehicular access along Tannery Lane in both directions.
- Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<th>Comment ID: pslp171/1911</th>
<th>Respondent: 17426593 / Darren Moss</th>
<th>Agent:</th>
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<td>Send Business Park now taken out of the green belt altogether! why?</td>
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<td>It is effectively an old on conforming user in an area of outstanding countryside next to the awry Navigation.</td>
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<td>The site has heavily restricted vehicle access in both directions in a Tannery a Lane.</td>
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<td>Further expansion in this area detracts from the openness of the green belt and is totally inappropriate.</td>
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<td>I am a long term resident of Send and grew up in Merrow. I have seen how the development of Merrow and Burpham has destroyed the character of these villages through poor planning over the last 40 years. Now is the time for this to stop.</td>
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<td>Housing is not a special circumstance to allow building on the Green Belt. There are plenty of brown field sites that can be used.</td>
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<td>For example - Do we need a new furniture megastore in Ladymead?</td>
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<td><strong>Why have you ignored the thousands of objections to these plans? We live here. We should have a say.</strong></td>
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<tr>
<td>Building on the countryside can never be undone. The reason we live in this area, and why we have a wealth of wildlife and tourists from all over the world is because of the Green Belt. GBC should stand up to these inappropriate plans and defend it from the developers at all costs.</td>
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<th>Comment ID: pslp171/1972</th>
<th>Respondent: 17433409 / Julie Iles</th>
<th>Agent:</th>
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1. I object to POLICY P2 (6), specifically the new phrasing ‘Limited infilling may also be appropriate outside the inset or identified settlement boundaries, where it can be demonstrated that the site is as a matter of fact on the ground within the village’ referring to Ockham and Wisley, and by extension to other villages with settlement boundaries. This change in language creates less clarity around the purpose of settlement boundaries as regards development policy. This objection is made in the context of the fact that there is no change to POLICY P2 (5), the intention for East Clandon to have a settlement boundary for the first time, which the Parish Council have previously and still object to.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: pslp171/1964</th>
<th>Respondent: 17433473 / A Winton</th>
<th>Agent:</th>
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I wish to register my objection to the removal from the Green Belt of homes in Guildford Road, northern end of Glaziers Lane, Flexford, Walden Cottages and Palm House Nurseries traveller site, as this could enable development within these areas at a much higher density. These areas contribute to the ‘open-ness of the Green Belt’.

GBC must commit to the improvements that are necessary for the scale of the proposed ten thousand homes that will be built within a ten-mile radius of Normandy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: pslp171/1965</th>
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GBC must commit to the improvements that are necessary for the scale of the proposed ten thousand homes that will be built within a ten-mile radius of Normandy.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp171/1987  **Respondent:** 17434049 / Lucy Starke  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object removing Send Business Park from the Green Belt (4.3.15).

Send Business park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for it’s insetting (removal) from the Green Belt, and indeed GBC have not even attempted one. Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp171/2014  **Respondent:** 17434689 / Anya Williamson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the proposal to inset Send Business Park from the Green Belt for the following reasons:

- It is an old site that should not be further developed because of its location within Green Belt land on the Wey Navigation
- The road network is narrow and restricted, and totally unable to service any new expansion
- Road links to the A3 and elsewhere go directly through the village, which would increase traffic pollution and danger to local residents and children

To summarise, all these developments in Green Belt land have attracted many thousands of objections from local residents - they are not wanted, but more importantly, they are simply not needed. There are many brown field sites throughout the borough that have not been taken advantage of, only because they would not yield as good a profit for developers.

Housing is needed, but it must be built in the right places, not just the most convenient or most profitable, and be accompanied with investment in local services for the huge increase in numbers of people that would come along with the proposed construction. The real tragedy is that were these developments in Send, Send Marsh and Burnt Common allowed to go ahead, the quality of life for existing and new residents alike would be much poorer than it is now. Local roads, schools and medical facilities are already fully stretched. There would be a considerable human cost for hitting government targets.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp171/2015  **Respondent:** 17434753 / Robyn Horsburgh  **Agent:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the assertion in Policy P2 Green Belt para 4.3.13 which would re draw the Green Belt boundary. If fails to appreciate the importance of the Metropolitan Green Belt and that it needs to be permanently protected.

I also object to the removal from Green Belt of homes in Guildford Road, northern end of Glaziers Lane, Flexford, Walden Cottages and Palm House Nurseries traveller site which contribute to the openness of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Send Business Park now taken out of the Green Belt altogether

I object to the proposal to inset Send Business Park from the Green Belt because:

- It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation
- There is highly restricted vehicular access along Tannery Lane in both directions
- Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate

In summary I appreciate and understand the need for additional housing and business in the borough but firmly believe that this plan is not fair particularly toward the residents of Send and Ripley and feel that overall this will be at everyone’s detriment including those new residents planning to move into Ripley and Send. Ripley and Send are already at capacity and I think GBC need to review the draft plan and find another solution that does not have a detrimental effect on existing residents that already struggling for local services that are already stretched.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Policy P2

I object to this policy insofar as it relates to East Horsley.

In amendment 4 in the Appendix H map of East Horsley South the settlement boundary is extended southwards. This land is close, or adjacent, to the AONB in a highly distinctive rural setting which should remain in the Green Belt to protect its character. The current boundary has a defensible boundary, unlike the proposed boundary.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Comment ID: pslp171/2025  Respondent: 17440225 / Louisa Scott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the proposal to inset Send Business Park from the Green Belt because:

- There is highly restricted vehicular access along Tannery Lane in both directions
- Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Comment ID: pslp171/2027  Respondent: 17440385 / Rob Barnes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy 2 paragraph 4.3.15 green belt.

I object to the proposal to inset Send Business Park from the Green Belt. The business park fronts the River Wey navigation which is acknowledged as protected corridor. The business park is a historical accident arising from a former historic industrial use. Tannery Lane is too restricted for any increase in traffic and the business park should remain within the green belt to inhibit further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Comment ID: pslp171/2036  Respondent: 17440705 / Chris Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to removing Send Business Park from the Green Belt (4.3.15).

Send Business Park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for it’s insetting (removal) from the Green Belt, and indeed GBC have not even attempted one.

Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.

If further development is made on this Business Park then the same points arise as those made earlier for point 1, Clockbarn Nursery site with regard to traffic issues.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2150  Respondent: 17445697 / Dorothy M. August  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Green Belt is a policy for controlling urban growth. The idea was developed so as to have a ring of countryside where urbanisation would be resisted, maintaining an area where agriculture, forestry and outdoor leisure could be expected to prevail. The fundamental aim of a Green Belt policy is to prevent urban sprawl by keeping land permanently open, and consequently the most important attribute of Green Belts is their openness.

The Metropolitan Green Belt around London was first proposed by the Greater London Regional Planning Committee in 1935. The Town and Country Planning Act 1947 then allowed local authorities to include Green Belt proposals in their development plans. In 1955, the then Minister of Local authorities around the country were encouraged to protect land around their towns and cities by the formal designation of clearly defined Green Belts, to prevent urban sprawl.

The 2012 National Planning Policy Framework (NPPF) issued by the Government clearly sets out the following purposes (amongst others) for the Green Belt:

• To check the unrestricted sprawl of large built-up areas
• To assist in safeguarding the countryside from encroachment
• To preserve the setting and special character of historic towns

How do you reconcile the Wisley Airfield proposal, and the removal of the Horsleys from the Green Belt, with the NPPF’s guidelines above?

It appears that GBC now wants to ignore the very reason for having designated Green Belts around urban areas, and specifically around my village of East Horsley. I strongly OBJECT to your proposals.

I hope that the GBC, as our elected representatives charged with representing our interests, will listen to opinions voiced in this fourth public consultation: I wish to strongly object to the proposed Guildford Local Plan 2017 based on the points in this letter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2158  Respondent: 17446113 / Phil Davie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. General Evidence and Policies

• Housing Requirement: I OBJECT to the figure of 654 houses required each year between 2015 and 2034 as being too high. Guildford Borough Council will not publish details regarding how this figure was derived. It therefore remains impossible to support the sudden increase in housing numbers from previous annual figures of 322.
Inset Green Belt land: I OBJECT to the proposed inset of Send Business Park from the Green Belt (Green Belt Policy 2 at Paragraph 4.3.15) because

- This is acknowledged by river users as being part of one of the very few quiet stretches along the Wey Navigation. It must be protected from further development.
- The site contains an Area of High Archaeological Potential (AHAP – reference 2003 Guildford Local Plan) which requires significant protection to be continued.
- There are no special or exceptional circumstances identified which justify removal of the Green Belt status.
- Developments in the area will harm the open aspect of the area and views associated with the Wey.
- Access to the site is along very narrow roads which can neither safely support existing traffic nor the additional traffic to be expected both during site development and subsequent use.

Process: I OBJECT to the failure of Guildford Borough Council to allocate housing development proposals evenly among its constituent parts, instead focusing disproportionate development within Send Parish.

Process: I OBJECT to the failure of Guildford Borough Council to recognise and act on the large number of objections relating to proposals for Send and made during the 2016 consultation activity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2560  Respondent: 17446113 / Phil Davie  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Inset Green Belt land: I OBJECT to the proposed inset of Send Business Park from the Green Belt (Green Belt Policy 2 at Paragraph 4.3.15) because

- This is acknowledged by river users as being part of one of the very few quiet stretches along the Wey Navigation. It must be protected from further development.
- The site contains an Area of High Archaeological Potential (AHAP – reference 2003 Guildford Local Plan) which requires significant protection to be continued.
- There are no special or exceptional circumstances identified which justify removal of the Green Belt status.
- Developments in the area will harm the open aspect of the area and views associated with the Wey.

Access to the site is along very narrow roads which can neither safely support existing traffic nor the additional traffic to be expected both during site development and subsequent use.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2164  Respondent: 17446305 / Sybill Jubb  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the 2017 new local plan.

It includes the provision for Guildford to expand by 20% to 25%. In order to meet the resulting development needs, it proposes the release of Green Belt as well as building at very high densities in the town.
This will have significant impact on the town, in particular the destruction of Guildford’s historic and green character, and increased pressures on already stretched infrastructure (in particular from increased traffic).

The Borough must have a local plan and further development is accepted, but it must be based on a realistic assessment of future expansion and housing needs.

The plan allows for a total of 659 new homes per annum (13,893 over the period of the plan) but it seems this target is based on calculations and assumptions that have never been made public. Also, an independent analysis carried out on behalf of the Guildford Residents’ Association (by a respected national expert who worked for the Government) has concluded that these figures are based on an overestimate of future population growth and will result in needless loss of Green Belt and green character, and increased congestion, that cannot be justified in our heavily constrained borough.

The planned Gosden Hill development is of particular concern. It will put increased pressures on an area, principally Burpham, which is already blighted by severe traffic congestion and the proposed vehicle access plans do not do nearly enough to address this issue.

The Council has a responsibility to revisit the plan, in particular the basis for making provision for Guildford to expand by 20%-25% and the projected housing needs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp171/2165  **Respondent:** 17446433 / Clive Phillips  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Please find below my comments on the proposed revised local plan.

a) No changes are being proposed since the 2016 Consultation to insetting West and East Horsley from the Green Belt.

b) Flawed evidence continues to be relied on to justify over expansion

c) No improvements proposed for sustainability and to infrastructure for the proposed development sites in the Horsleys. Already heavily congested and very poorly maintained, local roads will become gridlocked.

d) The Green Belt should be protected for everybody’s future - and development sites can and should be utilised within the town centre rather than retail space.

I trust that you will seriously consider my comments

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp171/2179  **Respondent:** 17446497 / Maggi Moss & Patrick Daffarn  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Please see below our response to the final Guildford Local Plan consultation:
1. Plans to expand Guildford by 20 to 25% appear to be based on an error. In view of this flawed new evidence, Guildford’s proposal for more than 12,426 homes, plus a buffer of 1,155 homes, is excessive and will result in needless loss of Green Belt and the green character of the area in addition to increased congestion that cannot be justified in our already heavily constrained borough.

2. There is compelling evidence that Guildford’s population growth has been greatly overestimated by about 40% because of under-recording of students leaving at the end of their studies.

3. If the Council fails to apply Green Belt protection or constrain expansion to reflect widespread, legitimate environmental and transport constraints, the 2017 Plan will cause harm to the qualities that underpin the economic success of Guildford and aggravate congestion.

4. Allocating too much land for development in the 2017 Plan and releasing so much Green Belt for development could result in Guildford being required to provide for Woking’s unmet housing needs on our Green Belt thus sacrificing our Green Belt to protect that of Woking. This is folly given the existing constraints in Guildford, a gap town with constricted roads set in the Surrey Hills AONB. We do not need to sacrifice so much Green Belt or allow town cramming.

5. Even taking account of all the proposals in the 2017 Plan, congestion which is already severe is set to get worse over the Plan period.

6. The revised proposal that only 60% of full time Guildford based students will be provided with accommodation on campus puts unnecessary pressure on housing stock in the town. An 80% target could help by freeing up affordable homes relatively quickly.

We support the need for a Plan but not one based on flawed figures, inadequate infrastructure and destruction of Guildford’s green character. The Plan needs to be reconsidered.

We hope you will take our responses into consideration in the final consultation.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp171/2198  **Respondent:** 17447137 / Paul Simons  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I am extremely disappointed by the response to the vast number of objections regarding the planned number of houses to be built in the Green Belt received during the last consultation. Whilst almost 2000 house have been removed it still leaves a very large number of dwellings in the Green Belt.

Together with the plan to build far more houses than is either required or is sustainable in many areas of the borough, it is unacceptable and hypocritical to begin the plan with the fallacious comments about protecting the precious Green Belt.

This, together with the changes made in the current plan means the Eastern side of the borough is now scheduled to take an even greater share of new homes in the Green Belt. The plan to build surplus houses in this area makes it probable that this over provision of homes would be acquired by Woking residents and not Guildford residents.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp171/2206  **Respondent:** 17447329 / Justin Rowland  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I am extremely disappointed by the response to the vast number of objections regarding the planned number of houses to be built in the Green Belt received during the last consultation. Whilst almost 2000 house have been removed it still leaves a very large number of dwellings in the Green Belt.

Together with the plan to build far more houses than is either required or is sustainable in many areas of the borough, it is unacceptable and hypocritical to begin the plan with the fallacious comments about protecting the precious Green Belt.

This, together with the changes made in the current plan means the Eastern side of the borough is now scheduled to take an even greater share of new homes in the Green Belt. The plan to build surplus houses in this area makes it probable that this over provision of homes would be acquired by Woking residents and not Guildford residents.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Green Belt, Policy 2 at paragraph 4.3.15
Send Business Park now taken out of the Green Belt altogether
I object to the proposal to inset Send Business Park from the Green Belt because:

• With the new Marina planned on the Wey navigation, removal of this area will facilitate the total erosion of the greenbelt in this area through the infill of further buildings in the future.
• It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation
• There is highly restricted vehicular access along Tannery Lane in both directions as well as limited access to the already busy Send Road.
• Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

The draft plan still proposes that 57% of new housing will be built on land that is currently categorised as Greenbelt, land that was supposed to be protected for future generations to be used for the enjoyment of many (not just local residents). This protected land will be lost forever and the development proposed will simply allow the spread of Greater London, please for the sake of current and future residents and visitors to the area consider the views of the many.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2287  Respondent: 17455585 / Victor Truscott  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Green Belt Policy 2 paragraph 4.3.15 the proposal to inset Send Business Park from the Green Belt because of the narrow vehicular access at either end of Tannery Lane. Any further additions to the Business Park would ruin the openness of the countryside and detract from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2415  Respondent: 17459617 / Renaissance Classics (Keith Sohl)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Brownfield Sites A4 and A34 have been removed from the Local Plan – meaning there is more pressure on Green Belt sites to meet the so-called housing “need”. This should be rectified as these sites would be adequate for the developments proposed and indeed are more suitable in terms of convenience and access to town facilities than Green Belt sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2446  Respondent: 17462145 / John Maycock  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Green Belt and Insetting of Village Boundaries
Despite the volume of comments received, I object to the fact that no change has been made to the proposal that the Horsleys are both removed from the Green Belt and that the settlement boundaries be extended at the same time. I can welcome the reduction by 90 in the number of new homes projected for West Horsley but the draft Plan still proposes far too many new homes on Green Belt Land and, additionally, the east side of the Borough is now to take an even greater proportion of these. Why is Guildford not following the choice of many other Councils to constrain its overall housing growth to protect Green Belt? Even the new reduced objectively assessed housing target will by 2034 (the end of the Plan Period) mean that Guildford will have grown by nearly 25%, which is nearly double the prediction for the growth of Guildford made by the Office for National Statistics.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: pslp171/3285  Respondent: 17467233 / Guildford College Group (Guildford College Group)  Agent: Indigo Planning (Daniel Andrews)

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Council’s Green Belt Assessment does not seem to have been revisited since the previous round of public consultation on the Proposed Submission Local Plan and therefore we continue to question the robustness of this evidence base document. We believe if this assessment was undertaken correctly, the conclusion would to allocate Liddington Hall ahead of other sites identified in the emerging Plan.

We continue to raise issues with the:

• Over-reliance on Green Belt sensitivity scoring in Green Belt site selection. The main criticism is that where a land parcel has been assessed as having a high Green Belt sensitivity (in the case of Liddington Hall where it scores 3 out of 4) then the site has been removed as a potential site allocation, whatever the site environmental and or sustainability scoring might be or where it might fall in the Council’s spatial hierarchy;

• Lack of comprehensive and transparent evidence base. We believe the scoring system adopted by the Council is overly simplistic leading to a binary outcome for each Green Belt purpose. No supporting information which explains or qualifies how the conclusions have been reached has been included.

• Incorrect Green Belt Scoring for land at Liddington Hall. Even using this simple methodology adopted by the Council, the Green Belt and Countryside Study has incorrectly scored Liddington Hall (land parcel J1) in respect of two of the purposes of the Green Belt, namely the prevention of Guildford and Fairlands from merging and the restriction of urban sprawl.

Therefore, the Council should re-consider land at Liddington Hall alongside the other Guildford urban extension sites (Blackwell Farm, Gosden Hill farm and Keens lane) having regard to its sustainability or environmental capacity and certainly ahead of allocations such as Wisley (which are lower down the settlement hierarchy and are in less sustainable locations).

We request an amendment to the supporting text to draft Policy 2 as follows:

Para 4.3.15 The following major previously developed sites are now inset from the Green Belt: Henley Business Park, HM Prison Send, Keogh Barracks, Mount Browne, Pirbright Barracks, Pirbright Institute, the University of Law Guildford and Merrist Wood College.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  
22680003  Land at Liddington Hall Part1.pdf (1.2 MB)
22680001  Draft Policy 2.pdf (408 KB)

Comment ID: pslp171/3262  Respondent: 17580289 / Linda Carter  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Despite Guildford Borough Council’s policy statement that it will seek to protect the Green belt from inappropriate development, 65% of the new housing is still set to be in the Green Belt, contrary to NPPF requirements stating ‘exceptional circumstances’.
In 4.3.13 of this policy it is stated that 14 villages are now ‘inset’ (removed) from the Green Belt. This is incorrect as it is only a proposal in the Plan and therefore presumptions in favour of developments in these areas of Green Belt cannot be made.

The insetting of villages and the extension of settlement boundaries is opposed as it further erodes the Green Belt and makes them vulnerable to over-development. The Green belt provides a buffer to urban sprawl and stops villages coalescing physically and visually into concrete conurbations. Guildford Borough Council recognises this for the villages of Ash and Tongham where it emphasises the need for restrained development and retention of the green corridor between Ash/Tongham and Aldershot. Insetting, infilling and changing settlement boundaries of a large number of villages will invite future further insetting if the Green Belt policy is not strengthened and enforced.

I object to Policy P2.

Whilst there is a small reduction in numbers of new homes in the Green belt from the 2016 Plan, there are still a very large number in the Green Belt and the eastern rural part of the Borough has by far the greatest and disproportionate number allocated compared to the other parts of the Borough when percentage allocation is applied.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

Document part: Policy P3 - Countryside
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/11410</th>
<th>Respondent: 8559297 / Holy Trinity Amenity Group (Robert Bromham)</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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</table>

**P3. Countryside, P52.**

We assume that this policy relates to a small area of land, but we cannot find this on the policies map. Some clarification is needed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/1793</th>
<th>Respondent: 8561377 / The Guildford Society (Julian Lyon)</th>
<th>Agent:</th>
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</thead>
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</table>

**POLICY P3– Countryside -**

> The Guildford Society has no comment to make on the amendments to Policy P3.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17430</th>
<th>Respondent: 8563201 / West Horsley Parish Council (Sam Pinder)</th>
<th>Agent:</th>
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<tr>
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**P3 - Countryside**

**Report page:** 14

**WHPC view:** No objections

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
POLICY P3: Countryside

WHPC has no objections to this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  [WHPC Draft Local Plan response July 2016.pdf (2.2 MB)]

I object to policy P3 Countryside (i.e. beyond the Green Belt) This is more protective – as a policy – than the proposals for the AONB and the Green Belt, so is anomalous. I am not in favour of building on any green fields if brownfield, previously developed land is used efficiently (without garden-grabbing). This policy refers to the countryside near Ash and Tongham (see paragraph 4.3.28). This area does not justify stronger policy protection than any other part of the borough. The fact that the current and previous Council Leaders represent it should not give it preferential status: “we will seek to limit any development in the countryside unless it can be demonstrated that it is necessary in that location”. Green Belt and AONB areas should by definition have higher levels of protection than non-Green Belt areas. It should also be noted that Ash and Tongham lie beyond Guildford far away from London and therefore make no contribution to controlling Metropolitan urban sprawl, which is presumably why Ash and Tongham are not in the Green Belt already. This policy, however, attaches higher priority to preventing the “coalescence between the Ash and Tongham urban area and Aldershot” than it does to the primary purpose of the Metropolitan Green Belt, which is to stop London sprawl. I agree to the prevention of coalescence but this should apply to all villages including East and West Horsley and Flexford and Normandy.

I would agree to additional Greenbelt if it is merited and if an area on the same stretch that actually warrants AONB status were not under threat of massive development (Blackwell Farm 1,800). The treatment of different areas lacks parity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th><strong>Policy P3: Countryside</strong></th>
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<tr>
<td>(4.3.35 Paragraph intentionally blank)</td>
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<tr>
<td>Comments relating to 4.3.17 apply ie The characteristics of the Hog's back run in an East/West direction and it is nonsensical to remove vast swathes of Greenbelt to facilitate coalescence at the Guildford end (Blackwell Farm) whilst adding Greenbelt at the Ash end, to prevent coalescence with a much smaller area? There is an obvious lack of consistency here and concerns raised</td>
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</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<table>
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<tr>
<th><strong>Comment ID:</strong> PSLPP16/13040  <strong>Respondent:</strong> 8573793 / Harry Eve  <strong>Agent:</strong></th>
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<td>I object</td>
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</table>

63. While I support the protection of countryside from development and the creation of additional Green Belt, this policy is inconsistent with the plan to remove large areas of Green Belt elsewhere and increase the physical and visual coalescence of other parts of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<table>
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<tr>
<th><strong>Comment ID:</strong> PSLPP16/5953  <strong>Respondent:</strong> 8575585 / Ian Macpherson  <strong>Agent:</strong></th>
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<tr>
<td>Policy P3: Countryside</td>
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</table>

This worthy statement does not seem entirely to accord with current local practice. There is substantial development approved, applied for or planned in the broad 'countryside' by Ash/Tongham/Aldershot, and perhaps greater clarity is called for?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<table>
<thead>
<tr>
<th><strong>Comment ID:</strong> PSLPP16/6993  <strong>Respondent:</strong> 8575617 / Effingham Parish Council (Ian Symes)  <strong>Agent:</strong></th>
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</table>
Policy P3

I object to this policy. The NPPF gives no special protection to this area, this policy effectively gives more protection to this area than to the Green Belt, which, according to the NPPF, is supposed to be protected against development. The NPPF says that new Green Belt should only be established in exceptional circumstances, for example when planning for larger scale development such as new settlements or major urban extensions. Neither of these forms of development is planned for the Ash and Tongham area, whilst the areas of Green Belt in the east of the Borough proposed for removal in fact protect against the ever sprawling London conurbation and the encroachment of urban Guildford into the countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Of relevance to Rushmoor, mindful of the allocations around Ash and Tongham, Policy P3 (Countryside) is predicated on the need to ensure that there is no further encroachment into the countryside designation to the west and south of the urban area of those settlements. It notes specifically that any further proposals for development beyond those permitted and allocated would only be allowed provided they would not lead to a greater physical or visual coalescence between the Ash and Tongham urban area and Aldershot. The reasoned justification supporting Policy P3 states that,

"Any development proposals which compromise the integrity of the gap that separates the Ash and Tongham urban area with neighbouring Aldershot will be resisted."

In the context of the strategic allocation for residential development on land to the south and east of Ash and Tongham, Rushmoor Borough Council welcomes the inclusion of Policy P3 in the draft Plan, and the recognition of the importance of the gap between the Ash and Tongham urban area and Aldershot.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** pslp171/950  **Respondent:** 8595777 / Ash Green Residents Association (Paul Povey)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P3

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road

- Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road
- 4.3.29 Amend: "Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough's second largest urban area. Given its relative sustainability, a Countryside to the south and east within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development."
- 4.3.30 Amend: "We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green."
- Policy P3 Amend: (1) (c) should be amended to read "does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.

Regrettably the Local Plan continues to incorrectly identify the boundary of Ash Green. Ash Green Residents Association made a detailed response to the 2014 Local Plan Consultation and in particular raised their concerns that GBC’s settlement boundary of Ash Green was incorrect and excluded the northern part of the village. AGRA also raised concerns regarding the boundary of the Ash & Tongham Urban Area (previously known as the Ash & Tongham Strategic Location for Growth) and its potential for coalescence with Ash Green. These concerns are detailed in our comments to Policy 11 of the 2014 Local Plan and we attach a copy at Appendix A for your information.

The Ash Green settlement boundary inaccuracy together with the Ash & Tongham Urban Area boundary inaccuracy are still present in the 2017 Draft Local Plan. We therefore ask that our 2014 comments are taken into account when considering the correct settlement boundary of Ash Green, the boundary of the Ash & Tongham Urban Area and a suitable area of separation between them.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
4.3.29 Amend: "Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough's second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development."

4.3.30 Amend: "We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green."

Policy P3 Amend: (1) (c) should be amended to read "does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.

Attached documents: [AGRA 2017 Local Plan Response PDF.pdf](#) (1.7 MB)
unless it can be demonstrated that it is necessary in that location'. Contrast this with all the site allocations and insetting in Normandy and Flexford taken without regard for their proximity to SPA and special protections for habitats and wildlife SNCI status etc or any attempt to justify exceptional circumstances. This is inconsistent and legally unsound.

Heritage Assets

There are other inconsistencies. Policy A36 has a requirement to ensure the Grade II listed building on the site is not harmed. Policy A46 has no requirement to mitigate the harm to the Grade II listed buildings by the site, one within 25m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11191  Respondent: 8602337 / Cross Group (Mr Colin Cross)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy P3 - Countryside

I believe brownfield sites in all areas, including AONB, should be utilised and all areas in the borough should provide some affordable and Rural Exception Homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17508  Respondent: 8607169 / CPRE Surrey Branch & Guildford District (Tim Harrold)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY P3 Countryside

CPRE supports the need for a policy that protects countryside outside the Green Belt from development and greater physical and/or visual coalescence between settlements. We also recommend an additional introductory sentence calling for “the landscape character of the countryside outside the areas covered in Policy P2 to be protected and enhanced, and any new development to be designed and sited to minimise any adverse impact on this character”. This phrasing has been successfully used in another district plan in Surrey to cover the same issue. It is suggested that the policy wording to be used might usefully be discussed with Waverley, if this has not already been done, as they have a far larger area of “land beyond the Green Belt” to consider than Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
+ CPRE is concerned about the development of countryside beyond the Green Belt. Policy RE4 of the Guildford Borough Local Plan has been progressively disregarded because of the pressure to develop Ash and Ash Vale. We maintain that every effort should be made in particular to protect the village of Ash Green, with its heritage buildings, against the current proposals for its progressive phased development (Application 17/P/00513). We estimate that the existing boundary of the Surrey Hills Area of Outstanding Natural Beauty is less than a mile from the site under consideration and is due for review by Natural England in 2018. Views to and from the AONB are an important material consideration that also needs to be taken into account in this policy.

+ CPRE is concerned about the “relative sustainability” claimed for the road infrastructure in this area (4.3.29). Because of the development of Aldershot and Farnborough in Rushmoor District outside Guildford Borough, and the growth of Ash and Ash Vale, which now is to be extended to include Tongham, we maintain that making this “a strategic location for development” will add unacceptably to existing traffic congestion on the A323 in particular and the A31 Hogs Back as well.

+ CPRE recognizes that the existing policy may need to be amended but does not believe that the policy proposals made are acceptable, and still require further review.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID: PSLPP16/10074**  **Respondent:** 8640353 / Julian Cranwell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

We object to this policy, taken in the light of the other policies proposed within the local plan.

There is huge emphasis on provision both of services and of additional Green Belt in Ash and Tongham. We object to this policy. It is not clear why new Green Belt should be designated here, while the Green Belt is being rolled back in all other areas of the borough. The only notable fact is that the Leader of the Council and other Executive members are based in this area and the question of impartiality does need to be raised.

Note that in the recent judicial review in relation to Ashdown Forest, the SANG zone for the Ashdown Forest SPA was 7km, and this gave rise to a lower housing number than that proposed by this local authority.

The urban areas of Ash and Tongham are indeed of importance within the borough, creating a barrier between the countryside of Guildford and the urban towns of Aldershot and Farnborough.

However, as noted, it does not seem entirely appropriate to seek to reduce Green Belt designation everywhere else in the borough, on the grounds of overwhelming housing need (which is itself not an exceptional circumstance) – including land within the Green Belt and the Thames Basin Heath SPA, but then to propose designating additional Green Belt in this particular area.
If the planning policy is sufficiently aggressive as to disregard existing Green Belt, to propose significant development in that area, then it is inappropriate, and in contravention of existing planning law, (Gallagher Homes v Solihull as determined by the Court of Appeal) to consider proposing new areas for Green Belt. It is unclear why the strategic gap that separates the Ash and Tongham urban areas from neighbouring Aldershot is of greater significance to the borough as a whole, than other threatened Green Belt villages and fields.

The desire to protect the strategic gap between Ash and Tongham and Ash Green is welcomed, and provided that this does not arise because of a loss of Green Belt land elsewhere, the proposal to include some of this land within the Green Belt is welcomed too. However, Green Belt boundaries should not be traded off. One village community should not benefit to the detriment of another. The proposed extension of Green Belt designation to Ash and Tongham is unlikely to succeed, because it is not inherently better at serving the purposes of the Green Belt than other areas threatened by development, and a similar attempt in Solihull was wholly unsuccessful. The Court of Appeal decision will represent a precedent in this regard.

As noted in Gallagher Homes v Solihull, the NPPF is based on PPG2 which is quoted in a similar context to this proposal:

“If such an alteration is proposed the Secretary of State will wish to be satisfied that the authority has considered opportunities for development within the urban areas contained by and beyond the Green Belt.”

In other words, before altering Green Belt boundaries (to use for building), land beyond the Green Belt should be considered as building land first; and first of all, brownfield urban land should be used. Provided that the Green Belt is not subject to the wholesale assault then this extension might be acceptable to the wider community within the borough. It will not be acceptable as a trade-off for loss of the Green Belt elsewhere.

Policy P3 States that ‘development will only be permitted permitted provided it:

- “requires a countryside location or where a rural location can be justified, and
- is proportionate to the nature and scale of the site, its setting and countryside location, and
- does not lead to greater physical or visual coalescence between the Ash and Tongham urban area and Aldershot”.

We would like to know what the rural justification of proposed housing has for Ash and Tongham and how Guildford Borough Council proves that contributes to the rural economy? In the Local Plan, Guildford Borough Council refers to these Eastern Borough proposals as ‘extensions to urban boundaries’. Developments of 1241 and 91 homes cannot possibly meet the necessary term ‘rural justification’ (The site allocation maps show different figures of 1200, 62, 58 homes)

As far as we can tell with the corresponding maps, the proposed developments in Ash and Tongham will create a greater coalescence between the separate villages to combine them into one urban area with a slither of green space between it and the A331/Aldershot.

Designation of Green Belt does not guarantee a barrier between Ash and Ash Green as Guildford has demonstrated the urge to move the Green Belt boundaries in communities elsewhere. We would suggest removing the allocation of further Green Belt designation as it does not follow NPPG Policy. There are no exceptional circumstances to allow changes in Green Belt Boundaries in Guildford.

It is also not clear what the impact will be of designating SANG in this area, and whether this will be used to permit building on Green Belt or land otherwise protected because of the Thames Basin Heath SPA designation elsewhere.

Ash and Tongham have countryside designated Ancient Woodland, AGLV and SNCI and a sensitive historic site which must be protected. This, together with a focus on using existing brownfield within the urban settlement area and a more realistic housing number, should succeed in protecting the valuable countryside around Ash and Tongham, while the attempt to adjust Green Belt boundaries seems doomed to failure and therefore will allow wholesale overdevelopment in this area.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/2307  **Respondent:** 8671969 / Valerie Thompson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**P3 Countryside**

This is another appalling policy, directed towards protecting specific areas in which some of the more influential Councillors live.

I object to this misuse of Councillors’ powers as new greenbelt is to be created and the areas of Ash and Tongham, which are not at present in the greenbelt will not be inset, and will have greater protection from development. This policy is immoral.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/1543  **Respondent:** 8687041 / Michael Aaronson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

I OBJECT to this area having stronger protection than the Green Belt areas. However I do not support building on green fields in this area any more than anywhere else.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/1071  **Respondent:** 8687265 / Dagero Ltd (David Roberts)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**POLICY P3 – Countryside (i.e. beyond the Green Belt)**

I OBJECT. This is more protective – as a policy – than the proposals for the AONB and the Green Belt, so is anomalous and wrong. I am not in favour of building on this area, since urban, brownfield areas are sufficient to meet all reasonable housing targets. There is no need to build on any green fields if brownfield, previously developed land is used efficiently (without garden-grabbing).
This policy refers to the countryside near Ash and Tongham (see paragraph 4.3.28). This area does not justify stronger policy protection than any other part of the borough. The fact that the current and previous Council Leaders represent it should not give it preferential status: “we will seek to limit any development in the countryside unless it can be demonstrated that it is necessary in that location”. Green Belt and AONB areas should by definition have higher levels of protection than non-Green Belt areas.

It should also be noted that Ash and Tongham lie beyond Guildford far away from London and therefore make no contribution to controlling Metropolitan urban sprawl, unlike those villages which, ironically, are to be “inset”. That is presumably why Ash and Tongham are not in the Green Belt already. This policy, however, attaches higher priority to preventing the “coalescence between the Ash and Tongham urban area and Aldershot” than it does to the primary purpose of the Metropolitan Green Belt, which is to stop London sprawl.

Apart from being a scandalous misuse of local political patronage, this policy effectively says, “Look, we are not destroying the Guildford Green Belt because we are extending it in Ash and Tongham.” It is a cynical piece of tokenism. The leader of the Council needs to be seen to be above reproach by deleting this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2623  Respondent: 8693153 / Vicki Willetts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY P3 (COUNTRYSIDE BEYOND THE GREEN BELT): • Gives Ash and Tongham more protection than rest of borough, including existing Green Belt. But they don’t contribute to preventing London sprawl. • Special treatment of ward represented by current Council Leader and his predecessor. Politically biased. • A minor extension of Green Belt in one place does not justify its major destruction elsewhere (the inset villages).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11228  Respondent: 8708289 / Frances King  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Countryside (ie beyond the Green Belt): I OBJECT This appears to give stronger protection to an area beyond the Green Belt and outside the AONB than within those areas (the Green Belt and AONB); this is anomalous. It is noted, perhaps cynically, that this happens to include the wards of the Borough that the present leader and immediate past leader of the Council represent. Why should these be given extra protection when other much more rural parts of the Borough have their protection reduced.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11230  Respondent: 8708289 / Frances King  Agent:
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<th>Respondent: 8728865 / Neville Bryan</th>
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Object

Why are GBC removing Greenbelt in most of the borough while adding it back in Ash?

Exceptional circumstances have not been demonstrated anywhere to remove or add Greenbelt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16911  Respondent: 8728865 / Neville Bryan  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Object

Not clear why we are removing Greenbelt in most of the borough while adding it back in Ash. Exceptional circumstances have not been demonstrated anywhere to remove or add Greenbelt. We hope it’s purely co-incidental that the current and immediate past leadership of Guildford Council and a significant number of the Executive reside in the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2049  Respondent: 8729217 / Karen Stevens  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

I object to the changes to policy P3, particularly the statement in para 4.3.28 “it is nevertheless important that we seek to manage growth in this area”, which shows a bias towards protecting the countryside beyond the green belt (near Ash and Tongham) above other areas with more important landscape designations.

Whilst I do not see the need to build on the countryside beyond the green belt (if constraints are applied to the OAN and housing is built more densely on brownfield sites), GBC appears to be more protective of this area than it is of AONB or the green belt, and this is contrary to the NPPF, which states that national parks and AONBs should have the highest level of protection.

The policy seems to attach greater importance to preventing the “coalescence between Ash and Tongham urban area and Aldershot” than it does to the primary purpose of Metropolitan Green belt, which is to stop London sprawl. Ash and Tongham lie beyond Guildford at a distance from London and therefore do not fulfil this purpose. That is presumably why Ash and Tongham are not in the green belt already. It also seems that GBC is more concerned about the coalescence between Ash & Tongham and Aldershot than it is between Guildford and Woking, or between Flexford and Guildford, or between Wood Street Village and Guildford.

In the 2014 version of the Plan, the reason given for extending the green belt to Ash and Tongham was that this would protect important views from the Hog’s Back ridge, but this justification was changed to “preventing coalescence” after it
was pointed out that Blackwell Farm equally protected the views from the ridge. It appears that policies (and elements of the evidence base) are being adapted to ensure that certain sites are included in the Local Plan (and others excluded), rather than using sound evidence and policies as a starting point to determine which are the most suitable locations for development. The whole approach to the Local Plan is therefore unsound.

“The Hog’s Back Chalk Ridge landscape should be conserved, in particular the open nature of the landscape which forms a backdrop to the surrounding rural areas and Guildford, the wide and far ranging views from the many viewpoints along the ridge line and the sparse settlement pattern of traditional style and local materials. The intact large scale geometric field pattern and hedgerow boundaries and hedgerow trees should be conserved while there is potential to enhance and reinforce some of the hedgerows.” - Guildford Landscape Character Assessment

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/2006  Respondent: 8748801 / N J Norton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Paras 4.3.28 – 4.3.31
I object to all changes in Introduction, p59, paragraphs 4.3.28, 4.3.29, 4.3.30 and 4.3.31 as they ease the path to more intensive development rather than maintaining a degree of protection to countryside that contributes to views into and out of the Surrey Hills AONB area of the Hogs Back.

I propose paragraphs 4.3.28, 4.3.29, 4.3.30 and 4.3.31 revert to their original content as follows:
"4.3.28 The borough has areas of countryside near Ash and Tongham that is not designated Green Belt. Whilst this land does not carry the same weight in national planning policy as Green Belt in terms of resisting development, it is nevertheless important that we seek to manage change growth in this area. 4.3.29 Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second urban area. The sustainability of this area combined with its preference in the spatial hierarchy means a further extension of the urban area, using some countryside, is allocated for development. 4.3.30 We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identify of Ash and Tongham.

4.3.31 The countryside lies immediately to the west and south of the urban area and forms the natural boundary of the Blackwater Valley. The Blackwater Valley contains the A331, which connects the A31 and Tongham in the south with Ash Vale in the north and Frimley beyond. It also provides an important open gap between Ash and Tongham, and the town of Aldershot to the west.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16308  Respondent: 8749409 / Mrs Randall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
At 4.3.29 it states that due to “the sustainability of the area......... a further extension of the urban area, using some countryside (my emphasis), is allocated for development”. It is not some countryside – it is a substantial part of the countryside remaining in the area which is being earmarked for potential development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/328  Respondent: 8794881 / Leslie Garthwaite  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P3  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road

- 4.3.29 Amend: “Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development.”

- 4.3.30 Amend: “We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green.”

- Policy P3 Amend: (1) (c) should be amended to read “does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

4.3.29 Amend: “Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development.”

4.3.30 Amend: “We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green.”

Policy P3 Amend: (1) (c) should be amended to read “does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.”

Attached documents:

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Comment ID: PSLPP16/18627  Respondent: 8804833 / Brian Yeomans  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy P3: Green Belt

I OBJECT to this policy.

This policy is much weaker than previous protection. It is dependent on the Surrey Hills Management Plan which welcomes housing development. The Surrey Hills needs much more substantial protection. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated. P3

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6767  Respondent: 8826145 / William Hewlett  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

2. Comments relating to Policy P3: Countryside (i.e. outside the Green Belt)

- I OBJECT to the fact that the Plan gives Ash and Tongham more protection than rest of borough, including existing Green Belt, even though they don’t contribute to preventing London sprawl. (Could this be politically biased special treatment of villages represented by current Council Leader and his predecessor?!).
- A minor extension of Green Belt in one place does not justify its major destruction elsewhere (the inset villages).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15764  Respondent: 8836129 / Roger Shapley  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

This seems more protective – as a policy – than the proposals for the AONB and the Green Belt which is anomalous. We think that the brownfield areas within the urban area are sufficient to meet all reasonable housing targets. There should be no need to build on any green fields if ‘brownfield’ (previously developed) land is used efficiently.

However, we do not think this area justifies stronger policy protection than any other part of the borough. This policy refers to the area of countryside near Ash and Tongham (see paragraph 4.3.28). The fact that the current and previous Council Leaders represent this area should not give it preferential status: “we will seek to limit any development in the countryside unless it can be demonstrated that it is necessary in that location”. Green Belt and AONB areas should – by definition - have higher levels of protection than non-Green Belt areas, which is not the case with this policy.

This policy attaches higher priority to preventing the “coalescence between the Ash and Tongham urban area and Aldershot” than it does to the primary purpose of the Metropolitan Green Belt, which is to stop London sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/16217  Respondent: 8839041 / Jon Maslin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to policy P3 Countryside (i.e. beyond the Green Belt)

This is more protective – as a policy – than the proposals for the AONB and the Green Belt, so is anomalous. I am not in favour of building on this area, since urban, brownfield areas are sufficient to meet all reasonable housing targets. There is no need to build on any green fields if brownfield, previously developed land is used efficiently (without garden-grabbing).

This policy refers to the countryside near Ash and Tongham (see paragraph 4.3.28). This area does not justify stronger policy protection than any other part of the borough. The fact that the current and previous Council Leaders represent it should not give it preferential status: ‘we will seek to limit any development in the countryside unless it can be demonstrated that it is necessary in that location’. Green Belt and AONB areas should by definition have higher levels of protection than non-Green Belt areas.

It should also be noted that Ash and Tongham lie beyond Guildford far away from London and therefore make no contribution to controlling Metropolitan urban sprawl, that is presumably why Ash and Tongham are not in the Green Belt already. This policy, however, attaches higher priority to preventing the ‘coalescence between the Ash and Tongham urban area and Aldershot’ than it does to the primary purpose of the Metropolitan Green Belt, which is to stop London sprawl. I agree to the prevention of coalescence but this should apply to all villages including East and West Horsley and Flexford and Normandy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13184  Respondent: 8840449 / David Wilson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY P3: Countryside

8.1. I am a supporter of extending the Green Belt. However, I OBJECT to extensions of the Green Belt in some areas (Ash and Tongham) when you are simultaneously effectively removing the Green Belt from other areas, without a convincing argument as the merits of the former against the disbenefits of the latter, in relation to each of the specific affected areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18181  Respondent: 8843361 / Adrian Atkinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to policy P3 Countryside (i.e. beyond the Green Belt) On reading this is clearly a more protective than the proposals for the AONB and the Green Belt, so is anomalous and wrong. I feel that urban, brownfield areas are there to meet all reasonable housing targets so there is no need to build on any green fields if brownfield, previously developed land is used efficiently. This policy refers to the countryside near Ash and Tongham (see paragraph 4.3.28). This area does not justify stronger policy protection than any other part of the borough. The fact that the current and previous Council Leaders represent it should not give it some sort of guilt edge status. It states that “we will seek to limit any development in the countryside unless it can be demonstrated that it is necessary in that location”. This is stronger than that for the Green Belt and AONB areas, which should, by definition, have higher levels of protection than non-Green Belt areas. It should also be noted that Ash and Tongham lie beyond Guildford far away from London and therefore should not be seen as part of the London Metropolitan Green Belt. Why protect some fields so far away from London yet take out areas of Green belt which are much closer to London and should contribute more to the control of Metropolitan London into the countryside. There is no planning policy reason for the attachment of higher priority to preventing the “coalescence between the Ash and Tongham urban area and Aldershot” than to Metropolitan Green Belt in the north east of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1954  Respondent: 8848033 / Paul Gerrard  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

4.3.28 Just a very minor grammar correction. Should be “… areas of countryside near Ash and Tongham that ARE not designated…”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3197  Respondent: 8850433 / Ian Doherty  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I have no objections to this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13326  Respondent: 8850945 / Richard Bayes  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY P3: Countryside

I have no objections to this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/3279  Respondent: 8856769 / Marion Howells  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

[text of attachment reproduced below]

I would ask that Ash Green not be considered to be part of the Ash and Tongham Urban Area and that the boundary should thus not extend south of Ash Green Road and Foreman road. Maps for many years have suggested that Ash Green Road and Foreman Road are part of Ash Green and should not therefore be joined to Ash.

4.3.30 should in fact say: “We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve its role in maintaining a separate identity for Ash, Tongham and Ash Green.

I have lived in this area for almost 70 years and this area has up to now consisted of four small areas, Ash, Ash Green, Ash Vale and Tongham. All these areas have grown substantially in recent years. Whereas it is appreciated that there must be some development in the areas to make this growth sustainable the Council must address the need for suitable infrastructure improvements before further development is considered. This appears to be put on the backburner as the local area expands and is now extremely urgent.

If we are to have local growth I for one would wish to protect the remaining countryside around it from inappropriate development in order to retain some sort of character to the area and in particular to preserve the role it plays in maintaining the separate identify of Ash, Tongham and Ash Green. Please let us not turn this area into a large urban sprawl with no individual identity for different villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2508  Respondent: 8858113 / Ramsey Nagaty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

the heading is Countryside yet the GBC statements are predominantly relating to Ash and Tongham. No justification is given for extending greenbelt at sh and Tongham yet removing it from Blackwell far. Is it because the lead councillor lives in Ash and Tongham?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to this policy, taken in the light of the other policies proposed within the local plan.

There is huge emphasis on provision both of services and of additional Green Belt in Ash and Tongham. We object to this policy. It is not clear why new Green Belt should be designated here, while the Green Belt is being rolled back in all other areas of the borough. The only notable fact is that the Leader of the Council and other Executive members are based in this area and the question of impartiality does need to be raised.

Note that in the recent judicial review in relation to Ashdown Forest, the SANG zone for the Ashdown Forest SPA was 7km, and this gave rise to a lower housing number than that proposed by this local authority.

The urban areas of Ash and Tongham are indeed of importance within the borough, creating a barrier between the countryside of Guildford and the urban towns of Aldershot and Farnborough.

However, as noted, it does not seem entirely appropriate to seek to reduce Green Belt designation everywhere else in the borough, on the grounds of overwhelming housing need (which is itself not an exceptional circumstance) – including land within the Green Belt and the Thames Basin Heath SPA, but then to propose designating additional Green Belt in this particular area.

If the planning policy is sufficiently aggressive as to disregard existing Green Belt, to propose significant development in that area, then it is inappropriate, and in contravention of existing planning law, (Gallagher Homes v Solihull as determined by the Court of Appeal) to consider proposing new areas for Green Belt. It is unclear why the strategic gap that separates the Ash and Tongham urban areas from neighbouring Aldershot is of greater significance to the borough as a whole, than other threatened Green Belt villages and fields.

The desire to protect the strategic gap between Ash and Tongham and Ash Green is welcomed, and provided that this does not arise because of a loss of Green Belt land elsewhere, the proposal to include some of this land within the Green Belt is welcomed too. However, Green Belt boundaries should not be traded off. One village community should not benefit to the detriment of another. The proposed extension of Green Belt designation to Ash and Tongham is unlikely to succeed, because it is not inherently better at serving the purposes of the Green Belt than other areas threatened by development, and a similar attempt in Solihull was wholly unsuccessful. The Court of Appeal decision will represent a precedent in this regard.

As noted in Gallagher Homes v Solihull, the NPPF is based on PPG2 which is quoted in a similar context to this proposal:

“If such an alteration is proposed the Secretary of State will wish to be satisfied that the authority has considered opportunities for development within the urban areas contained by and beyond the Green Belt.”

In other words, before altering Green Belt boundaries (to use for building), land beyond the Green Belt should be considered as building land first; and first of all, brownfield urban land should be used. Provided that the Green Belt is not subject to the wholesale assault then this extension might be acceptable to the wider community within the borough. It will not be acceptable as a trade-off for loss of the Green Belt elsewhere.

Policy P3 States that ‘development will only be permitted provided it:

- requires a countryside location or where a rural location can be justified, and
- is proportionate to the nature and scale of the site, its setting and countryside location, and
• does not lead to greater physical or visual coalescence between the Ash and Tongham urban area and Aldershot’.

We would like to know what the rural justification of proposed housing has for Ash and Tongham and how Guildford Borough Council proves that contributes to the rural economy? In the Local Plan, Guildford Borough Council refers to these Eastern Borough proposals as ‘extensions to urban boundaries’. Developments of 1241 and 91 homes cannot possibly meet the necessary term ‘rural justification’ (The site allocation maps show different figures of 1200, 62, 58 homes)

As far as we can tell with the corresponding maps, the proposed developments in Ash and Tongham will create a greater coalescence between the separate villages to combine them into one urban area with a slither of green space between it and the A331/Aldershot.

Designation of Green Belt does not guarantee a barrier between Ash and Ash Green as Guildford has demonstrated the urge to move the Green Belt boundaries in communities elsewhere. We would suggest removing the allocation of further Green Belt designation as it does not follow NPPG Policy. There are no exceptional circumstances to allow changes in Green Belt Boundaries in Guildford.

It is also not clear what the impact will be of designating SANG in this area, and whether this will be used to permit building on Green Belt or land otherwise protected because of the Thames Basin Heath SPA designation elsewhere.

Ash and Tongham have countryside designated Ancient Woodland, AGLV and SNCI and a sensitive historic site which must be protected. This, together with a focus on using existing brownfield within the urban settlement area and a more realistic housing number, should succeed in protecting the valuable countryside around Ash and Tongham, while the attempt to adjust Green Belt boundaries seems doomed to failure and therefore will allow wholesale overdevelopment in this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2421  Respondent: 8858433 / Eric Peters  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy P3 - Countryside (Beyond the Green Belt)
I object . There is no need to build on greenfield sites if brownfield sites are used efficiently.

Why not build in Ash and Tongham rather than extend the Green Belt here. Surely the existing Green Belt and Areaa of Outstanding Natural Beauty should be more protected than these new areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2215  Respondent: 8860897 / Julia Shaw  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3
Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( )
I OBJECT to this policy as it stands. There is huge emphasis on provision both of services and of additional Green Belt in Ash and Tongham. It is not clear why new Green Belt should be designated here, while the Green Belt is being rolled back in all other areas of the borough. The only notable fact is that the Leader of the Council and other Executive members are based in this area and the question of impartiality does need to be raised.

Note that in the recent judicial review in relation to Ashdown Forest, the SANG zone for the Ashdown Forest SPA was 7km, and this gave rise to a lower housing number than that proposed by this local authority.

The urban areas of Ash and Tongham are indeed of importance within the borough, creating a barrier between the countryside of Guildford and the urban towns of Aldershot and Farnborough.

However, as noted, it does not seem entirely appropriate to seek to reduce Green Belt designation everywhere else in the borough, on the grounds of overwhelming housing need (which is itself not an exceptional circumstance) – including land within the Green Belt and the Thames Basin Heath SPA, but then to propose designating additional Green Belt in this particular area.

If the planning policy is sufficiently aggressive as to disregard existing Green Belt, to propose significant development in that area, then it is inappropriate, and in contravention of existing planning law, (Gallagher Homes v Solihull as determined by the Court of Appeal) to consider proposing new areas for Green Belt. It is unclear why the strategic gap that separates the Ash and Tongham urban areas from neighbouring Aldershot is of greater significance to the borough as a whole, than other threatened Green Belt villages and fields.

The desire to protect the strategic gap between Ash and Tongham and Ash Green is welcomed, and provided that this does not arise because of a loss of Green Belt land elsewhere, the proposal to include some of this land within the Green Belt is welcomed too. However, Green Belt boundaries should not be traded off. One village community should not benefit to the detriment of another. The proposed extension of Green Belt designation to Ash and Tongham is unlikely to succeed, because it is not inherently better at serving the purposes of the Green Belt than other areas threatened by development, and a similar attempt in Solihull was wholly unsuccessful. The Court of Appeal decision will represent a precedent in this regard.

As noted in Gallagher Homes v Solihull, the NPPF is based on PPG2 which is quoted in a similar context to this proposal:

“If such an alteration is proposed the Secretary of State will wish to be satisfied that the authority has considered opportunities for development within the urban areas contained by and beyond the Green Belt.”

In other words, before altering Green Belt boundaries (to use for building), land beyond the Green Belt should be considered as building land first; and first of all, brownfield urban land should be used. Provided that the Green Belt is not subject to the wholesale assault then this extension might be acceptable to the wider community within the borough. It will not be acceptable as a trade-off for loss of the Green Belt elsewhere.

Policy P3 States that ‘development will only be permitted provided it:

“requires a countryside location or where a rural location can be justified, and is proportionate to the nature and scale of the site, its setting and countryside location, and does not lead to greater physical or visual coalescence between the Ash and Tongham urban area and Aldershot”.

I would like to know what the rural justification of proposed housing has for Ash and Tongham and how Guildford Borough Council proves that contributes to the rural economy? In the Local Plan, Guildford Borough Council refers to these Eastern Borough proposals as ‘extensions to urban boundaries’. Developments of 1241 and 91 homes cannot possibly meet the necessary term ‘rural justification’ (The site allocation maps show different figures of 1200, 62, 58 homes)
As far as I can tell with the corresponding maps, the proposed developments in Ash and Tongham will create a greater coalescence between the separate villages to combine them into one urban area with a slither of green space between it and the A331/Aldershot.

Designation of Green Belt does not guarantee a barrier between Ash and Ash Green as Guildford has demonstrated the urge to move the Green Belt boundaries in communities elsewhere. I would suggest removing the allocation of further Green Belt designation as it does not follow NPPG Policy. There are no exceptional circumstances to allow changes in Green Belt Boundaries in Guildford.

It is also not clear what the impact will be of designating SANG in this area, and whether this will be used to permit building on Green Belt or land otherwise protected because of the Thames Basin Heath SPA designation elsewhere.

Ash and Tongham have countryside designated Ancient Woodland, AGLV and SNCI and a sensitive historic site which must be protected. This, together with a focus on using existing brownfield within the urban settlement area and a more realistic housing number, should succeed in protecting the valuable countryside around Ash and Tongham, while the attempt to adjust Green Belt boundaries seems doomed to failure and therefore will allow wholesale overdevelopment in this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2341  Respondent: 8876673 / Tony Thompson  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy P3 Countryside ( beyond the Green Belt )

I OBJECT to proposals that seem to give Ash and Tongham additional Green Belt that has stronger protection than other parts of the Borough. Coupled with the disproportionate weighting of development in the East of the borough compared to the West it inevitably leads to the suspicion that politicians who live in the West are adjusting plans to their own advantage.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16967  Respondent: 8893057 / Dianne Garnett  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1.1 We object to policy P3 Countryside (i.e. beyond the Green Belt)

1.2 This is more protective – as a policy – than the proposals for the AONB and the Green Belt, so is anomalous and wrong. We are not in favour of building on this area, since urban, brownfield areas are sufficient to meet all reasonable housing targets. There is no need to build on any green fields if brownfield, previously developed land is used efficiently (without garden-grabbing).
1.3 This policy refers to the countryside near Ash and Tongham (see paragraph 4.3.28). This area does not justify stronger policy protection than any other part of the borough. The fact that the current and previous Council Leaders represent it should not give it preferential status: “we will seek to limit any development in the countryside unless it can be demonstrated that it is necessary in that location”. Green Belt and AONB areas should by definition have higher levels of protection than non-Green Belt areas. 1.4 It should also be noted that Ash and Tongham lie beyond Guildford far away from London and therefore make no contribution to controlling Metropolitan urban sprawl, unlike those villages which, ironically, are to be “inset”. That is presumably why Ash and Tongham are not in the Green Belt already. This policy, however, attaches higher priority to preventing the “coalescence between the Ash and Tongham urban area and Aldershot” than it does to the primary purpose of the Metropolitan Green Belt, which is to stop London sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/14754</th>
<th>Respondent: 8896161 / Carol Wilson</th>
<th>Agent:</th>
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<tr>
<td>POLICY P3: Countryside</td>
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</table>

I am a supporter of extending the Green Belt. However, I OBJECT to extensions of the Green Belt in some areas (Ash and Tongham) when you are simultaneously effectively removing the Green Belt from other areas, without a convincing argument as the merits of the former against the disbenefits of the latter, in relation to each of the specific affected areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/7999</th>
<th>Respondent: 8901825 / Raymond Woolfson</th>
<th>Agent:</th>
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16. I object to Policy P3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/8152</th>
<th>Respondent: 8902465 / Linda Slater</th>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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</tr>
</tbody>
</table>
I OBJECT TO POLICY P3 (COUNTRYSIDE BEYOND THE GREEN BELT):

- Gives Ash and Tongham more protection than rest of borough, including existing Green Belt. But they don’t contribute to preventing London sprawl.
- Special treatment of ward represented by current Council Leader and his predecessor. Politically biased.
- A minor extension of Green Belt in one place does not justify its major destruction elsewhere (the inset villages).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1883  Respondent: 8902913 / Jessica Povey  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road

4.3.29 Amend to: “Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development.”

4.3.30 Amend to: “We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green.”

Policy P3 Amend to: (1) (c) should be amended to read “does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

4.3.29 Amend to: “Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development.”

4.3.30 Amend to: “We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green.”

Policy P3 Amend to: (1) (c) should be amended to read “does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.”

Attached documents:

Comment ID: pslp171/1041  Respondent: 8908193 / David Wyatt  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

4.3.29 Amend: “Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second largest urban area. Given its relative sustainability, Countryside to the south and east of the urban area within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development.”

4.3.30 Amend: “We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green.”

Policy P3 Amend: (1) (c) should be amended to read “does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.”

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

4.3.29 Amend: “Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development.”

4.3.30 Amend: “We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green.”

Policy P3 Amend: (1) (c) should be amended to read “does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.”

**Attached documents:**
Comment ID: PSLPP16/9522  Respondent: 8918657 / Tim Handley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I also wish to OBJECT TO POLICY P3 (COUNTRYSIDE BEYOND THE GREEN BELT) and was very disappointed to note that the proposed LP gives Ash and Tongham more protection than the rest of borough, including existing Green Belt, although these villages do not contribute to preventing London sprawl – unlike East and West Horsley, Ockham etc. Without wishing to be cynical, I would question whether due process has been followed in developing the draft Plan where there appears to be special treatment of a ward represented by the current Council Leader and his predecessor. With questions around politically bias, the draft Plan should not be approved as it is currently drawn.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3526  Respondent: 8919521 / Susan Hughes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY P3 – Countryside (i.e. countryside beyond the Green Belt) OBJECT. I understand that the identified brownfield areas within the urban area are sufficient to meet all reasonable housing targets and therefore there should be no need to build more homes in the countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15139  Respondent: 8926529 / Annie Cross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy P3 - Countryside

I believe brownfield sites in all areas, including AONB, should be utilised and all areas should provide some affordable and Rural Exception Homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1917  Respondent: 8928097 / Sue Wyeth-Price  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )


Policy P3 - Countryside

Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

4.3.29 should be amended to: “Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development.”

4.3.30 should be amended to: “We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green.”

Policy P3 (1) (c) should be amended to: “does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Policy P3 (1) (c) should be amended to: “does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.”

Attached documents:

Comment ID: PSLPP16/63  Respondent: 8929057 / East Horsley Parish Council (Nick Clemens)  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY P3: Countryside

We have no objections to this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16040  Respondent: 8941761 / FLGCA (Paul Kassell)  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
FLAG welcomes the creation of new Green Belt to prevent urban sprawl and supports this policy. We would also comment that the wording here is much better than the protection of AONB or the Green Belt itself – would it be possible to ask whoever wrote this to have a go at the previous two?

Having said that, we cannot understand the relevance of the monitoring of appeals for developments within inset villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9369  Respondent: 8948385 / Gillian Eve  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy P3: Countryside

I OBJECT. There should be no need to build on any countryside if brownfield, previously developed land is used efficiently. There is no justification for making an exception of Ash and Tongham and giving them greater protection than existing Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16156  Respondent: 8948385 / Gillian Eve  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/3341  Respondent: 8961409 / Norman Bristow  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy P3 - Countryside
• Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road
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Attached documents:

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<th>Comment ID: pslp171/3340</th>
<th>Respondent: 8966177 / Michael Bryant</th>
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Attached documents:

**Comment ID:** PSLPP16/7324  **Respondent:** 8971233 / Tim J. Harrold  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**POLICY P3 Countryside**

CPRE supports the need for a policy that protects countryside outside the Green Belt from development and greater physical and/or visual coalescence between settlements. We also recommend an additional introductory sentence calling for "the landscape character of the countryside outside the areas covered in Policy P2 to be protected and enhanced, and any new development to be designed and sited to minimise any adverse impact on this character". This phrasing has been successfully used in another district plan in Surrey to cover the same issue. It is suggested that the policy wording to be used might usefully be discussed with Waverley, if this has not already been done, as they have a far larger area of "land beyond the Green Belt" to consider than Guildford.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
### Comment ID: PSLPP16/13122  Respondent: 8993121 / Shelagh Yeomans  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Policy P3: Green Belt**

I OBJECT to this policy.

This policy is much weaker than previous protection. It is dependent on the Surrey Hills Management Plan which welcomes housing development. The Surrey Hills needs much more substantial protection. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

### Comment ID: PSLPP16/8672  Respondent: 9050337 / Nigel Geary  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I have no objections to this policy.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

### Comment ID: PSLPP16/11432  Respondent: 9062913 / Susan Parker  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**POLICY P3 – Countryside (ie countryside beyond the Green Belt)**

OBJECT. This seems more protective – as a policy – than the proposals for the AONB and the Green Belt which is anomalous. Note – I am not in favour of building on this area. I think that the brownfield areas within the urban area are sufficient to meet all reasonable housing targets. There should be no need to build on any green fields if brownfield (previously developed) land is used efficiently. (That does not mean garden-grabbing!).

However, I do not think this area justifies stronger policy protection than any other part of the borough. This policy refers to the area of countryside near Ash and Tongham (see paragraph 4.3.28). The fact that the current and previous Council Leaders represent this area should not give It preferential status: “we will seek to limit any development in the countryside unless it can be demonstrated that it is necessary in that location”. Green Belt and AONB areas should – by definition - have higher levels of protection than non-Green Belt areas, which is not the case with this policy.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
I OBJECT. This seems more protective – as a policy – than the proposals for the AONB and the Green Belt, which is anomalous. I am not in favour of building on this area – the brownfield areas within the urban area are sufficient to meet all reasonable housing targets. There should be no need to build on any green fields if brownfield (previously developed) land is used efficiently. (That does not mean garden-grabbing!). However, I do not think this area justifies stronger policy protection than any other part of the borough. This policy refers to the area of countryside near Ash and Tongham (see paragraph 4.3.28). The fact that the current and previous Council Leaders represent this area should not give it preferential status: “we will seek to limit any development in the countryside unless it can be demonstrated that it is necessary in that location”. Green Belt and AONB areas should – by definition - have higher levels of protection than non-Green Belt areas, which is not the case with this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

POLICY P3 – Countryside (i.e. beyond the Green Belt)

I OBJECT. This is more protective – as a policy – than the proposals for the AONB and the Green Belt, so is anomalous and wrong. I am not in favour of building on this area, since urban, brownfield areas are sufficient to meet all reasonable housing targets. There is no need to build on any green fields if brownfield, previously developed land is used efficiently (without garden-grabbing).

This policy refers to the countryside near Ash and Tongham (see paragraph 4.3.28). This area does not justify stronger policy protection than any other part of the borough. The fact that the current and previous Council Leaders represent it should not give it preferential status: “we will seek to limit any development in the countryside unless it can be demonstrated that it is necessary in that location”. Green Belt and AONB areas should by definition have higher levels of protection than non-Green Belt areas.

It should also be noted that Ash and Tongham lie beyond Guildford far away from London and therefore make no contribution to controlling Metropolitan urban sprawl, unlike those villages which, ironically, are to be “inset”. That is presumably why they are not in the Green Belt already. This policy, however, attaches higher priority to preventing the “coalescence between the Ash and Tongham urban area and Aldershot” than it does to the primary purpose of the Metropolitan Green Belt.

Apart from being a scandalous case of local political patronage, this policy effectively says, “Look, we are not destroying the Guildford Green Belt because we are extending it in Ash and Tongham.” It is a cynical piece of tokenism.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
3. I object to the congestion that the development will cause to the local village roads and the lack of road structure improvement (Policy P3).

The roads around Clandon, Send and Ripley are already congested with frequent long lines of traffic queuing. Narrow roads such as Newark Lane and Rose Lane already struggle with the present amount of traffic.

Crossing the road as a pedestrian in these villages can be dangerous.

Walking from Grove Heath North to the High Street in Ripley requires crossing Rose Lane often between cars waiting in this road turning left or right into the High Street. This crossing of Rose Lane is not pedestrian friendly and one day someone will get hurt or killed. Any further increase in traffic will only make matters worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I OBJECT TO POLICY P3 (COUNTRYSIDE BEYOND THE GREEN BELT):

- Gives Ash and Tongham more protection than rest of borough, including existing Green Belt. But they don’t contribute to preventing London sprawl.
- Special treatment of ward represented by current Council Leader and his predecessor. Politically biased.
- A minor extension of Green Belt in one place

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
OBJECT. This seems more protective – as a policy – than the proposals for the AONB and the Green Belt which is anomalous. I think that the brownfield areas within the urban area are sufficient to meet all reasonable housing targets. There should be no need to build on any green fields if brownfield (previously developed) land is used efficiently. (That does not mean garden-grabbing!).

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/18376</th>
<th>Respondent: 10799169 / Neal Basson</th>
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<th>Comment ID: PSLPP16/17526</th>
<th>Respondent: 10799425 / Guildford Greenbelt Group (Susan Parker)</th>
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We object to this policy, taken in the light of the other policies proposed within the local plan.

There is huge emphasis on provision both of services and of additional Green Belt in Ash and Tongham. We object to this policy. It is not clear why new Green Belt should be designated here, while the Green Belt is being rolled back in all other areas of the borough. The only notable fact is that the Leader of the Council and other Executive members are based in this area and the question of impartiality does need to be raised.

Note that in the recent judicial review in relation to Ashdown Forest, the SANG zone for the Ashdown Forest SPA was 7km, and this gave rise to a lower housing number than that proposed by this local authority.
The urban areas of Ash and Tongham are indeed of importance within the borough, creating a barrier between the countryside of Guildford and the urban towns of Aldershot and Farnborough.

However, as noted, it does not seem entirely appropriate to seek to reduce Green Belt designation everywhere else in the borough, on the grounds of overwhelming housing need (which is itself not an exceptional circumstance) – including land within the Green Belt and the Thames Basin Heath SPA, but then to propose designating additional Green Belt in this particular area.

If the planning policy is sufficiently aggressive as to disregard existing Green Belt, to propose significant development in that area, then it is inappropriate, and in contravention of existing planning law, (Gallagher Homes v Solihull as determined by the Court of Appeal) to consider proposing new areas for Green Belt. It is unclear why the strategic gap that separates the Ash and Tongham urban areas from neighbouring Aldershot is of greater significance to the borough as a whole, than other threatened Green Belt villages and fields.

The desire to protect the strategic gap between Ash and Tongham and Ash Green is welcomed, and provided that this does not arise because of a loss of Green Belt land elsewhere, the proposal to include some of this land within the Green Belt is welcomed too. However, Green Belt boundaries should not be traded off. One village community should not benefit to the detriment of another. The proposed extension of Green Belt designation to Ash and Tongham is unlikely to succeed, because it is not inherently better at serving the purposes of the Green Belt than other areas threatened by development, and a similar attempt in Solihull was wholly unsuccessful. The Court of Appeal decision will represent a precedent in this regard.

As noted in Gallagher Homes v Solihull, the NPPF is based on PPG2 which is quoted in a similar context to this proposal:

“If such an alteration is proposed the Secretary of State will wish to be satisfied that the authority has considered opportunities for development within the urban areas contained by and beyond the Green Belt.”

In other words, before altering Green Belt boundaries (to use for building), land beyond the Green Belt should be considered as building land first; and first of all, brownfield urban land should be used. Provided that the Green Belt is not subject to the wholesale assault then this extension might be acceptable to the wider community within the borough. It will not be acceptable as a trade-off for loss of the Green Belt elsewhere.

Policy P3 States that ‘development will only be permitted provided it:

- “requires a countryside location or where a rural location can be justified, and
- is proportionate to the nature and scale of the site, its setting and countryside location, and
- does not lead to greater physical or visual coalescence between the Ash and Tongham urban area and Aldershot”.

We would like to know what the rural justification of proposed housing has for Ash and Tongham and how Guildford Borough Council proves that contributes to the rural economy? In the Local Plan, Guildford Borough Council refers to these Eastern Borough proposals as ‘extensions to urban boundaries’. Developments of 1241 and 91 homes cannot possibly meet the necessary term ‘rural justification’ (The site allocation maps show different figures of 1200, 62, 58 homes).

As far as we can tell with the corresponding maps, the proposed developments in Ash and Tongham will create a greater coalescence between the separate villages to combine them into one urban area with a slither of green space between it and the A331/Aldershot.

Designation of Green Belt does not guarantee a barrier between Ash and Ash Green as Guildford has demonstrated the urge to move the Green Belt boundaries in communities elsewhere. We would suggest removing the allocation of further Green Belt designation as it does not follow NPPG Policy. There are no exceptional circumstances to allow changes in Green Belt Boundaries in Guildford.
It is also not clear what the impact will be of designating SANG in this area, and whether this will be used to permit building on Green Belt or land otherwise protected because of the Thames Basin Heath SPA designation elsewhere.

Ash and Tongham have countryside designated Ancient Woodland, AGLV and SNCI and a sensitive historic site which must be protected. This, together with a focus on using existing brownfield within the urban settlement area and a more realistic housing number, should succeed in protecting the valuable countryside around Ash and Tongham, while the attempt to adjust Green Belt boundaries seems doomed to failure and therefore will allow wholesale overdevelopment in this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Policy P3 - Countryside

- Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road
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Attached documents:

Comment ID: pslp171/1349  Respondent: 10805761 / Russ McPhillips  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I write to you in respect of the Guildford borough Proposed Submission Local Plan: strategy & sites and include my comments and objections specifically relating to Ash Green.

Policy P3-Countryside and A29 (land to the south and east of Ash and Tongham.

Ash Green IS a rural area. We are next to Ash which is urban. Looking at the Ordnance Survey map you can see how built up Ash is. We are at extreme risk of loosing our rural identity as Ash is expanding with ever increasing development. With the proposed A29 policy this will merge the two areas of Ash and Ash Green together and we WILL loose part of Ash Green. How can it even be possible to take away part of the community area or divide a village?

Looking at the draft map where the blue line has been drawn, it segregates the greenest part of the village into the Ash and Tongham Urban Area (ATUA). This will destroy the rural part of Ash Green and we will loose that part of the countryside.

Ash Green is not part of the ATUA and the boundary must not extend south of Ash Green and Foreman Road.

Ash Green also has historical importance. The area of Ash Manor was originally a historical farmstead called Manor Farm and on old maps this was and should still be in Ash Green. The local plan even lists in it’s key considerations ‘the historical location of Ash Green’.

I have recently attended an open surgery with our local MP for Surrey Health, Michael Gove. We raised our concerns to him of the threat to our community by the GBC’s proposed Local Plan and the divide of Ash Green. He appeared very interested and assured us he was going to look into this further.

Aware that Mr Gove is also Environment secretary we stressed our concerns to him at the threat of loss to Ash Greens’ intrinsic rural character of it’s countryside location. We are also very close to the Surrey Hills Area of outstanding Natural Beauty (AONB).

To quote Michael Gove in June 2017 (Channel 4 news) on his new role as environment secretary..
Our countryside does need protecting, we are slowly losing it to development. I am fully aware of the need for more housing and accept smaller scale and appropriate development in this area but even the council (as documented in their draft plan) suggests the need to support rural communities and to protect the remaining countryside.

I would like to object to the current wording in your policy of P3 and A29 (land to the south and east of Ash Tongham) as it does not give us any protection. I totally understand the need for new housing but it needs to be affordable for key workers and currently there are many new builds not being sold and in my opinion too expensive for such workers. Myself and my partner are key workers and would not afford the current prices of these new builds.

Please include in your Local Plan these revised paragraphs (as suggested by Ash Green Residents Association) for Policies P3, A29, and requirements 6 & 8 to protect Ash Green as a rural community from over development, ensuring appropriate infrastructure and recognising it’s historical location and intrinsic, rural character

| 4.3.29 Amend to: “Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development.” |
| 4.3.30 Amend to: “We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green.” |

Policy P3 Amend to: (1) (c) should be amended to read “does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Suggested amendments:

Please include in your Local Plan these revised paragraphs (as suggested by Ash Green Residents Association) for Policies P3, A29, and requirements 6 & 8 to protect Ash Green as a rural community from over development, ensuring appropriate infrastructure and recognising it’s historical location and intrinsic, rural character

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Policy P3 Amend to: (1) (c) should be amended to read “does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.”

Attached documents:

| Comment ID: pslp171/1369 | Respondent: 10805953 / Elaine Boyes | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P3 |
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I’d like to firstly object to Policy P3, Countryside.

Ash Green is not part of the Ash and Tongham Urban Area (ATUA). It is a rural community and historically always has been. Many old maps such as the Tythe Map and Ordnance survey maps dating back as far as 1871 shows the original Ash Green incorporating Ash Green Road and Ash Manor.

Ash Green is a rural area, you get that sense when you live, walk or drive around it. The roads, especially down Ash Green Road are narrow and rural. Ash Manor is indicated in Ash Green on the historical maps. This used to be a farm called Manor Farm. Also drafted into the ATUA and yet originally part of Ash Green, is the Old Farmhouse just down Drovers way. This was originally called Ash Green Farm. When looking at it all with historically 2 farms and farms are generally part of the countryside, this shows we are rural and must stay that way.

So as part of the countryside policy I would like to ask for the following amendments to 4.3.29, 4.3.30 and policy P3 as follows to keep Ash Green as a rural area and to not be dissolved into urbanisation.

- **4.3.29 Amend:** “Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second largest urban area. Given its relative sustainability, **Countryside** to the south and east of the urban area within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development.”

- **4.3.30 Amend:** “We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green.”

- **Policy P3 Amend:** (1) (c) to read “does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Attached documents:
• Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road

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Policy P3 Amend to: (1) (c) should be amended to read “does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.”

Attached documents:

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Comment ID: PSLPP16/6631  Respondent: 10829121 / Julie Brown  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to POLICY P3 – Countryside (i.e. beyond the Green Belt)

• Gives Ash and Tongham more protection than rest of borough, including existing Green Belt. But they don’t contribute to preventing London sprawl.
• Special treatment of ward represented by current Council Leader and his predecessor. Politically biased.
• A minor extension of Green Belt in one place does not justify its major destruction elsewhere (the inset villages).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/3203  Respondent: 10831745 / Diane Wilsden  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy P3 - Countryside

• Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road
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• Policy P3 Amend: (1) (c) should be amended to read "does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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Policy P3 Amend: (1) (c) should be amended to read "does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.

Attached documents:

Comment ID: pslp171/3209  Respondent: 10831841 / S Wilsden  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Policy P3 Amend: (1) (c) should be amended to read "does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.

Attached documents:

Comment ID: PSLPP16/3470  Respondent: 10843361 / Natalie Brown  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3
I object to POLICY P3 – Countryside (i.e. beyond the Green Belt)

- Gives Ash and Tongham more protection than rest of borough, including existing Green Belt. But they don’t contribute to preventing London sprawl.
- Special treatment of ward represented by current Council Leader and his predecessor. Politically biased.
- A minor extension of Green Belt in one place does not justify its major destruction elsewhere (the inset villages).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to this policy as it stands.

There is an emphasis on provision both of services and of additional Green Belt in Ash and Tongham. It is not clear why new Green Belt should be designated here, while the Green Belt is being rolled back in all other areas of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18593  Respondent: 10858977 / Angela Otterson  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to policy P3 Countryside (i.e. beyond the Green Belt)

This is more protective – as a policy – than the proposals for the AONB and the Green Belt, so is anomalous and wrong. I am not in favour of building on this area, since urban, brownfield areas are sufficient to meet all reasonable housing targets. There is no need to build on any green fields if brownfield, previously developed land is used efficiently (without garden-grabbing).

This policy refers to the countryside near Ash and Tongham (see paragraph 4.3.28). This area does not justify stronger policy protection than any other part of the borough. The fact that the current and previous Council Leaders represent it should not give it preferential status: “we will seek to limit any development in the countryside unless it can be demonstrated that it is necessary in that location”. Green Belt and AONB areas should by definition have higher levels of protection than non-Green Belt areas.

It should also be noted that Ash and Tongham lie beyond Guildford far away from London and therefore make no contribution to controlling Metropolitan urban sprawl, unlike those villages which, ironically, are to be “inset”. That is presumably why Ash and Tongham are not in the Green Belt already. This policy, however, attaches higher priority to preventing the “coalescence between the Ash and Tongham urban area and Aldershot” than it does to the primary purpose of the Metropolitan Green Belt, which is to stop London sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16014  Respondent: 10859553 / MARK Curtis  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY P3 COUNTRYSIDE

I object to policy P3 Countryside (i.e. beyond the Green Belt)

This is more protective – as a policy – than the proposals for the AONB and the Green Belt, so is anomalous. I am not in favour of building on this area, since urban, brownfield areas are sufficient to meet all reasonable housing targets. There is no need to build on any green fields if brownfield, previously developed land is used efficiently (without garden-grabbing).
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It should also be noted that Ash and Tongham lie beyond Guildford far away from London and therefore make no contribution to controlling Metropolitan urban sprawl, that is presumably why Ash and Tongham are not in the Green Belt already. This policy, however, attaches higher priority to preventing the “coalescence between the Ash and Tongham urban area and Aldershot” than it does to the primary purpose of the Metropolitan Green Belt, which is to stop London sprawl. I agree to the prevention of coalescence but this should apply to all villages including East and West Horsley and Flexford and Normandy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16425  Respondent: 10876033 / Lucie Paulson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to policy P3
- apparent special treatment of Council Leader’s ward. Looks suspiciously like NIMBYism at the highest level.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/3339  Respondent: 10901697 / JM Long  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy P3 - Countryside

- Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road
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- Policy P3 Amend: (1) (c) should be amended to read "does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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Policy P3 Amend: (1) (c) should be amended to read "does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.

**Attached documents:**

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<th>Comment ID: PSLPP16/18123</th>
<th>Respondent: 10910273 / Lynda M Williams</th>
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<td><strong>We have no objections to this policy.</strong></td>
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<th>Respondent: 10915361 / Judy Young</th>
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<td><strong>POLICY P3 – Countryside</strong></td>
<td><strong>I OBJECT to this policy which gives an elevated protection to an area, more than the protection afforded to the Green Belt or Area of Outstanding Natural Beauty</strong></td>
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<td><strong>– Countryside (i.e. countryside beyond the Green Belt) OBJECT. Why should more homes be built in the countryside when there are adequate brownfield areas within the urban area already identified? These should be developed first to meet the housing need</strong></td>
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</table>
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**Comment ID:** PSLPP16/11316  **Respondent:** 10923297 / Matthew Burnham  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I OBJECT TO POLICY P3 (COUNTRYSIDE BEYOND THE GREEN BELT):

- Gives Ash and Tongham more protection than rest of borough, including existing Green Belt. But they don't contribute to preventing London sprawl.
- Special treatment of ward represented by current Council Leader and his predecessor. Politically biased.
- A minor extension of Green Belt in one place does not justify its major destruction elsewhere (the inset villages).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp171/3223  **Respondent:** 10932385 / Lynne Bryant  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P3

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

Policy P3 - Countryside

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Attached documents:

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Comment ID: PSLPP16/1707  Respondent: 10933793 / Julia Tilbury  Agent: 

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**POLICY P3- Countryside (i.e. beyond the Green Belt)**

I OBJECT . This is more protective- as a policy- than the proposals for the AONB and the Green Belt, so is anomalous and wrong. I am not in favour of building on this area, since urban, brownfield areas are sufficient to meet all reasonable housing targets . There is no need to build on any green fields if brownfield, previously developed land is used efficiently (without garden-grabbing).

This policy refers to the countryside near Ash and Tongham (see paragraph 4.3 .28) . This area does not justify stronger policy protection than any other part of the borough. The fact that the current and previous Council Leaders represent it should not give it preferential status: “we will seek to limit any development in the countryside unless it can be demonstrated that it is necessary in that location”. Green Belt and AONB areas should by definition have higher levels of protection than non-Green Belt areas.

It should also be noted that Ash and Tongham lie beyond Guildford far away from London and therefore make no contribution to controlling Metropolitan urban sprawl, unlike those villages which, ironically, are to be "inset". That is presumably why Ash and Tongham are not in the Green Belt already. This policy, however, attaches higher priority to preventing the "coalescence between the Ash and Tongham urban area and Aldershot" than it does to the primary purpose of the Metropolitan Green Belt, which is to stop London sprawl.

Apart from being a scandalous misuse of local political patronage, this policy effectively says, "Look, we are not destroying the Guildford Green Belt because we are extending it in Ash and Tongham.” It is a cynical piece of tokenism. The leader of the Council needs to be seen to be above reproach by deleting this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1679  Respondent: 10933857 / C J Tilbury  Agent: 

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**POLICY P3- Countryside (i.e. beyond the Green Belt)**

I OBJECT . This is more protective- as a policy- than the proposals for the AONB and the Green Belt, so is anomalous and wrong. I am not in favour of building on this area, since urban, brownfield areas are sufficient to meet all reasonable housing targets . There is no need to build on any green fields if brownfield, previously developed land is used efficiently (without garden-grabbing).
This policy refers to the countryside near Ash and Tongham (see paragraph 4.3.28). This area does not justify stronger policy protection than any other part of the borough. The fact that the current and previous Council Leaders represent it should not give it preferential status: “we will seek to limit any development in the countryside unless it can be demonstrated that it is necessary in that location”. Green Belt and AONB areas should by definition have higher levels of protection than non-Green Belt areas.

It should also be noted that Ash and Tongham lie beyond Guildford far away from London and therefore make no contribution to controlling Metropolitan urban sprawl, unlike those villages which, ironically, are to be “inset”. That is presumably why Ash and Tongham are not in the Green Belt already. This policy, however, attaches higher priority to preventing the “coalescence between the Ash and Tongham urban area and Aldershot” than it does to the primary purpose of the Metropolitan Green Belt, which is to stop London sprawl.

Apart from being a scandalous misuse of local political patronage, this policy effectively says, "Look, we are not destroying the Guildford Green Belt because we are extending it in Ash and Tongham.” It is a cynical piece of tokenism. The leader of the Council needs to be seen to be above reproach by deleting this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/15364  **Respondent:** 10935201 / Cathryn Walton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I OBJECT. This is more protective – as a policy – than the proposals for the AONB and the Green Belt, so is anomalous and wrong. I am not in favour of building on this area, since urban, brownfield areas are sufficient to meet all reasonable housing targets. There is no need to build on any green fields if brownfield, previously developed land is used efficiently (without garden-grabbing).

This policy refers to the countryside near Ash and Tongham (see paragraph 4.3.28). This area does not justify stronger policy protection than any other part of the borough. The fact that the current and previous Council Leaders represent it should not give it preferential status: “we will seek to limit any development in the countryside unless it can be demonstrated that it is necessary in that location”. Green Belt and AONB areas should by definition have higher levels of protection than non-Green Belt areas.

It should also be noted that Ash and Tongham lie beyond Guildford far away from London and therefore make no contribution to controlling Metropolitan urban sprawl, unlike those villages which, ironically, are to be “inset”. That is presumably why they are not in the Green Belt already. This policy, however, attaches higher priority to preventing the “coalescence between the Ash and Tongham urban area and Aldershot” than it does to the primary purpose of the Metropolitan Green Belt.

Apart from being a scandalous case of local political patronage, this policy effectively says, “Look, we are not destroying the Guildford Green Belt because we are extending it in Ash and Tongham.” It is a cynical piece of tokenism.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp171/1938  **Respondent:** 10984321 / Paul Povey  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. **Policy P3 - Countryside**

Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road

- **4.3.29 Amend to:** “Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development.”

- **4.3.30 Amend to:** “We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green.”

- **Policy P3 Amend to:** (1) (c) should be amended to read “does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

4.3.29 Amend to: “Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development.”

4.3.30 Amend to: “We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green.”

Policy P3 Amend to: (1) (c) should be amended to read “does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.”

Attached documents:

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Comment ID: PSLPP16/9198  **Respondent:** 10985057 / Anthony Parker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Countryside (i.e. countryside beyond the Green Belt) – I OBJECT. This seems more protective – as a policy – than the proposals for the AONB and the Green Belt, which is anomalous. I am not in favour of building on this area – the brownfield areas within the urban area are sufficient to meet all reasonable housing targets. There should be no need to build on any green fields if brownfield (previously developed) land is used efficiently. (That does not mean garden-grabbing!).

However, I do not think this area justifies stronger policy protection than any other part of the borough. This policy refers to the area of countryside near Ash and Tongham (see paragraph 4.3.28). The fact that the current and previous Council Leaders represent this area should not give it preferential status:

“we will seek to limit any development in the countryside unless it can be demonstrated that it is necessary in that location”. Green Belt and AONB areas should – by definition - have higher levels of protection than non-Green Belt areas, which is not the case with this policy.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/2449  **Respondent:** 11014881 / Linda Peters-Smith  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

Policy P3 - Countryside (Beyond the Green Belt)

I object. There is no need to build on greenfield sites if brownfield sites are used efficiently.

Why not build in Ash and Tongham rather than extend the Green Belt here?

Surely the existing Green Belt and Area of Outstanding Natural Beauty should be more protected than these new areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp171/2207  **Respondent:** 11031809 / Jackie Scott  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P3

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

- Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road

- **4.3.29 Amend to:** “Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development.”

- **4.3.30 Amend to:** “We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green.”

- **Policy P3 Amend to:** (1) (c) should be amended to read “does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

4.3.29 Amend to: “Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development.”

4.3.30 Amend to: “We do however wish to ensure that whilst accommodating this growth, we are able to protect the
remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green.”

Policy P3 Amend to: (1) (c) should be amended to read “does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.”

I object - How can it be sensible to protect areas further from London i.e. Ash and Tongham (the direction from which urban sprawl comes) over the villages closer to the M25 with commuting access to London. This is clearly politically biased (I understand a number of senior council members past and present live in Ash and Tongham) and focused on maximizing profits for housing developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to policy P3 Countryside (i.e. beyond the Green Belt) This is more protective – as a policy – than the proposals for the AONB and the Green Belt, so is anomalous. I am not in favour of building on this area, since urban, brownfield areas are sufficient to meet all reasonable housing targets. There is no need to build on any green fields if brownfield, previously developed land is used efficiently (without garden-grabbing). This policy refers to the countryside near Ash and Tongham (see paragraph 4.3.28). This area does not justify stronger policy protection than any other part of the borough. The fact that the current and previous Council Leaders represent it should not give it preferential status: “we will seek to limit any development in the countryside unless it can be demonstrated that it is necessary in that location”. Green Belt and AONB areas should by definition have higher levels of protection than non-Green Belt areas. It should also be noted that Ash and Tongham lie beyond Guildford far away from London and therefore make no contribution to controlling Metropolitan urban sprawl, that is presumably why Ash and Tongham are not in the Green Belt already. This policy, however, attaches higher priority to preventing the “coalescence between the Ash and Tongham urban area and Aldershot” than it does to the primary purpose of the Metropolitan Green Belt, which is to stop London sprawl. I agree to the prevention of coalescence but this should apply to all villages including East and West Horsley and Flexford and Normandy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to POLICY P3 (Countryside beyond the Green Belt)

This policy wrong as it results in giving more protection as a policy than the proposals for AONB and the Green Belt. I object to the idea of building on any green fields as there is sufficient brownfield (previously developed land) and urban areas to meet all reasonable housing need, e.g. River Wey/Walnut Tree Close area.

This policy (see para. 4.3.28) refers to protecting countryside near Ash and Tongham. This area does not justify stronger policy protection than the rest of the borough including Green Belt. It should not be afforded special treatment. The area concerned does not contribute to the prevention of Metropolitan urban sprawl, lying further away from London beyond Guildford, whereas those villages to be ‘inset’ do contribute to preventing urban sprawl.

Green Belt and AONB areas should as a matter of policy be classed as having higher levels of protection than non-Green Belt areas.

This policy does not make sense as it is proposing a minor extension of the Green Belt in one place (Ash and Tongham) whilst trying to justify its major destruction in other places (the inset villages) which are currently in Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Having read the plan and the fact that there is a clear bias for urban development in Ash, I cannot see the logic of creating a small Green Belt to protect Ash Vale.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9603  Respondent: 11053889 / Claire Handley  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I also wish to OBJECT TO POLICY P3 (COUNTRYSIDE BEYOND THE GREEN BELT) and was very disappointed to note that the proposed draft Plan gives Ash and Tongham more protection than the rest of borough, including existing Green Belt, although these villages do not contribute to preventing London sprawl – unlike East and West Horsley, Ockham etc. Without wishing to be cynical, I would question whether due process has been followed in developing the draft Plan where there appears to be special treatment of a ward represented by the current Council Leader and his predecessor. With questions around political bias, the draft Plan should not be approved as it is currently drawn.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8828  Respondent: 11071553 / Nicholas Roberts  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY P3 (COUNTRYSIDE BEYOND THE GREEN BELT) – I object because the only area to benefit (Ash & Tongham) is represented by the council leader and his predecessor. This is a distasteful hangover from the Mansbridge/Juneja plan. The current leader opens himself up to accusations of political bias by pushing for greater protection for this area than for villages that have been in the Green Belt for generations. It’s transparently cynical to extend the Green Belt in the extreme south-west while destroying it in the north and east where it protects the borough against the London sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14317  Respondent: 11080097 / David & Julia Hunt  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to policy P3 Countryside (i.e. beyond the Green Belt) This is more protective – as a policy – than the proposals for the AONB and the Green Belt, so is anomalous. I am not in favour of building on this area, since urban, brownfield
areas are sufficient to meet all reasonable housing targets. There is no need to build on any green fields if brownfield, previously developed land is used efficiently (without garden-grabbing). This policy refers to the countryside near Ash and Tongham (see paragraph 4.3.28). This area does not justify stronger policy protection than any other part of the borough. The fact that the current and previous Council Leaders represent it should not give it preferential status: “we will seek to limit any development in the countryside unless it can be demonstrated that it is necessary in that location”.

Green Belt and AONB areas should by definition have higher levels of protection than non-Green Belt areas. It should also be noted that Ash and Tongham lie beyond Guildford far away from London and therefore make no contribution to controlling Metropolitan urban sprawl, that is presumably why Ash and Tongham are not in the Green Belt already. This policy, however, attaches higher priority to preventing the “coalescence between the Ash and Tongham urban area and Aldershot” than it does to the primary purpose of the Metropolitan Green Belt, which is to stop London sprawl. I agree to the prevention of coalescence but this should apply to all villages including East and West Horsley and Flexford and Normandy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/2269  Respondent: 11097953 / Stephen Bowers  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. **Policy P3 - Countryside**

   - Ash Green is not part of the Ash & Tongham Urban Area. The urban boundary of the ATUA is shown extending south of Foreman Road and east of Ash Green Road. This should not be allowed.

   - **3.29 Amend to:** “Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure improvements must be implemented before further development.”

   - **3.30 Amend to:** “We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate and excessive over-development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green.”

   - **Policy P3 Amend to:** (1) (c) should be amended to read “does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4753  Respondent: 15084897 / Save Send Action Group (Andrew Procter)  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

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14 POLICY P3 COUNTRYSIDE

14.1 I object to policy P3 Countryside (i.e. beyond the Green Belt)

14.2 This is more protective – as a policy – than the proposals for the AONB and the Green Belt, so is anomalous and wrong. I am not in favour of building on this area, since urban, brownfield areas are sufficient to meet all reasonable housing targets. There is no need to build on any green fields if brownfield, previously developed land is used efficiently (without garden-grabbing).

14.3 This policy refers to the countryside near Ash and Tongham (see paragraph 4.3.28). This area does not justify stronger policy protection than any other part of the borough. The fact that the current and previous Council Leaders represent it should not give it preferential status: “we will seek to limit any development in the countryside unless it can be demonstrated that it is necessary in that location”. Green Belt and AONB areas should by definition have higher levels of protection than non-Green Belt areas.

14.4 It should also be noted that Ash and Tongham lie beyond Guildford far away from London and therefore make no contribution to controlling Metropolitan urban sprawl, unlike those villages which, ironically, are to be “inset”. That is presumably why Ash and Tongham are not in the Green Belt already. This policy, however, attaches higher priority to preventing the “coalescence between the Ash and Tongham urban area and Aldershot” than it does to the primary purpose of the Metropolitan Green Belt, which is to stop London sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
13) the use of countryside areas for which the area is so well know to build more properties

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13738  Respondent: 15227905 / Nigel Alexander  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY P3 (COUNTRYSIDE BEYOND THE GREEN BELT):
• Gives Ash and Tongham more protection than rest of borough, including existing Green Belt. But they don’t contribute to preventing London sprawl.
• Special treatment of ward represented by current Council Leader and his predecessor. Politically biased.
• A minor extension of Green Belt in one place does not justify its major destruction elsewhere (the inset villages).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1735  Respondent: 15244641 / Wesley Raynbird-Tilbury  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY P3- Countryside (i.e. beyond the Green Belt)

I OBJECT. This is more protective - as a policy- than the proposals for the AONB and the Green Belt, so is anomalous and wrong. I am not in favour of building on this area, since urban, brownfield areas are sufficient to meet all reasonable housing targets. There is no need to build on any green fields if brownfield, previously developed land is used efficiently (without garden-grabbing).

This policy refers to the countryside near Ash and Tongham (see paragraph 4.3 .28) . This area does not justify stronger policy protection than any other part of the borough. The fact that the current and previous Council Leaders represent it should not give it preferential status: "we will seek to limit any development in the countryside unless it can be demonstrated that it is necessary in that location". Green Belt and AONB areas should by definition have higher levels of protection than non-Green Belt areas.

It should also be noted that Ash and Tongham lie beyond Guildford far away from London and therefore make no contribution to controlling Metropolitan urban sprawl, unlike those villages which, ironically, are to be "inset". That is presumably why Ash and Tongham are not in the Green Belt already. This policy, however, attaches higher priority to preventing the "coalescence between the Ash and Tongham urban area and Aldershot" than it does to the primary purpose of the Metropolitan Green Belt, which is to stop London sprawl.

Apart from being a scandalous misuse of local political patronage, this policy effectively says, "Look, we are not destroying the Guildford Green Belt because we are extending it in Ash and Tongham." It is a cynical piece of tokenism. The leader of the Council needs to be seen to be above reproach by deleting this policy.
Beyond the Green Belt there are areas of countryside around the villages of Ash, Ash Vale and Tongham to the west of the Borough. Whilst the Spatial strategy identifies certain areas of countryside around these settlements for development Policy P3 seeks to protect the gaps between Ash, Tongham and Aldershot.

It is considered therefore that other than the land currently allocated to the west of the borough no further sustainable development opportunities can be brought forward.
I OBJECT TO POLICY P3 (COUNTRYSIDE BEYOND THE GREEN BELT):

- Gives Ash and Tongham more protection than rest of borough, including existing Green Belt. But they don’t contribute to preventing London sprawl.
- Special treatment of ward represented by current Council Leader and his predecessor. Politically biased.
- A minor extension of Green Belt in one place does not justify its major destruction elsewhere (the inset villages).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to policy P3 Countryside (i.e. beyond the Green Belt) This is more protective – as a policy – than the proposals for the AONB and the Green Belt, so is anomalous. I am not in favour of building on this area, since urban, brownfield areas are sufficient to meet all reasonable housing targets. There is no need to build on any green fields if brownfield, previously developed land is used efficiently (without garden-grabbing). This policy refers to the countryside near Ash and Tongham (see paragraph 4.3.28). This area does not justify stronger policy protection than any other part of the borough. The fact that the current and previous Council Leaders represent it should not give it preferential status: “we will seek to limit any development in the countryside unless it can be demonstrated that it is necessary in that location”. Green Belt and AONB areas should by definition have higher levels of protection than non-Green Belt areas. It should also be noted that Ash and Tongham lie beyond Guildford far away from London and therefore make no contribution to controlling Metropolitan urban sprawl, that is presumably why Ash and Tongham are not in the Green Belt already. This policy, however, attaches higher priority to preventing the “coalescence between the Ash and Tongham urban area and Aldershot” than it does to the primary purpose of the Metropolitan Green Belt, which is to stop London sprawl. I agree to the prevention of coalescence but this should apply to all villages including East and West Horsley and Flexford and Normandy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

3). I object to the congestion that the development will cause to the local village roads and the lack of road structure improvement (Policy P3).

The roads around Clandon, Send and Ripley are already congested with frequent long lines of traffic queuing. Narrow roads such as Newark Lane and Rose Lane already struggle with the present amount of traffic. Crossing the road as a
pedestrian in these villages can be dangerous. Walking from Grove Heath North to the High Street in Ripley requires
crossing Rose Lane often between cars waiting in this road turning left or right into the High Street. This crossing of Rose
Lane is not pedestrian friendly and one day someone will get hurt or killed. Any further increase in traffic will only make
matters worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3438  Respondent: 15320737 / Steven Brown  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to POLICY P3 – Countryside (i.e. beyond the Green Belt)

• Gives Ash and Tongham more protection than rest of borough, including existing Green Belt. But they don’t contribute to preventing London sprawl.
• Special treatment of ward represented by current Council Leader and his predecessor. Politically biased.
• A minor extension of Green Belt in one place does not justify its major destruction elsewhere (the inset villages).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3147  Respondent: 15323041 / Jane Doherty  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I have no objections to this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4080  Respondent: 15353633 / Neal Stone  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

4. I OBJECT to Policy P3: a minor extension of Metropolitan Green Belt here in Ash and Tongham seems not justify the greater changes proposed in P2 et al for insetting villages. Also, why is this ward (represented by the current Council Leader) given special treatment and called out specifically for protection?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
POLICY P3 – Countryside (ie countryside beyond the Green Belt)

GROUND FOR OBJECTION. This seems *more* protective – as a policy – than the proposals for the AONB and the Green Belt which is anomalous. Note - we are *not* in favour of building on this area. We think that the brownfield areas within the urban area are sufficient to meet all reasonable housing targets. There should be no need to build on any green fields if brownfield (previously developed) land is used efficiently. (That does not mean garden-grabbing!).

However, we do not think this area justifies *stronger* policy protection than any other part of the borough. This policy refers to the area of countryside near Ash and Tongham (see paragraph 4.3.28). The fact that the current and previous Council Leaders represent this area should not give it preferential status: "we will seek to limit any development in the countryside unless it can be demonstrated that it is necessary in that location". Green Belt and AONB areas should – by definition - have higher levels of protection than non-Green Belt areas, which is not the case with this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Brownfield sites in the Guildford urban area, if used properly, would be sufficient to meet all building targets. I object to all building on green belt or green field sites, because if this is allowed to commence, the unborn sprawl will reach from Guildford straight through to Aldershot and Farnham.

Normandy and Flexford needs and priorities do not include a secondary school. I object to this proposal as there are already two such schools to the west of Guildford with some hundreds of empty places.

The local so-called plan will permanently destroy Normandy and Flexford rural status. It will bring chaos to traffic movements air pollution will increase and will turn a very pleasant village into urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6781  Respondent: 15438945 / Jacqueline Davies  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to POLICY P3 – Countryside (i.e. beyond the Green Belt)

• Gives Ash and Tongham more protection than rest of borough, including existing Green Belt. But they don’t contribute to preventing London sprawl.
• Special treatment of ward represented by current Council Leader and his predecessor. Politically biased.
• A minor extension of Green Belt in one place does not justify its major destruction elsewhere (the inset villages).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14362  Respondent: 15446401 / Louise Yandle  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY P3 (COUNTRYSIDE BEYOND THE GREEN BELT):

• Gives Ash and Tongham more protection than rest of borough, including existing Green Belt. But they don’t contribute to preventing London sprawl.
• Special treatment of ward represented by current Council Leader and his predecessor. Politically biased.
• A minor extension of Green Belt in one place does not justify its major destruction elsewhere (the inset villages).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to POLICY P3 – Countryside (i.e. beyond the Green Belt)

- Gives Ash and Tongham more protection than rest of borough, including existing Green Belt. But they don’t contribute to preventing London sprawl.
- Special treatment of ward represented by current Council Leader and his predecessor. Politically biased.
- A minor extension of Green Belt in one place does not justify its major destruction elsewhere (the inset villages).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT TO POLICY P3 (COUNTRYSIDE BEYOND THE GREEN BELT):
• Gives Ash and Tongham more protection than rest of borough, including existing Green Belt. But they don’t contribute to preventing London sprawl.
• Special treatment of ward represented by current Council Leader and his predecessor. Politically biased.
• A minor extension of Green Belt in one place does not justify its major destruction elsewhere (the inset villages).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10034  Respondent:  15495873 / Gerard Duvé  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Countryside

I believe brownfield sites in all areas, including AONB, should be utilised and all areas should provide some affordable and Rural Exception Homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11077  Respondent:  15509057 / Richard Golding  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT. This is more protective – as a policy – than the proposals for the AONB and the Green Belt, so is anomalous and wrong. I am not in favour of building on this area, since urban, brownfield areas are sufficient to meet all reasonable housing targets some owned by Guildford borough and Surrey County Council. There is no need to build on any green fields if brownfield, previously developed land is used efficiently (without garden-grabbing). This policy refers to the countryside near Ash and Tongham (see paragraph 4.3.28). This area does not justify stronger policy protection than any other part of the borough. The fact that the current and previous Council Leaders represent it should not give it preferential status: “we will seek to limit any development in the countryside unless it can be demonstrated that it is necessary in that location”. Green Belt and AONB areas should by definition have higher levels of protection than non-Green Belt areas. It should also be noted that Ash and Tongham lie beyond Guildford far away from London and therefore make no contribution to controlling Metropolitan urban sprawl, unlike those villages, which, ironically, are to be “inset”. That is presumably why Ash and Tongham are not in the Green Belt already. This policy, however, attaches higher priority to preventing the “coalescence between the Ash and Tongham urban area and Aldershot” than it does to the primary purpose of the Metropolitan Green Belt, which is to stop London sprawl. Sprawl from towns that occurred between the two wars was one of the main reason for establishing the Green Belt. Apart from being a scandalous misuse of local political patronage, this policy effectively says, “Look, we are not destroying the Guildford Green Belt because we are extending it in Ash and Tongham.” It is a cynical piece of tokenism. The leader of the Council needs to be seen to be above reproach by deleting this policy.

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<tr>
<th>Comment ID: PSLPP16/11246</th>
<th>Respondent: 15570145 / Owen Eszeki</th>
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POLICY P3 – Countryside (i.e. beyond the Green Belt) - I OBJECT.

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Urban, brownfield areas are sufficient to meet all reasonable housing targets. There is no need to build on any green fields if brownfield, previously developed land is used efficiently.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17390  Respondent: 15682465 / Nick Beesly  Agent: 1856
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Protecting Policies: The Protecting Policies P1 “AONB”, P2 “Green Belt” and P3 “Countryside” are supported.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17600  Respondent: 15688481 / Sally Lescher  Agent: 1856
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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This is more protective – as a policy – than the proposals for the AONB and the Green Belt, so is anomalous. I am not in favour of building on this area, since urban, brownfield areas are sufficient to meet all reasonable housing targets. There is no need to build on any green fields if brownfield, previously developed land is used efficiently (without garden-grabbing).

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It should also be noted that Ash and Tongham lie beyond Guildford far away from London and therefore make no contribution to controlling Metropolitan urban sprawl, that is presumably why Ash and Tongham are not in the Green Belt already. This policy, however, attaches higher priority to preventing the “coalescence between the Ash and Tongham urban area and Aldershot” than it does to the primary purpose of the Metropolitan Green Belt, which is to stop London sprawl. I agree to the prevention of coalescence but this should apply to all villages including East and West Horsley and Flexford and Normandy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/17610  Respondent: 15689793 / Gladman Developments (Mat Evans)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Whilst the concept of what the policy is trying to achieve is acknowledged, Gladman have concern that the policy could be used to refuse development, when the development in question represented sustainable development. We would suggest that the policy should be rewritten to incorporate a reference as to how the policy will be used as part of a wider judgement on the sustainability of a site.

Given the nature of the district it is entirely possible that none green belt land may come under more pressure than other areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15572  Respondent: 15977889 / Charles Kimpton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

OBJECT. We believe brownfield areas are sufficient to meet all housing requirements

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3217  Respondent: 17253473 / Ronald Large  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy P3 - Countryside

• Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road
• 4.3.29 Amend: "Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough's second largest urban area. Given its relative sustainability, the Countryside to the south and east of the urban area, within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development."
• 4.3.30 Amend: "We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green."
• Policy P3 Amend: (1) (c) should be amended to read "does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.

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Attached documents:

Comment ID: pslp171/418  Respondent: 17269697 / Arthur Horner  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P3

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Attached documents:

Comment ID: pslp171/380  Respondent: 17270017 / John Mansfield  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P3
Policy P3 - Countryside

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Attached documents:

Comment ID: pslp171/379  Respondent: 17275809 / J. Mansfield  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Attached documents:

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Comment ID: pslp171/419  Respondent: 17279329 / Pamela Horner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P3

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Attached documents:

Comment ID: pslp171/606  Respondent: 17293633 / Raymond Rogers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Do you consider this section of the document; complies with the Duty to Cooperate? (Yes), is Sound? (No), is Legally Compliant? (Yes)

• Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road
• 4.3.29 Amend to: “Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development.”
• 4.3.30 Amend to: “We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green.”
• Policy P3 Amend to: (1) (c) should be amended to read “does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

4.3.29 Amend to: “Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development.”

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Policy P3 Amend to: (1) (c) should be amended to read “does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.”

Attached documents:

Comment ID: pslp171/1956  Respondent: 17339649 / Karen Heane  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy P3 - Countryside

- Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road
- 4.3.29 Amend: “Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough's second largest urban area. Given its relative sustainability, the Countryside to the south and east of the urban area within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development.”
4.3.30 Amend: "We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green."

Policy P3 Amend: (1) (c) should be amended to read "does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

4.3.29 Amend: "Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development."

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Policy P3 Amend: (1) (c) should be amended to read "does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.

Attached documents:

Comment ID: pslp171/1158  Respondent: 17341217 / HECS (Howard Watson)  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

I am a resident of Ash Green Village which seems to be encompassed by these plans but is not mentioned by name. Ash Green village is a separate entity bounded by Ash Green road to the north and has been since the early 19th century. This village is not part of the Ash and Tongham Urban Area and the unbuilt on buffer area must remain between Ash Green Village and the Ash and Tongham Urban Area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

The buffer of Ash Manor should be maintained as it not only forms a natural buffer but is of historic significance.

Attached documents:

Comment ID: pslp171/3280  Respondent: 17344385 / Alan Broadley  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

[Text of attachment reproduced below]

- Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road

- 3.29 Amend to: “Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second largest
urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development.”

• 3.30 Amend to: “We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green.”

• Policy P3 Amend to: (1) (c) should be amended to read “does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Respondent: 17366721 / Marilyn Backhurst</th>
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| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
|---------------------------|------------------------------------------|--------|
| 1. Policy P3 - Countryside |
| • Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road |
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Policy P3 Amend to: (1) (c) should be amended to read “does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.”

Attached documents:

| Comment ID: pslp171/1403 | Respondent: 17382401 / Mark Chandler | Agent: |

Section page number 81 of 97
Document page number 1865
I have lived in Ash Green all my life. I live in Ash Green Road and it is part of Ash Green. This area is rural. I live opposite the fields to Ash Manor and the road I live on is rural. In the late summer our road is busy with tractors and agricultural vehicles from the nearby farm harvesting their crop.

This part of Ash Green I live in is not part of the Ash and Tongham Urban Area (ATUA) and so the boundary should not extend south of Ash Green Road and Foreman Road.

For this reason could section 4.3.29 be amended to...

"Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham Urban area has grown considerably in size and now forms Guildford Borough's second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development".

Please amend section 4.3.30 to.....

'We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green."

Please amend Policy P3 to read...

"does not lead to greater physical or visual coalescence between the Ash and Tongham urban area. Ash Green and Aldershot."

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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"Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham Urban area has grown considerably in size and now forms Guildford Borough's second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development".

Please amend section 4.3.30 to.....

'We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green."

Please amend Policy P3 to read...

"does not lead to greater physical or visual coalescence between the Ash and Tongham urban area. Ash Green and Aldershot."

Attached documents:
I can see in your Policy P3 that it is about the countryside. I would like object to the current wording and see amendments that gives Ash Green more protection from inappropriate and over development, protect Ash Green as a rural community and not join us in to the Ash and Tongham Urban Area (ATUA). It also needs to preserve it's role in maintaining a separation of identity to Ash and Tongham. I would also like to see Ash Manor as a buffer between the rural Ash Green and Urban Ash.

To add to the amendments in this policy there should be rewording that ensures there is sufficient infrastructure before any development goes ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
make this growth sustainable, suitable infrastructure must be implemented before further development.”

4.3.30 Amend: "We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green.”

Policy P3 Amend: (1) (c) should be amended to read "does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.

Attached documents:

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**Comment ID:** pslp171/1732  **Respondent:** 17415809 / Susan Wheeler  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy P3, ash green is not part of the Ash and Tongham urban area and therefore the ATUA boundary must not extend south of ash green road and foreman road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp171/1746  **Respondent:** 17416545 / Paul Finning  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Ash Green is not part of the Ash and Tongham Urban area and I strongly disagree that it should be made so. I live in Ash Manor, which has a long history, and has always been part of Ash Green so please do not do anything to move Ash Green, as the current proposal appears to do, or coalesce Ash, Tongham and Ash Green. The green boundary's should stay in place to allow the villages to be separate. The intrinsic character of Ash Green should be be kept intact after any development.

Substantial development has been proposed for Ash Green and I believe it is vital suitable infrastructure to be in place before further development commences. The road infrastructure required includes work to the A31/A3 junction at Guildford, A331/A31 junction and improvements around Ash station as without these Ash Green, which is used as a rat run already, will be even more overrun and dangerous than it is already with small roads under large pressure. In addition infrastructure for schools, doctors, shops, etc is also sorely lacking with the planning approvals we already have let alone those proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp171/1796  **Respondent:** 17422753 / Carol Middleton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Ash Green is not part of the Ash and Tongham Urban area and I strongly disagree that it should be made so. I live in Ash Manor, which has a long history, and has always been part of Ash Green so please do not do anything to move Ash Green, as the current proposal appears to do, or coalesce Ash, Tongham and Ash Green. The green boundary's should stay in place to allow the villages to be separate. The intrinsic character of Ash Green should be be kept intact after any development.

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Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

4.3.29 Amend: Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough's second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development.

4.3.30 Amend: "We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green."

Policy P3 Amend: (1) (c) should be amended to read "does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot."

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Policy P3 Amend: (1) (c) should be amended to read "does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot."

Attached documents:

Comment ID: pslp171/1820  Respondent: 17423617 / David Middleton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

- **4.3.29 Amend:** "Originally consisting of the three small rural villages of Ash, Ash Vale, and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough's second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development."

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4.3.30 Amend: "We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green."

Policy P3 Amend: (1) (c) should be amended to read "does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot."

Attached documents:

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**Comment ID:** pslp171/1894  **Respondent:** 17425377 / Hannah Finning  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P3

**Do you consider this section of the document; complies with the Duty to Cooperate?**  ( ),  **is Sound?**  ( ),  **is Legally Compliant?**  ( )

**Policy P3 Countryside:**

Ash Green should not be part of the Ash and Tongham Urban area and should not be made so. The green boundary's should stay in place to allow the villages Ash, Tongham, and Ash Green to remain separate. I live in Ash Manor and historically it has always been part of Ash Green so please do not do anything to move Ash Green, as the current proposal appears to do, or coalesce Ash, Tongham and Ash Green. The intrinsic character of Ash Green should be be kept intact after any development.

Substantial development has been proposed for Ash Green and I believe it is vital that suitable infrastructure is in place before any further development commences. Ash Green Road/Wyke Lane are already used as rat runs when there are problems on the A3/A31 Hogs back and Ash station. These are narrow lanes that cannot take the additional traffic when this happens. The road infrastructure required includes work to the A31/A3 junction at Guildford, A331/A31 junction and improvements around Ash station to alleviate the damage to these lanes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp171/1971  **Respondent:** 17433729 / Ian Price  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P3

**Do you consider this section of the document; complies with the Duty to Cooperate?**  ( ),  **is Sound?**  ( ),  **is Legally Compliant?**  ( )

- Ash Green is not part of the Ash & Tongham Urban Area. It was always a separate entity as can be seen on any OS map, and your own council documents. Therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road

- **4.3.29 Amend to:** “Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second..."
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• 4.3.30 Amend to: “We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green.”

• Policy P3 Amend to: (1) (c) should be amended to read “does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.”

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Policy P3 Amend to: (1) (c) should be amended to read “does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.”

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<th>17433985 / Stephen Pedley</th>
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Policy P3 – Countryside. Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road. Countryside within the urban area may be allocated as a strategic location for development, however suitable infrastructure must be implemented before further development. Our roads are single lanes in many cases with poor road surfaces, associated traffic volume including delivery vans & lorries servicing these new properties. Congestion & bottle necks particulary school peak times. Our countryside, loss of natural habitat and the rural setting under threat of being over developed. Awareness of Tree Preservation Orders and to highlight Listed Buildings & homes.

I object to the increase from 1200 to 1750 homes as this would result in the coalescence of the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside) Therefor Requirement 6 of this Policy, which attempts to protect the ‘historic location of Ash Green’ is inadequate and would need rewording to prevent this increased potential for coalescence.

Development proposals in the vicinity of Ash Green must recognise the historic location of Ash Green village. The listed building the trees with Preservation Orders. Any development as a whole should not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a substantial green buffer that maintains separation between any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane.

We need to sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house. Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected.

Infrastructure before development. Requirement 9 (land and provision for a new road bridge at Ash Station to enable closure of the level crossing) must be completed before any development of Policy A29 commences.

Requirement 9 fails to address the other significant transport infrastructure improvements that are required to cope with the increases in traffic generated by Policy A29. Therefore solutions to the following areas are also required before any development of A29 is permitted.

1. The Street in Tongham
2. A331/A323 intersection
3. A31/White Lane junction

Policies A27, A28 and A29 collectively increase Ash Green village by 50%!!

We will no longer be a village, we will be victims of urban sprawl, losing our village identity forever.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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4.3.29 Amend to: “Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development.”

4.3.30 Amend to: “We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green.”

Policy P3 Amend to: (1) (c) should be amended to read “does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Policy P3 Amend to: (1) (c) should be amended to read “does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.”

Attached documents:
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Policy P3 Amend to: (1) (c) should be amended to read “does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.”

Attached documents:

Comment ID: pslp171/2294  Respondent: 17455745 / Christine Kavanagh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. Policy P3 - Countryside

• Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road

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Attached documents:
Ash Green’s historical location and identity. I believe Policy P3: Countryside (1) (c ) should be amended to “does not lead to greater physical or visual coalescence between Ash Green, the Ash and Tongham urban area and Aldershot”, in order to protect Ash Green as a separate village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Attached documents:

Comment ID: pslp171/3218  Respondent: 17501089 / J W Stevens  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Comment ID: pslp171/3224  Respondent: 17505345 / S.E. Marston  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Attached documents:

Comment ID: pslp171/1430  Respondent: 17528705 / Gleeson Developments LTD and Mr and Mrs T Poulson
Agent: Vail Williams LLP (Jane Terry)
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY P3: COUNTRYSIDE

Changes proposed to paragraph 4.3.29 of the Submission Local Plan confirm that the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second largest urban area. Given its relative sustainability, countryside to the south and east of the urban area is allocated as a strategic location for development. This statement, the subsequent allocation of A29 as a strategic site and the corresponding inclusion of the site within the defined urban area are supported.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2704  Respondent: 17528705 / Gleeson Developments LTD and Mr and Mrs T Poulson
Agent: Vail Williams LLP (Jane Terry)
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
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Attached documents:

Comment ID: pslp171/3215  Respondent: 17616161 / Kevin & Susan Fealey  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Attached documents:
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

Document part: Policy P4 - Flooding, Flood Risk and groundwater protection zones
Policy P4: Flooding, flood risk and groundwater source production

We welcome this policy and ask that reference is made to the recently increased climate change allowances required when considering flood risk. In view of these, the encouragement given to reducing flood risk on sites that include 'developed' flood zone 3b (functional floodplain) should be strengthened.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

We welcome addition of the new climate change allowance.

We ask for policy on developed Zone 3b floodplain to, where possible, encourage the layout of development within a site to be changed to reduce the footprint within the functional flood zone and to make more space for water. Currently, the policy reinforces existing layout (albeit with reference to an assessment).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

We welcome the policy to restrict development on the ‘developed’ flood zone 3b. This area does not appear to be shown on any of the Plan maps – we request that it is. The flood zone areas are ideally suited to provide green open space, with increased biodiversity, and we hope this objective can be added to this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Green Lane - Flooding & drainage

I have lived in Green Lane, 30 years’ since August 1986.

I strongly object to the planned 120 houses Waterloo Farm and 135 houses on Manor off Ockham Road North.

The land slopes significantly from East Horsley and during periods of heavy rainfall causing flooding on Ockham Road North and Green Lane.

Every year this is a problem having personally witnessed the flooding each year during periods of sustained rainfall. See attached photos June 2016

The building of roads and 255 houses on the two green fields currently absorbing the heavy rainfall during the winter and now summer months as experienced June 2016 would increase the flooding by creating a surface that would impact on the already major flood risk in the area.

The proposed 120 houses, A40, and would create a huge risk with increased flooding which was previously experienced when the current property, Oakland Farm was built a few years ago.

In addition the heavy rainfall during June 2016 Green Lane experienced heavy flooding in the road and overflowing the essential ditches. Again the land slopes significantly from Long Reach.

The proposed access via Green Lane to include Waterloo Farm is totally unacceptable, would create massive disruption to the local community along with the lack of drainage and infrastructure in the extremely narrow lane.

The the large lake on the National Camping Club of Great Britain site overflows into the ditch which in turn causing flooding in Green Lane running down towards our property, flooding our front garden. We have had flooding right up to the front door.

The gardens in the smaller private Green Lane previously Bungalow Lane adjacent to Watersmeet all flood during heaving rainfall. Four new properties’ two houses and two bungalows have been built in the lane late 1980/1990. A natural spring on the area of land to build the two bungalows was built over causing flooding to the gardens on the opposite side of the lane resulting in a land drain having to be built the complete length in all of the opposite gardens in the lane.

This involved massive intrusive disruption, months of work digging up gardens, taking down fences, trees and new manhole covers in the garden where we would rather not have had them.

Surrey Country Council/National Rivers Authority, built culverts in Green Lane and Thames Water Flooding, installed a non-returned valve on our property.

Both have made a slight improvement but not solved the flood risk.

The manhole covers have water pumping out along with sewage into the lane and our garden.

During heavy rain the water in the toilets in our house rises to almost overflowing. We are unable to use the toilet or pull the chain, as it would certainly flood the house. The gurgling from the toilet is very alarming also keeping you awake during the night.
Thames Water Sewer Flooding Mitigation arranged a survey to be undertaken by WERM Ltd to help with the sewage and manhole overflow. In 2007 a non-return valve fitted to help the situation. This has not helped as the toilet still overflows during heavy rainfall.

Severe flooding frequently occurs in Green Lane and Long Reach during heavy rain. Running along the eastern boundary, for the full length of the smaller Green Lane adjacent to our property, there is a ditch, which extends beyond the southern point of the private small lane and continues along the eastern boundary. This ditch is a land drain and specifically takes the overflow from the large lake to the south of the land, which is under the ownership of the National Camping Club of Great Britain.

On the front boundary, there is a further ditch which the ditch on the eastern boundary discharges. This is an important drainage ditch. Works of improvement were carried out by National Rivers Authority, two brick culverts were constructed, one of which discharges under Green Lane into a further ditch on the northern side of Green Lane.

John Faithfull originally purchased Watersmeet/now Oakland Farm about 1965 and subsequently purchased three of the adjoining sub-standard bungalows, and re-built these in the late 1960s.

He had his own company specializing and expert in plumbing and flooding having a lot of dealings with Surrey County Council and National Rivers Authority over the ditches and flooding area in Green Lane.

Although considered eccentric by some people, as he got older, he was an extremely knowledgeable man qualified in Hydraulics’ Research, building and flooding risks working tirelessly with and alongside National Rivers Authority.

My husband was employed by The National Physical Laboratory (NPL) at Teddington

The Hydraulic Research Organization department. Predicted the risk of heavy flooding that would result from the indiscriminate building of roads and housing on fields and water meadows. This has now been proven with annual increased rainfall (predicated increased future rainfall) in many parts of England.

The photographs’ of the recent flooding were taken in June 2016.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  
- IMAGE 1.jpg (3.0 MB)
- IMAGE 2.jpg (2.7 MB)
- IMAGE 3.jpg (3.5 MB)
- IMAGE 4.jpg (3.0 MB)

Comment ID: pslp171/1825  Respondent: 8561377 / The Guildford Society (Julian Lyon)  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

xx) The section on Flooding (Policy P4) does not provide much support for development or for a cohesive, comprehensive solution. We do not see that the policy is helpful enough and, read with the Infrastructure Delivery Plan at Appendix C, provides very little comfort to developers or local communities.

yy) The Guildford Society is adamant that the SANG policies – administered as an interpretation of the European Birds Directive – will bring about a massive failure to deliver Affordable Homes, particularly in the town centre. We believe that Policy P5 should be amended so that homes in the town centre are not required to deliver contributions to SANG because there is ample undesignated alternative natural greenspace (at Pewley Downs, The Chantry, the River Wey, Guildown, The Mount and the Hog’s Back) within walking distance and this should be sufficient to avoid harm to ground-nesting birds.
zz) Such an approach would need the cross-boundary co-operation of several local authorities but will enable Guildford to increase its yield of sustainable town-centre affordable housing.

aaa) We note the new references to climate change in 4.3.37, 4.3.43, 4.3.46 and Policy P4(C).

FLOODING AMENDMENTS

The Topic Paper ‘Flood Risk’ (June 2017) is a new addition to the Evidence Base.

Section 2.3 sets out the categories of Flood Risk zoning and notes that 3b is known as the ‘functional floodplain’ where water has to flow or be stored in times of flood.

The failure to identify in the plan suitable arrangements for managing flood water in any better or more organised way than hitherto is an opportunity missed and belies the importance of plan-led regeneration in the context of a brand new Local Plan aimed at providing for the next 16 years or so.

The Guildford Society has greater confidence in the comprehensive planning advocated by the Guildford Vision Group in aiming to store water and provide for greater areas of floodplain within less sensitive areas such as undercroft parking, terraced public areas and retention reservoirs below public squares.

The GVG plan also has the benefit of seeking to create walkways that should allow dry access for pedestrians to homes and business premises during a flood event.

There is no such plan or comprehensive aspiration in the Local Plan.

The Paper also cites the sequential testing in NPPF 101. This generates a circular argument in the Local Plan inasmuch as there is insufficient alternative land allocated for development to enable flood plains to be avoided, creating an increased likelihood that there will need to be development in the floodplain, and yet there is no specific flood mitigation plan in the town centre in the absence of any town centre planning within the Local Plan.

At 3.5 i) there is part of sentence missing – it is by no means clear what this is meant to be.

The local context identifies past flooding events and pays relatively little attention to pluvial flood risk which must become more prevalent with the greater areas of hard landscaping and buildings envisaged by the plan. This is equally true of developments where sustainable drainage systems pass water more effectively into the ground but which by nature may increase the level of the water table.

The Settlement Profiles – which still lump the entire Guildford Urban Area together as a single Settlement of wards, communities, amenities, convenience stores, differing levels of service provision (as witnessed by the Indices of Multiple Deprivation (2015) for each Lower Super Output Area, and as demonstrated by the Society in Annex 6 of our 2014 response) – do not adequately cover areas of local flooding, and could not highlight pockets of surface water stress, for example around Guildford Cathedral where run off affects local households in Ridgmount even before the allocated 100 homes are built there.

It is not clear that the Flood Risk Topic Paper has taken full account of the Section 19 Flood Investigation Report (2015) - [https://www.surreycc.gov.uk/__data/assets/pdf_file/0018/71910/4-Guildford-Borough-S19-Report.pdf](https://www.surreycc.gov.uk/__data/assets/pdf_file/0018/71910/4-Guildford-Borough-S19-Report.pdf) - that highlights some of the risks, and it is by no means clear that a detailed assessment has been made of the local hydrology and the impact of the various development proposals.

Full account needs to be made of the existing and modelled instances in local communities of fluvial flooding, surface water flooding, groundwater flooding, sewer flooding and any other sources of flooding (including the fragility of water supply pipework).

In the town centre, there are pinch points that lead to an unplanned for build-up of water, for which major strategic planning will be required both upstream and downstream. Upstream there should be some water management...
infrastructure – probably at both Shalford and at Shalford Meadows. In town there needs to be better water retention and water capacity management, and it is our contention this can only realistically be achieved as part of a master-planned regeneration of the riverside and town centre.

[Map]

In the above diagram, the width restrictions are illustrated by a dark blue circle, whereas those with height and width restrictions are in lighter blue. North is to the right of the map.

The Topic Paper does not provide any solutions to flooding, and does not really inform policy in the Local Plan.

The image below is taken from: https://flood-warning-information.service.gov.uk/long-term-floodrisk/map and allows a quick view of flood risk, including, in this instance, surface water flood risk in Guildford town centre.

[Map]

It will be important to increase the catchment upstream but there is not a lot of upstream in Guildford Borough. It seems Waverley has completed its flood plan, and that it does not increase catchment to benefit Guildford. It seems, anecdotally at least, that this is substantially due to a lack of cooperation by Guildford Borough Council.

There is also a need to address the water catchment increase beyond Waverley and in tributaries such as the Tillingbourne. This, and consequent impact on developable sites, are absent from the Topic Paper and the Plan. We understand that Guildford’s flood plan is still in development, and that it has 16 options including upstream catchment.

As there is so much missing from the plan itself and Topic Paper, we are at a loss to understand if the plan is anywhere close to being sound in terms of flood risk management. This is a shame because there is considerably more detail in the Key Evidence documents that have not been carried forward into this strategic planning document.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICY P4: Flooding Risk

WHPC supports this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [WHPC Draft Local Plan response July 2016.pdf](#) (2.2 MB)

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Comment ID: PSLPP16/7456  Respondent: 8563777 / Michael Brown  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The drainage is very poor around the East and West Horsley area, the area frequently floods.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7781  Respondent: 8566529 / Derek Corden  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

This policy specifically relates to land previously developed and under Para B there is the need for a sequential test. Whilst this may be a Government requirement, it is nonsense if the existing buildings on the site flood already. There should be total encouragement to redevelop such sites, almost above all others, to ensure that those buildings are taken out of flooding, given that there is inevitably betterment. To put obstacles in the way of betterment can make no sense whatsoever and will prejudice the ability to create a vibrant town centre which already has a paucity of land for development.

It has also been pointed out by this Group that there are no proposals in this Local Plan to seek to create additional flooding capacity upstream of the town centre in order to either reduce or completely eradicated town centre flooding. We have suggested lowering the Shalford Flood Plain to protect the town and wish to understand if this is a suggestion that has been fully explored. If it has we wish to understand the reasons why it has not been implemented.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3160  Respondent: 8568193 / Miss Edwina Attwood  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

4.I OBJECT to development in areas which are at risk of flooding (Policy P4)
National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. I am aware that this site often floods during winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: PSLPP16/2185  Respondent: 8570273 / Fiona Curtis  Agent: Fiona Curtis

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object to policy P4

Flood risk and water source protection zones Urban development on existing hardstanding would not create additional flood risk, especially where there is scope for improved flood resistance measures to be included in the design. Sites such as Woodbridge Meadows Industrial Estate and the Arriva bus depot, on the River Wey bank, are potential high-value brownfield sites that would not be available for housing if this policy is implemented. It is not the footprint of existing buildings that should limit future development, but the extent of existing hardstanding. Tarmac and concrete do not act as functional floodplain, and some land with hard standing close to the river, within the town centre and within easy walking distance of the railway station, provides an excellent opportunity for real urban regeneration that could protect the surrounding countryside.

I strongly believe that this policy should not be used as a convenient excuse not to build on the extensive area of brownfield sites between the station and Ladymead. Any new development in this area could easily be built on stilts with flood resistant ground floor parking in areas that are identified as high flood risk. This area has been built over successfully over the last 50 years. We do not need to stop now.

I do not support building directly on (as opposed to over) flood plain as the land is effectively a soak away, but intelligent architecture has been dealing with this problem for many decades in other parts of the UK and the globe.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

Comment ID: pslp171/2328  Respondent: 8570273 / Fiona Curtis  Agent: Fiona Curtis

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P4
| 4.3.37 | Flooding from rivers is not necessarily linked to climate change but can be due to poor management and drainage. It should be noted that flooding from surface water is also a major issue in parts of the borough and that due to fear of blight, areas subject to manageable damage from flooding often do not report this as it affects insurance and ability to sell. | Requires clarification |
| Evidence | Should include professional independent assessments for specific sites. This is particularly relevant for Worplesdon and parts of Ash as well as the town centre and Shalford. Flood zones are based on previous events without development. Large scale development on porous ground will naturally increase flood risk as any natural soak away is removed. A professional independent opinion would be needed to verify the real risk. | Comment |

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp171/294  **Respondent:** 8571521 / Surrey Nature Partnership (Sarah Jane Chimbwandira)  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2017 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We welcome and support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp171/1688  **Respondent:** 8573793 / Harry Eve  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2017 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

4.3.37 now highlights the need to take account of the effects of climate change. This should include the potential effect of a prolonged period of below average rainfall on the water supply in South-east England. Encouraging further net inwards migration into the region, as reflected in this draft local plan, will lead to even more pressure on water supplies and the need for expensive and undesirable solutions that may take many years to implement or prove impossible. Questions that should be asked are:

- Where will new reservoirs be located?
- How much energy will be required by desalination plants?
- What are the issues and costs involved in delivering water from desalination plants to inland locations such as Guildford?
- How much will water bills rise as a result of the solutions required.

Continuing to add more pressure on water supplies is clearly unsustainable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/5954  **Respondent:** 8575585 / Ian Macpherson  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy P4: Flooding, flood risk and groundwater source production

This is really out of GBC's control - GBC acting effectively as an agent - no comment.

It would seem unlikely that current European requirements that act as drivers will be rescinded, as they seem fairly fundamental, though detail of national implementation might be trimmed?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/6995  **Respondent:** 8575617 / Effingham Parish Council (Ian Symes)  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

P4 Protecting– Flood Risk

Support

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/17553  **Respondent:** 8581505 / Burpham Neighbourhood Forum (Jim Allen)  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

From the NPPF:
The policy P4 is far too wordy and long – it grants permission for anything in ‘a Zone 3b flood plain’ contrary to the NPPF.

The second paragraph is unsound, irrational and illogical.

No development should be contemplated in the ‘Wey Valley Flood Plain’ as its’ area has been reduced by nearly 50%, since the flood of 1902 swept the Guildford town bridge away. The policy should positively prevent development under these circumstances.

Introducing further reduction of land area in times of climate change is unsound.

The Policy should not include the word ‘Permitted’ within it.

It should be worded

“NO New Development will be permitted within the Zone 3b flood plain which is bounded by the ‘flood line (Zone 3b)’ on the 2009 generated flooding maps of the River Wey.” Except in accordance with the NPPF.

Repairs to structures already within the Zone 3b Flood Plain will be permitted for maintenance.

Should replacement or rebuilding of the structure be required -every effort should be made to remove it from the Zone 3b flood plain.

Whilst this will not compensate for the loss of the flood plain since 1902 it should prevent further disasters.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: pslp171/2186 | Respondent: 8581505 / Burpham Neighbourhood Forum (Jim Allen) | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P4 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| 4.3.39 |
| There should be no change to flow routes; the Council’s amendment has a fundamentally different meaning from the Environment Agency response [see below], while the EA stated “All other land surrounding this important flow routes [sic] is important and should be retained”, whereas the Council refers to “changes to flow routes”.

[Image]

Policy P4 Flooding
This policy should be negatively worded, for example; ‘Will not be permitted unless A-F’ due to severity of flood risk in an active flood plain categorised zone 3b areas.

Note: (4) Essential infrastructure is not defined.

[Page 62, Policy P4:Flooding, Paragraph (2)]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: BNF comments Local Plan 19 07 17 23 25 table.pdf (5.3 MB)
I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
### Comment ID: PSLPP16/6622  
**Respondent:** 8585697 / Laurence Edwards  
**Agent:**

**Document:**  
Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

Flood Risk and Water source protection  
Whilst requested by the Worplesdon Flood Forum, Wood Street Village has not been included within the Guildford Surface Water Management Plan. Development at Blackwell Farm is likely to increase the risk of surface water flooding at Wood Street Village and Fairlands.

### What changes (2016)/further amendments (2017) do you suggest should be made to the document?

**Attached documents:**

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### Comment ID: PSLPP16/15872  
**Respondent:** 8586369 / Mr Luigi Fort  
**Agent:**

**Document:**  
Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

### What changes (2016)/further amendments (2017) do you suggest should be made to the document?

**Attached documents:**

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### Comment ID: PSLPP16/15873  
**Respondent:** 8586369 / Mr Luigi Fort  
**Agent:**

**Document:**  
Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I OBJECT to development in areas which are at risk of flooding (Policy P4)
National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. I believe this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6429  Respondent: 8590753 / Mr Michael Anning  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2109  Respondent: 8591041 / Surrey Wildlife Trust (Mike Waite)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy P4: Flood risk and water source protection zones
We welcome the inclusion and content of this policy, especially with regard to (d) “the scheme incorporates flood protection, flood resilience and resistance measures appropriate to the character and biodiversity of the area and the specific requirements of the site.” Note para. 4.3.49 correct reference


What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Flood risk remains and areas such as Burpham, Worplesdon, Clay Lane and Seale and Sands have particular problems. Although flood risk will be modelled we are not yet at a position to alleviate the problems with flooding that already exists, often due to the cost.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Policy P4 - Flood Risk and Water Source Protection Zones

All development sites must have consideration to flood risk, not just on the development, but the effects on the surrounding areas. I object to P4 being used as a blanket reason for taking large tracts of development land out of the system willy-nilly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

POLICY P4 Flooding, flood risk and groundwater source production

CPRE is regularly in communication with the National Trust with regard to the Wey Navigation and with CPRE Kent where we have access to expertise on the topic of water supply. We hope that the Brexit decision will not reduce EU input to this sector. CPRE is concerned about the pattern of increased flooding over recent years which seems to be linked with climate change. It appears that storm severity is a factor in increasing water run-off which is partially due to housing growth. It appears to us that many areas of Guildford Borough are being increasingly affected by flooding and that reduced maintenance of rural roads has added to local problems in this context. It is anticipated that should building on the Green Belt countryside proceed as envisaged in the draft Local Plan, flooding problems will increase and the Environment Agency and Thames Water will be put under more intense pressure as they attempt to tackle major infrastructure problems relating to flooding, water supply and sewage issues. This increased activity will start at a moment when manpower cuts at these key organisations in this area are being implemented.
At the same time, the Environment Agency has warned much of Surrey that the balance of water supply and demand is “seriously stressed”. It is important, therefore, that aquifers are not used excessively for water irrigation purposes for the 140 golf courses in the county. Many of the major Guildford housing developments could be affected by water supply problems such as occurred when the National Trust heritage building of Clandon House was burnt down. The scale of housing projects outlined for the years ahead could certainly present a problem in this context.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to policy P4 Flood risk and water source protection zones. Urban development on existing hardstanding would not create additional flood risk, especially where there is scope for improved flood resistance measures to be included in the design. Sites such as Woodbridge Meadows Industrial Estate and the Arriva bus depot, on the River Wey bank, are potential high-value brownfield sites that would not be available for housing if this policy is implemented. It is not the footprint of existing buildings that should limit future development, but the extent of existing hardstanding. Tarmac and concrete do not act as functional floodplain, and some land with hard standing close to the river, within the town centre and within easy walking distance of the railway station, provides an excellent opportunity for real urban regeneration that could protect the surrounding countryside. We strongly believe that this policy should not be used as a convenient excuse not to build on the extensive area of brownfield sites between the station and Ladymead. Any new development in this area could easily be built on stilts with flood resistant ground floor parking in areas that are identified as high flood risk. This area has been built over successfully over the last 50 years. We do not need to stop now.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
4. POLICY P4

I OBJECT to development in areas which are at risk of flooding (Policy P4).

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be recommissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2309  Respondent: 8671969 / Valerie Thompson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

P4 Flood risk and Water sources

I object to a policy which states that building on the footprint of existing buildings is the only way to offset flood risks. Building on land, such as the Arriva bus depot, which are already on hardstanding will create NO extra risk.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1544  Respondent: 8687041 / Michael Aaronson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

I OBJECT not to the need to have robust flood protection measures but to the naive way they are applied in this Local Plan. Reading the descriptions of the flood risk at sites of which I have close acquaintance I wonder whether the planners have ever actually visited them. For example, the descriptions relating to Policies/Sites A46 and A47 bear no relation to the lived experience of wading through water in the car park to catch a train at Wanborough Station, or squelching along
the footpath that runs through Site A47, or getting bogged down in the heavy clay that underlies most of Site A46. This Policy reveals wishful thinking on a grand scale.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/1072</th>
<th>Respondent: 8687265 / Dagero Ltd (David Roberts)</th>
<th>Agent:</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</td>
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</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**POLICY P4 – Flood risk and water source protection zones**

I OBJECT. Urban development on existing hardstanding would not create additional flood risk, especially where there is scope for improved flood resistance measures to be included in the design. Sites such as the Arriva bus depot, on the River Wey bank, are potential high-value brownfield sites that would not be available for housing if this policy is implemented. It is not the footprint of existing buildings that should limit future development, but the extent of existing hardstanding. Tarmac and concrete do not act as functional floodplain, and some land with hard standing close to the river, within the town centre and within easy walking distance of the railway station, provides an excellent opportunity for real urban regeneration that could protect the surrounding countryside.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/2624</th>
<th>Respondent: 8693153 / Vicki Willetts</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</td>
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</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY P4 (FLOOD RISK AND WATER PROTECTION): • Limits development of urban, brownfield, hardstanding sites, pushing development unnecessarily into the countryside.

3

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/3583</th>
<th>Respondent: 8694785 / Nicolas Dixon</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The local services are already failing to cope particularly in times of heavy rain.
The manhole in my front garden overflows on various occasions when there has been high rainfall due to the backup of water in the main sewer.

During the very recent heavy rain one of the manholes in the main sewer in Green Lar has again overflowed leaving raw sewage in the road and surrounding ditches. Certain of the surrounding fields are also more to flooding and as in the long term it is expected that we will have more extreme weather this is a continuing problem. The proposed developments will of course exentuate the problem and major new sewage and disposal methods will be required.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/11231</th>
<th>Respondent: 8708289 / Frances King</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Flood Risk and water source protection zones:** I OBJECT The proposed Local Plan puts by far the majority of new housing on greenfield sites, this can only increase flood risk by concreting/tarmacing over land which at present acts, at least partially, as a catchment for excess rainwater. The better use of brownfield sites in already urban areas for housing with proper flood management would be more appropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/4497</th>
<th>Respondent: 8709249 / Geoff Spink</th>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY P4

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter
months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/4724  **Respondent:** 8711841 / Rosmarie Roberts-Kunz  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY P4 (FLOOD RISK AND WATER PROTECTION):

- Unreasonably limits development of urban, brownfield, hardstanding sites, pushing development unnecessarily into the countryside.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/17071  **Respondent:** 8717921 / Helen Jefferies  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- I object to the fact that modern building techniques appear to have been ignored such that there is almost no housing proposed for the town centre “due to flood risk”. In many other parts of the country this risk has been completely

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/11632  **Respondent:** 8721857 / Andrea Lightfoot  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Urban development on existing hardstanding would not create additional flood risk, especially where there is scope for improved flood resistance measures to be included in the design. Sites such as the Arriva bus depot, on the River Wey bank, are potential high-value brownfield sites that would not be available for housing if this policy is implemented. It is not the footprint of existing buildings that should limit future development, but the extent of existing hardstanding. Tarmac and concrete do not act as functional floodplain, and some land with hard standing close to the river, within the town centre and within easy walking distance of the railway station, provides an excellent opportunity for real urban regeneration that could protect the surrounding countryside.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9057  Respondent: 8723809 / Sally Blake  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to POLICY P4 – Flood risk and water source protection zones

• Inappropriately limits development of urban, brownfield, hardstanding sites, pushing development unnecessarily into the countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3225  Respondent: 8726529 / Eric Palmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY P4

I OBJECT to development in areas which are at risk of flooding (Policy P4)

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3496  Respondent: 8726529 / Eric Palmer  Agent:
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Attached documents:
However, urban development on previously developed concreted areas does not create increased flood risk, especially where there is the capacity for improved flood resistance measures to be included in the design. E.g. Walnut Tree Close and Woodbridge Meadows.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16913  Respondent: 8728865 / Neville Bryan  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Object

There are aspects of this policy which are acceptable; it is sensible to protect groundwater source protection zones. We note the maps used in some cases (example around the Clay Lane Link Road project) were inaccurate, missing as they did a key water course.

However, urban development on previously developed concreted areas does not create increased flood risk, especially where there is the capacity for improved flood resistance measures to be included in the design. E.g. Walnut Tree Close and Woodbridge Meadows.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1903  Respondent: 8728865 / Neville Bryan  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Object - All original objections remain

Wording amendments are not specific. We need to manage implications of changes and building on flooding. Specifically we mention site A26 (Blackwell Farm), as the runoff water courses have been identified as affecting Wood Street Village, Fairlands, etc... as well as environmentally protected areas (covered by GBC and SCC policy), such as the Thames Heath Basin SPA, Whitmoor Common, and wetlands downstream in the river Wey. These are covered in the Flooding Assessment produced by JBA, and submitted by Worplesdon Parish Council as part of the evidence base. Link attached.


What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2050  Respondent: 8729217 / Karen Stevens  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Climate change
I support the addition in para 4.3.37, which states that “New development should be carefully planned to ensure that vulnerability to the range of impacts associated with climate change is not increased.”

Land drainage
I also support requirement (5) in this policy that “all development proposals are required to demonstrate that land drainage will be adequate”. However, GBC has failed to put this policy into practice in forming its Plan and does not demonstrate exactly how it will prevent the increased impermeable surface water run off from the Blackwell Farm development exacerbating flooding at Wood Street Village, Fairlands and Whitmoor Common Special Protection Area (SPA).

In particular, it has not addressed the likely requirement (and cost) for two reservoirs to control flow – one of which (due to topography) would ideally be located in the north-east corner of the site, which is currently allocated for the Research Park extension.

The Whitmoor Common SPA does require flooding at times in order to maintain its wetland habitat, and so damming streams that flow from Blackwell Farm would not be a straightforward solution. The Plan does not explain how the developers of Blackwell Farm site would achieve the balance between damming up streams to prevent surface water run off flooding residential areas and preserving the wetland habitat of the SPA.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: KJS 2017 consultation response (rev 01F).pdf (7.6 MB)

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Attached documents:

Comment ID: PSLPP16/7672  Respondent: 8743073 / Darrell Howard  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

There are a number of areas within the Horsleys and Ockham environs which are subject to frequent flooding. Two of the most notable areas, Ockham Road North and the Ripley/A3 roundabout are not even mentioned in the Plan. Failure to address these locations as well as other sites that are prone to flooding is clearly unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3912  Respondent: 8744161 / Michael Bridge  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

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Comment ID: PSLPP16/3935  Respondent: 8744257 / Mary E Bridge  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

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<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/9273</th>
<th>Respondent: 8744417 / Mark &amp; Gillie Hammersley</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</td>
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<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16309</th>
<th>Respondent: 8749409 / Mrs Randall</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</td>
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</tr>
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</table>

Reference Policy P4 – Flood risk and water source protection zones, page 55 et seq

With regard to the provision of SuDS paragraph 4.3.48 states that “to ensure effective use over their life course, the Council will require appropriate management and maintenance requirements to be put in place”. It would be reassuring to know what robust arrangements the Council has to enforce this requirement and who would actually be responsible for the management and maintenance once the developments have been completed and the properties sold. This is of particular importance in the Ash area where the potential flooding issue has been raised time and again as of great concern when planning applications have been considered.

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Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/12302</th>
<th>Respondent: 8749473 / Charlotte Beckett</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</td>
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Comment ID: PSLPP16/16691  Respondent: 8772801 / David French  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Comment ID: PSLPP16/17022  Respondent: 8787969 / K Britton  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
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Attached documents:

Comment ID: PSLPP16/763  Respondent: 8790529 / Nigel Carter  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
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1.Much of the proposed areas for development are in low lying areas, and will be subject to flooding. The introduction of more hard surfaces – houses and driveways – will only increase the amount of surface water, and inhibit the ability of the land to drain naturally. The council seems to have overlooked the effect of the River Mole which is very close by, and which does flood.

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Attached documents:

Comment ID: PSLPP16/16494  Respondent: 8794753 / Andrew Beckett  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s
identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/1360  Respondent: 8795649 / G Pask  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2974  Respondent: 8796673 / Suzanne Burroughs  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7550  Respondent: 8798849 / David Williams  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2731  Respondent: 8798881 / H L Cousins  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/12744  **Respondent:** 8800545 / Bill Taylor  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to development in areas which are at risk of flooding (policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

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The site at Garlick's Arch (Policy A43) is identified on the Environment Agency's flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the

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**Comment ID:** PSLPP16/130  **Respondent:** 8804929 / Helen Beckett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

*Drainage and Flooding*
There are known sewage overflow problems in Ockham Road North and Green Lane. There will be serious capacity issues with the sewer network in the village going right through to the treatment works if the large numbers of dwellings proposed are constructed.

The amount of flooding experienced a couple of years ago meant many main roads were closed for weeks on end. We were forced to use small lanes to exit the village. By doubling the number of cars in the village, this issue will be exacerbated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/2357</th>
<th>Respondent: 8806305 / Laurence Cook</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>

POLICY P4 – Flood risk and water source protection zones

I OBJECT. Urban development on existing hardstanding would not create additional flood risk, especially where there is scope for improved flood resistance measures to be included in the design. Sites such as the Arriva bus depot, on the River Wey bank, are potential high-value brownfield sites that would not be available for housing if this policy is implemented. It is not the footprint of existing buildings that should limit future development, but the extent of existing hardstanding. Tarmac and concrete do not act as functional floodplain, and some land with hard standing close to the river, within the town centre and within easy walking distance of the railway station, provides an excellent opportunity for real urban regeneration that could protect the surrounding countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/5270</th>
<th>Respondent: 8810113 / Louise Stewart</th>
<th>Agent:</th>
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<tr>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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4. POLICY P4

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

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The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16537  Respondent: 8810849 / Charles Lee  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16644  Respondent: 8810849 / Charles Lee  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/2747  **Respondent:** 8813601 / Gaenor Richards  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I OBJECT to development in areas which are at risk of flooding.

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Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/10225  **Respondent:** 8817121 / Celia Howard  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/4020</th>
<th>Respondent: 8817537 / Kim Meredith</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to building on the Garlick Arch (A43) site as it is a known flood area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<table>
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<tr>
<th>Comment ID: PSLPP16/4023</th>
<th>Respondent: 8817537 / Kim Meredith</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to development on the A44 Send Hill site as it is in the Green Belt and is beautiful countryside which should be left alone.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/1166</th>
<th>Respondent: 8818017 / Anita Hose</th>
<th>Agent:</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Many of the areas proposed are subject to flooding.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16438</th>
<th>Respondent: 8818625 / Beth and Frank Fuller</th>
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I OBJECT to development in areas which are at risk of flooding (Policy P4)

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to development in areas which are at risk of flooding (Policy P4)
The Plan does not take adequate account of flood risk as required by National Planning Policy.

The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment. This area has flooded many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5568  Respondent: 8826081 / Simon Wilcockson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3121  Respondent: 8826177 / Charles Spence  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy P4 states that ‘Proposals for development in areas at risk of flooding will be refused if other suitable sites are reasonably available in areas at lower risk’. Given this policy, why have areas at risk of flooding been included? I object to the inclusion of these sites such as site A40, part of which already has significant surface water after heavy rain and is often waterlogged.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
POLICY P4

I OBJECT to development in areas which are at risk of flooding (Policy P4)

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/2970  **Respondent:** 8827809 / Robert Wood  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/11096  **Respondent:** 8828545 / Anjali Mittal  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

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I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.
The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/430  Respondent: 8834049 / Dana-Leigh Strauss  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

FLOODING

In the storms two years ago, there was flooding in West Horsley. Roads were impassable for weeks for pedestrians, cyclists and cars. Further building in the area will only exacerbate the problem especially as more impermeable surfaces are constructed that impede water from soaking into the ground and the current drain system cannot cope with the existing housing population.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15765  Respondent: 8836129 / Roger Shapley  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Urban development on existing hardstanding would not create additional flood risk, especially where there is scope for improved flood resistance measures to be included in the design. Sites such as Woodbridge Meadows Industrial Estate and the Arriva bus depot, on the River Wey bank, are potential high-value brownfield sites that would not be available for housing if this policy is implemented.

It is not the footprint of existing buildings that should limit future development, but the extent of existing hardstanding. Tarmac and concrete do not act as functional floodplain, and some land with hard standing close to the river, within the town centre and within easy walking distance of the railway station, provides an excellent opportunity for real urban regeneration that could protect the surrounding countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

1. Policy P4 – object
   1. I support the policy in principal to protect against flooding. However, there are insufficient safeguards.
   2. Developments increase hard surfaces, and reduce the amount of land that can be used to hold water in times of flood. Mitigation measures elsewhere must not be necessary. The development must incorporate all necessary mitigation measures.
   3. There must be no cost to the tax payer for permitting any developments in any area liable to flooding.
   4. All properties must be fully insurable using standard commercial insurance against flood damage, both now and for the foreseeable future.
   5. Developments must not increase pollution risk.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to policy P4 Flood risk and water source protection zones.

Urban development on existing hardstanding would not create additional flood risk, especially where there is scope for improved flood resistance measures to be included in the design. Sites such as Woodbridge Meadows Industrial Estate and the Arriva bus depot, on the River Wey bank, are potential high-value brownfield sites that would not be available for housing if this policy is implemented. It is not the footprint of existing buildings that should limit future development, but the extent of existing hardstanding. Tarmac and concrete do not act as functional floodplain, and some land with hard standing close to the river, within the town centre and within easy walking distance of the railway station, provides an excellent opportunity for real urban regeneration that could protect the surrounding countryside.

I strongly believe that this policy should not be used as a convenient excuse not to build on the extensive area of brownfield sites between the station and Ladymead. Any new development in this area could easily be built on stilts with flood resistant ground floor parking in areas that are identified as high flood risk. This area has been built over successfully over the last 50 years. We do not need to stop now.

I do not support building directly on (as opposed to over) flood plain as the land is effectively a soak away, but intelligent architecture has been dealing with this problem for many decades in other parts of the UK and the globe.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to policy P4 Flood risk and water source protection zones. This policy is coming at things from the wrong direction. Taking our green fields and concret ing them which are located in key water catchments is going to contribute more to flood risk than urban development on existing hardstanding. Suitable development in this area can reduce the current flood risk by the incorporation of modern flood water management systems into the design. This policy is not a positive one, it is just a policy being used as an excuse not to build on the extensive area of brownfield sites within the urban area. New development in this area could easily be built on stilts with flood resistant ground floor parking in areas that are identified as high flood risk. This area has been built over successfully over the last 50 years and will still exist, so why not develop it for the needs of the borough? We need all the green infrastructure to help with flood and surface water management but these are being removed at a stroke yet existing Brownfield sites will not be developed creating IMPROVED flood risk protection for the urban area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICY P4: Flooding...

I support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3097  Respondent: 8852289 / John F. Wood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object that with more roads and houses, there will be greater run-off of surface water and flooding problems will become worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10593  Respondent: 8855969 / Jonathan Murphy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to development in areas which are at risk of flooding (Policy P4).

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

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Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Comment ID: PSLPP16/17776</th>
<th>Respondent: 8858113 / Ramsey Nagaty</th>
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<td>Policy P4 - Flood Risk and Water Source Protection Zones</td>
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<td>I OBJECT to this policy. There are aspects of this policy which are acceptable; it is sensible to protect groundwater source protection zones, provided that the maps are accurate. However, urban development on hardstanding does not create increased flood risk, especially where there is the capacity for improved flood resistance measures to be included in the design.</td>
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It is not the footprint of existing buildings that should limit future development, but the extent of existing hard standing. Tarmac and concrete do not act as functional floodplain, and some land with hard standing close to the river, within the town centre and within easy walking distance of the railway station, provides an excellent opportunity for real urban regeneration that could protect the surrounding countryside.

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**Attached documents:**
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The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. This is nonsensical. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

1. I OBJECT to development in areas which are at risk of flooding (Policy P4)

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7627  Respondent: 8875457 / Mark Ground  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

4. I OBJECT to development in areas which are at risk of flooding (Policy P4)

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/403  Respondent: 8879841 / Jonathan and Theresa Hulford-Funnel  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the plan due to the impact upon flooding.

Ockham Road North and East Lane floods periodically, as do the gardens in this area. Building on this land is only going to make the situation worse. Our drains can’t cope with what we have already.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/7155  Respondent: 8881345 / Lynne Ground  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11573  Respondent: 8881537 / Jean Baptist  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/3330  **Respondent:** 8883489 / N & B Hinchliff  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

8. Drains, Water Supply, Flood Risk, Congestion:

Our drains, our water supply, our medical facilities and our roads cannot cope with the proposed number of new homes. Building this number of homes will lead to flood risk here and downstream (along the Wey and Thames). The planned development on Green Belt is therefore unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/5744  **Respondent:** 8883841 / Pamela French  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to development in areas which are at risk of flooding

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/17579  Respondent: 8889761 / A Dougherty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

11. I OBJECT to development in areas within known 'Enviroment Agency' high flood risk zones(NB. Garlicks Arch) as this will only create further impact both within these areas as well as further downstream.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4586  Respondent: 8892673 / Nick Forwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

4. I object to development in areas which are at risk of flooding (Policy P4)

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The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. As a local resident, I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay (in winter 2013 to the depth of 2 feet in places). Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9271  Respondent: 8892737 / David Eagle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to development in areas which are at risk of flooding (Policy P4)
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Attached documents:

Comment ID: PSLPP16/16968  Respondent: 8893057 / Dianne Garnett  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1.1  We object to policy P4 Flood risk and water source protection zones

1.2  Urban development on existing hardstanding would not create additional flood risk, especially where there is scope for improved flood resistance measures to be included in the design. Sites such as Woodbridge Meadows Industrial Estate and the Arriva bus depot, on the River Wey bank, are potential high-value brownfield sites that would not be available for housing if this policy is implemented. It is not the footprint of existing buildings that should limit future development, but the extent of existing hardstanding. Tarmac and concrete do not act as functional floodplain, and some land with hard standing close to the river, within the town centre and within easy walking distance of the railway station, provides an excellent opportunity for real urban regeneration that could protect the surrounding countryside.

1.3  We strongly believe that this policy should not be used as a convenient excuse not to build on the extensive area of brownfield sites between the station and Ladymead. Any new development in this area could easily be built on stilts with flood resistant ground floor parking in areas that are identified as high flood risk. This area has been built over successfully over the last 50 years. We do not need to stop now.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12605  Respondent: 8894657 / Jacob's Well Residents' Association (Janet Smith)  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I am totally opposed to any development on flood plains. Our village suffers from flooding, being close to the floodplain near Burpham Court Farm where a major road development - The Clay Lane Link Road - remains part of the local plan for infrastructure despite part of the area being 3b flood plain. The Slyfield Area regeneration project also proposes development on some 3b floodplain, to which I object.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1540  Respondent: 8894657 / Jacob's Well Residents' Association (Janet Smith)  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Although the JWRA welcomes the fact that flow routes will be considered as part of any Flood Risk Assessment, the JWRA still totally opposes and objects to any development on flood plains. Jacobs Well suffers from flooding, being close to the zone 3b floodplain near Burpham Court Farm where a major road development, The Clay Lane Link Road, is still under consideration. With town centre and SARP development going ahead, with related flood risk mitigation, plus climate change and the increased potential for flash storms, to ensure risk to properties is only once per 100 years, the Burpham Court Farm zone 3b flood plain is therefore even more important in reducing the risk of flooding in Jacobs Well and must be preserved as is and not developed upon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12138  Respondent: 8896097 / Andrew Fordham  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

4. POLICY P4

I OBJECT to development in areas which are at risk of flooding (Policy P4). National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/14755</th>
<th>Respondent: 8896161 / Carol Wilson</th>
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POLICY P4: Flooding, flood risk and groundwater source production

The **GBPSLP2016** says that “Detailed flood risk modelling has not been undertaken in all parts of the borough”. I **OBJECT** to proposals to remove areas relating to East and West Horsley from the Green Belt when this modelling has not been undertaken. It is clear that flood risk and groundwater source production is not properly under control in these areas and this has not been allowed for in the **GBPSLP2016**.

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<th>Comment ID: PSLPP16/6737</th>
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**FLOODING**

We object to GBC’s building of 1100 homes in land parcel A46 due to insufficient attention to the significant flooding risks already present in this area.

There is an extremely high water table in the Normandy/Flexford area and no reference in the GBC plans to improve the water/sewerage management. Already there is inadequate drainage in Normandy and sewerage back-flush problems are regularly experienced around Guildford Road and Glaziers Lane. Every winter the fields in and around Normandy are subject to extreme flooding and therefore unsuitable for building on.

The assessment carried out of the available land takes into account old data regarding flood risk and we question its value.

For a number of years there has been much concern about the high levels of flooding in St Mark’s Churchyard, Wyke and the field at the rear of The Old Vicarage is very boggy ground, subject to extreme flooding. Every winter the land is shin-deep in water and regularly floods some of the properties lining it (eg Tanglewood was flooded by the storms of recent years with several inches of water entering car and integral garage).

**Stream Through Land**

There is a significant stream which flows along the back of the Guildford Road properties that line this field (behind The Old Vicarage, Wyke). This runs very high in rainy weather and regularly flows over its banks.
Building development on this site and area would exacerbate existing and significant flooding problems. There would be far fewer fields to absorb the excess water and the new “hard-standing” would affect even more adversely the general drainage and sewerage, not to mention the strain added by an increased number of users.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to development in areas which are at risk of flooding (Policy P4)

The recent heavy rain and the flooding along Newark Lane highlight the difficult nature of our local communities. National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river, meaning that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed by the Council as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. The heavy clay soil of the area presents a greater risk and there is a clear knock on effect for the wider community. Clearly the Council’s assessment is not fit for purpose and needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I OBJECT TO POLICY P4 (FLOOD RISK AND WATER PROTECTION):

• Limits development of urban, brownfield, hardstanding sites, pushing development unnecessarily into the countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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**Comment ID:** PSLPP16/15017  **Respondent:** 8904129 / Elizabeth Ross  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/4183  **Respondent:** 8904673 / Colin Burnside  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

1. **POLICY P4**

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**I object to development in areas which are at risk of flooding (Policy P4)**

The Plan does not take adequate account of flood risk as required by National Planning Policy.

The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment. This area has flooded many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<th>Respondent: 8905537 / Christopher Ross</th>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18416  Respondent: 8909761 / Diana Grover  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

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I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.
I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that other that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The site 46 and site 47 are habitual flood areas. Given the geographical makeup of the Normandy and Flexford it is the fields that take the brunt of the water flowing from the Hogs Back and concreting over this will damage this natural flood plain. Having lived here for 13 years we have seen how badly impacted some areas around here are by flooding. We even have a Flood Forum that is attended by our local MP to ensure that we are on top of the issue. Areas have been identified around the site that are regularly an issue and I know that this is a genuine fear for residents that live around there. Just to show how saturated the land is – the vicar at St Marks Church has said how hard it is to dig burial graves as they fill up with water and this would apply to the field that they considered for a new cemetery. Also the farmer who has his cows in the large fields on the site 46 has recently said to a resident that there is no way his cattle can go on these fields from Oct to April due to the fact they are saturated even for animals.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: PSLPP16/13197  **Respondent:** 8919009 / Andrew Kukielka  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

1. **POLICY P4**

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: PSLPP16/11980  **Respondent:** 8921377 / Paul Maycox  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5838  Respondent: 8926305 / Jeanette Allcard  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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<td>Also there is a great risk of floodship as there are lots of water meadows in this area.</td>
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<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</th>
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<td>P4 Flood Risk</td>
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<td>I welcome the policy to restrict development on the ‘developed’ flood zone 3b. The flood zone areas are ideally suited to provide green open space, with increased biodiversity, and I hope this objective can be added to this policy.</td>
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<td>I object because of the issue of flooding. We are on clay and water is slow to drain away. The ditch in front of my house is in full spate at least once every winter. The water hits the bridge and fountains 3ft into the air. The surface water is at times intolerable for pedestrians I fear that run off from more buildings will lead to flooding.</td>
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</table>
4. I object because in nearly 30 years living in our house we have never been flooded. But if so many houses are built behind us I fear that the risk of flooding to peoples homes will increase.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/11703  **Respondent:** 8928033 / P. Richardson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to development in areas which are at risk of flooding (Policy P4)

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/11927  **Respondent:** 8928289 / Trevor Skerritt  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/64  Respondent: 8929057 / East Horsley Parish Council (Nick Clemens)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY P4: Flooding...

We support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4453  Respondent: 8930209 / Ray Corstin  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY P4

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/5462  **Respondent:** 8930465 / Michael & Carol Cook  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object to all development in areas at risk from flooding.

Any development carried out in or around the Clandons, which are renowned for their water meadows will add to the flooding, which so often occurs in the Wey and Mid Thames Valleys and any additional large developments will just add to the misery for those who live in those areas. The Government has cancelled the flood relief programme for the Mid Thames area a few years ago.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/8760  **Respondent:** 8933185 / Peter See  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

'4.3.36 Policy P4: Flooding, Flood Risk and Groundwater Source Production

in regards: with regard

outside of the: outside the

Note: See Paragraph 4.6.51 and 4.6.55 for standard English and consistency.

Page 55 Policy P4: Flood Risk and Water Source Protection Zones are defined based on definitions: are based on definitions

demonstrate to be preferential: demonstrate that it is to be preferred to 4.3.44

there are demonstrated to be: it can be shown that there are 4.3.45

In such instance, applicants: Also, the applicants life course: life

only be granted permission if: be granted permission only if

taken regard to: taken into account

4.3.49
and guidance fully supports: and guidance fully support 4.3.60 Suitable Alternative Natural Greenspace (SANG)

Cannot not: cannot

4.3.62

This is: These are

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
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<th>Comment ID: pslp171/34</th>
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4.3.36 Policy P4: Flooding, Flood Risk and Groundwater Protection Zones

in regards: with regard

Note: The words 'in regards to' are colloquial and they are not entirely suitable for a formal document. The words 'with regard to' are closer to standard English.

4.3.40

outside of the: outside the

Note: The words 'outside of' are not standard English. Also, the word 'of' is entirely superfluous and does not help clarity. In addition, you are not being consistent as paragraphs 4.6.51 and 4.6.55 say 'outside'. These paragraphs contain standard English and all of this Local Plan should have similar standard English.

You have corrected some of the text in the previous Local Plan. Why not correct all of it?

**Page 62 Policy P4: Flooding, Flood Risk and Groundwater Protection Zones**

4.3.44

there are demonstrated to be: it can be shown that there are

4.3.48

taken regard to: taken into account

4.3.49

and guidance fully supports: and guidance fully support

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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Page 62 Policy P4: Flooding, Flood Risk and Ground Water ce Protection Zones

4.3.44
there are demonstrated to be: it can be shown that there are

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taken regard to: taken into account

4.3.49
and guidance fully supports: and guidance fully support

Attached documents:

Comment ID: pslp171/814  Respondent: 8933537 / Annie Ladd  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P4

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**Comment ID:** PSLPP16/17113    **Respondent:** 8940225 / Glen Ruddy    **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPP16/16044    **Respondent:** 8941761 / FLGCA (Paul Kassell)    **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

FLAG generally supports this policy particularly the paragraph:

"All development proposals will be required to demonstrate that they will not result in an increase in surface water run-off and should have regard to appropriate mitigation measures identified in the Guildford Surface Water Management Plan or Ash Surface Water Study. Priority will be given to incorporating SuDs (Sustainable Drainage Systems) to manage surface water drainage, unless it can be demonstrated that they are not appropriate. Where SuDs are provided, arrangements must be put in place for their management and maintenance over their full lifetime"

It should be noted that restricting the rebuilding of a structure to the same footprint of a previous structure is not necessary. It should be restricted to the size of the previous hard standing area.
<table>
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<th>Comment ID: PSLPP16/9370</th>
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<td>Policy P4: Flood Risk</td>
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<tr>
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<tr>
<td>No comment. This should not be taken to imply support for this policy.</td>
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<thead>
<tr>
<th>Comment ID: PSLPP16/1650</th>
<th>Respondent: 8957441 / Hazel Cleasson</th>
<th>Agent:</th>
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<tr>
<td>Flooding: - I cannot see into the future any more than the next person, but I would question the idea of building on land that has flood issues be they minor or major. If this summer is a reflection of weather to come then our rain fall/water table is likely to increase also. The use of &quot;Suds&quot; will improve surface drainage agreed, but where will the addition fluvial water go, especially if some of the historic courses are now blocked by new development foundations. I agree we have to plan for tomorrow but better to wonder &quot;what if&quot; today than &quot;if only&quot; some time in the maybe not too distant future. Unless maybe Guildford could be renamed Guildford on Stilts or Guildford on Water?</td>
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<tr>
<th>Comment ID: PSLPP16/2542</th>
<th>Respondent: 8958369 / B.P. Austin</th>
<th>Agent:</th>
</tr>
</thead>
</table>
Flood Risk.

1. I support policy P4 on flood risk. But should not the main title be “Flooding, Flood Risk and Ground Water Source “PROTECTION” not “PRODUCTION”?

10. When the flooding risks are so clearly recognised why is such a large proportion of new housing proposed for the Horsley, Send and Wisley areas which constitute, on GBC’s own map, the largest flooding hotspot in the borough?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy P4 (Flooding, Flood Risk and Groundwater Protection Zones)

No significant changes have been made to Policy P4 in the Guildford Borough Proposed Submission Local Plan: Strategy and Sites (2017) following the 2016 consultation. As identified in our previous representations, the Environment Agency Strategic flood mapping indicates that the Site may be affected by flooding. Catesby Estates Limited are already engaged in detailed discussions with the Environment Agency (EA) regarding the Site and have undertaken modelling which confirms that the extent of flood zones 2 and 3 within the Site are far less than those shown on the EA’s current map. The majority of the Site lies outside the floodplain and is located in Flood Zone 1 (Low Probability – land assessed as having a less than 1 in 1,000 annual probability of flooding from rivers and sea). Catesby have submitted the final, modelled, floodplain information in the format required for the flood map to be updated. The EA will then complete final internal and external checking before starting to change the Flood Map itself, this includes determining how the new mapping ties are inserted into the existing mapping to ensure a smooth transition between data.

Notwithstanding the low probability of flooding at the Site, any new development will benefit from a flood mitigation strategy which will include setting finished floor levels for new dwellings with a suitable freeboard and providing a safe access route, even in the event of flooding elsewhere.

A surface water management strategy will also be implemented to manage surface water runoff in a sustainable manner, with key features potentially providing areas of ecological and amenity value as well as restricting the discharge into the watercourse. The provision of a sustainable drainage system as part of the residential development will ensure that the impact of development upon the local surface water drainage network can provide betterment to existing greenfield runoff rates. The proposed development will not result in increased flood risk on site or elsewhere in accordance with Policy P4.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/11966</th>
<th>Respondent: 8979265 / Rachel Taylor</th>
<th>Agent:</th>
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I object to development in areas at risk of flooding (Policy P4)

The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<th>Comment ID: PSLPP16/8673</th>
<th>Respondent: 9050337 / Nigel Geary</th>
<th>Agent:</th>
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I support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Drainage/Surface Water

Our foul water mains drainage system is continuously having to be pumped and cleaned as it struggles to cope with the present demand. Therefore, new major development would need complete replacement. This would cause major upheaval of our road network and devastation to local wildlife. Surface water drainage would be further reduced leading to more flooding in the area. Many national studies prove that the increase in building further exacerbates this problem and no counter measures have proven to be sufficient.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

POLICY P4: Flood risk and water source protection zones

OBJECT. There are aspects of this policy which are acceptable; it is sensible to protect groundwater source protection zones, provided that the maps are accurate.

However, urban development on hardstanding does not create increased flood risk, especially where there is the capacity for improved flood resistance measures to be included in the design. Sites such as the Arriva bus depot, on the River Wey bank, are potential high value brownfield land which may not be used for housing because of this policy. The footprint of existing buildings should not be the limit of future development, but the extent of existing hard standing. Tarmac and concrete do not act as functional floodplain, but some land with hard standing close to the river, within the town centre and within easy walking distance of the train station, provides an exciting opportunity for real urban regeneration which could protect the surrounding countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Flooding: I strongly object to the new draft plan in respect of flooding. The site behind Ockham Road North in East Horsley is partially a level 3 flood risk area and as local residents we are well aware of how much standing water there is in our gardens after rainfall. Building on such land will only exacerbate the problem. Our drains can't cope now causing chaos on our local roads during heavy rainfall.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Drainage

There may be a serious under capacity of existing sewers and treatment works to cope with the large number of dwellings. We already had considerable flooding (involving sewage) earlier this year, both on the roads and the fields, with the water draining down from the fields after heavy rain. Where will it go if the fields are turned to housing?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/12377  Respondent: 9237953 / Patricia Wood  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object that with more roads and houses, there will be greater run-off of surface water and flooding problems will become worse

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/168  Respondent: 9245313 / David Murray  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Several of the proposed development areas are shown as at flood risk on your flood hotspot map, yet there is no project to deal with this, only the use of balancing ponds within each site. Will this approach cope with the less frequent but heavier rainfall predicted due to climate change?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4477  Respondent: 9298465 / Peter Grover  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY P4

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14947  **Respondent:** 9327009 / sp2 Consulting Limited (Stephen Parker)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT. There are aspects of this policy which are acceptable; it is sensible to protect groundwater source protection zones, provided that the maps are accurate. However, urban development on hardstanding does not create increased flood risk, especially where there is the capacity for improved flood resistance measures to be included in the design. Sites such as the Arriva bus depot, on the River Wey bank, are potential high value brownfield land which may not be used for housing because of this policy. The footprint of existing buildings should not be the limit of future development, but the extent of existing hard standing. Tarmac and concrete do not act as functional floodplain, but some land with hard standing close to the river, within the town centre and within easy walking distance of the train station, provides an exciting opportunity for real urban regeneration which could protect the surrounding countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10750  **Respondent:** 9334785 / Carol Cook  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to all development in areas at risk from flooding (Policy P4)

Any development carried out in or around the Clandons, which are renowned for their water meadows will add to the flooding, which so often occurs in the Wey and Mid Thames Valleys and any additional large developments will just add to the misery for those who live in those areas. The Government has cancelled the flood relief programme for the Mid Thames area a few years ago.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10637  **Respondent:** 9335041 / David Reeve  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Policy P4: Flood Risk and Water Source Protection Zones

Policy P3 states that “Development in areas at risk of flooding … will be permitted provided that … the proposal passes the sequential and exception test (where required) as outlined in the NPPF and Government guidance”.

Paragraph 4.3.40 of the draft Local Plan states that “In accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.”

This appears to show a clear intention to act in a way that is at odds with the precautionary principle. The approach documented in NPPF paragraph 100 states that “Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change …”. The position seems to be clear; the draft Local Plan seems to have been drawn up on the basis that it is more important to deliver the full OAN (despite the problems in the calculation of the housing number that have already been described) than it is to ensure that flood risk is minimised. This ducks the whole question of responsible plan-making, and the implicit obligations of the plan makers to the eventual occupants of new dwellings.

I therefore OBJECT to this policy, and strongly urge that it should be redrafted on a suitably precautionary basis to absolutely minimise flooding risk; if that approach puts a constraint on the number of houses that can be provided for in the Local Plan, so be it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2633  Respondent: 9335041 / David Reeve  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The new final sentence in paragraph 4.3.39 is too weak. Replace “should” by “must”.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6285  Respondent: 9607905 / Anne Pascoe  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

4. I OBJECT to development in areas which are at risk of flooding
National Planning Policy states that local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identity areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s floodmap as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2, having between a 1% and 0.1% annual probability of river flooding. Knowing the area well, I am well aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly, the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6435  Respondent: 9607905 / Anne Pascoe  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10512  Respondent: 10299041 / F McHugh  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to development in areas which are at risk of flooding (Policy P4)

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8220  Respondent: 10662849 / Garry Walton  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY P4 – Flood risk and water source protection zones

I OBJECT. Urban development on existing hard standing would not create additional flood risk, especially where there is scope for improved flood resistance measures to be included in the design. Sites such as the Arriva bus depot, on the River Wey bank, are potential high-value brownfield sites which would not be available for housing under this policy. It is not the footprint of existing buildings that should limit future development, but the extent of existing hard standing. Tarmac and concrete do not act as functional floodplain, and some land with hard standing close to the river, within the town centre and within easy walking distance of the railway station, provides an excellent opportunity for real urban regeneration that could protect the surrounding countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4527  Respondent: 10667073 / Trudi Harris  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Knowing the area well, I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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The brownfield site to the south of Garlick’s Arch (A43) at Burnt Common is not at risk of flooding. This makes it an even more sensible solution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
• I object to the fact GBC knowingly proposes increased developments in and around the village that will exacerbate known existing flash flooding problems in the area (including the Portsmouth Road which runs alongside the Burnt Common site). I know they are aware of this because I and other residents previously submitted pictorial evidence as part of the 2014 Local Plan consultation process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1138  Respondent: 10717985 / Alison Drennan  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the changes in policy P4 Flood risk and water source protection zones. It is disingenuous and a misrepresentation to state that development on existing hardstanding (e.g. Woodbridge Meadows Industrial Estate and the Arriva bus depot, on the River Wey bank) creates additional risk of flooding. This policy amendment unnecessarily removes these valuable brownfield sites from the scope of the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17908  Respondent: 10722049 / Richard Smith  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

1. I OBJECT to development in areas which are at risk of flooding (Policy P4)

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11708  Respondent: 10723553 / Judith Pound  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4 
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  
I object to development in areas at risk of flooding (Policy P4). The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council’s own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16815  Respondent: 10723553 / Judith Pound  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4 
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  
I OBJECT TO developments that may be at risk of flooding – this is not being adequately considered as required by National Planning Policy and furthermore such developments are likely to increase the flood risk of existing houses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6971  Respondent: 10724769 / P. Broughton  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4 
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  
I object that the building will be on a site that regularly floods. Will this push the problem further down into the village? I live in Greyfriars Road. If this development causes my house to flood I will sue the Council for any damage incurred plus the devaluation of the property.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10843  Respondent: 10731329 / Sheila Hookins  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4 
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

Section page number  Page 95 of 359
Document page number 1977
I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6088  Respondent: 10734241 / A. Cude  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

As you will be fully aware, existing drainage & sewerage infrastructures barely cope with the volume of homes in the immediate area having already been stretched beyond their limits due to housing developments over the last 30 / 40 years - which would only ever be alleviated by massive civil engineering reconstruction works including new handling plants etc, which clearly haven't been considered or addressed in these development proposals. 485 houses will probably mean at least 1000 people & 500 cars.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14782  Respondent: 10735777 / S. May  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<thead>
<tr>
<th>Comment ID: PSLPP16/4174</th>
<th><strong>Respondent:</strong> 10742945 / Trevor Brider</th>
<th><strong>Agent:</strong></th>
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<tr>
<td>5. As a resident of West Horsley I know what it is like to have my previous home flooded. I believe that no major works have been undertaken since the incident at my previous home to prevent this happening again. As such the drainage system of West Horsley isn’t capable of taking the water or waste from more homes. Thames Water don’t appear to have any plans in place in the near future to alleviate this.</td>
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<tr>
<th>Comment ID: PSLPP16/6936</th>
<th><strong>Respondent:</strong> 10756449 / Richard and Valerie Overton</th>
<th><strong>Agent:</strong></th>
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<tr>
<td>We object to development in areas which are at risk of flooding (Policy P4)</td>
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<tr>
<td>The Plan does not take adequate account of flood risk as required by National Planning Policy.</td>
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<tr>
<td>The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment. This area has flooded many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan.</td>
<td></td>
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<tr>
<th>Comment ID: PSLPP16/4973</th>
<th><strong>Respondent:</strong> 10758593 / Richard &amp; Delia Baker</th>
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<tr>
<td>1. <strong>OBJECT</strong> to development in areas which are at risk of flooding</td>
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<td>National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.</td>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to development in areas which are at risk of flooding (Policy P4)

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14  Respondent: 10772865 / Peter Chandler  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Some areas of Normandy are already prone to flooding and development in and on this area will only serve to worsen these problems. We have seen the disastrous effects this can have in other areas and it should be noted that development on the scale proposed will almost certainly introduce similar issues in Normandy and the surrounding areas

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13595  Respondent: 10773441 / Barry Marshall  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID: PSLPP16/11539  ** **Respondent: 10774145 / P Jordan  ** **Agent:**

**Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID: PSLPP16/10176  ** **Respondent: 10780929 / Naren Nanda  ** **Agent:**

**Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4042  Respondent: 10781729 / Sylvia Williams  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing to object to most of the proposals in the Guildford Plan on the following grounds:

Having lived in West Horsley for 60 years I know only too well the drainage problems we experience, in particular sites A41 and A38 alongside East Lane and site A40 at the bottom of my back garden and almost adjacent to the lake at the Camping Club’s site. ANY MORE CONCRETE will exacerbate the flooding we now experience at times.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1422  Respondent: 10782625 / Heather Alexander  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13690  Respondent: 10782625 / Heather Alexander  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT TO POLICY P4 (FLOOD RISK AND WATER PROTECTION):

- Limits development of urban, brownfield, hard standing sites, pushing development unnecessarily into the countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15286  Respondent: 10782689 / Murray Dudgeon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to development in areas which are at risk of flooding (Policy P4)

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Attached documents:

Comment ID: PSLPP16/9122  Respondent: 10785633 / Penelope Eagle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/11134</th>
<th>Respondent: 10787073 / Clare Arnold</th>
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<tr>
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</table>

Policy P4 - Flood risk - I object to the lack of Flood Risk monitoring that has been performed and this will present significant risk to the area

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**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15019</th>
<th>Respondent: 10796417 / Richard Shenton</th>
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<th>Comment ID: PSLPP16/855</th>
<th>Respondent: 10798049 / Steve &amp; Maureen Knight</th>
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</table>

Object – I am totally opposed to building on flood plains and not taking due regard for water courses. Flooding remains a constant risk in our area and will be worse if uncontrolled building occurs. In the local plan AECOM has high-lighted some key areas including SARP

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
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<tr>
<th>Comment ID: PSLPP16/322</th>
<th>Respondent: 10799169 / Neal Basson</th>
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</table>

Drainage/flooding

The land between Silkmore Lane and Ripley Lane is frequently subjected to such serious flooding that Ripley lane becomes absolutely impassable several times per year. This land slopes significantly towards Ripley Lane, and during periods of sustained rainfall, flooding always occurs. Severe flooding also frequently occurs on The Street, East Lane, and Long Reach, to the extent that these roads, and in particular the hill under the railway line often become impassable.

This is also the case in the road where I live – Green Lane. There is already an under-capacity of existing drainage, sewers and treatment works to cope with heavy rainfall. When heavy rain does occur, the water in the toilets in our house rises alarmingly, and the drains and sewers flood the road and our garden, requiring several visits from the water company to clean and sanitise the ground. The current infrastructure is unable to deal with the requirement.

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<th>Comment ID: PSLPP16/331</th>
<th>Respondent: 10799169 / Neal Basson</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( ), is Sound? ( ), is Legally Compliant? ( )</td>
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</tbody>
</table>

**POLICY P4: Flood risk and water source protection zones**
OBJECT. There are aspects of this policy which are acceptable; it is sensible to protect groundwater source protection zones, provided that the maps are accurate.

However, urban development on hardstanding does not create increased flood risk, especially where there is the capacity for improved flood resistance measures to be included in the design. Sites such as the Arriva bus depot, on the River Wey bank, are potential high value brownfield land which may not be used for housing because of this policy. The footprint of existing buildings should not be the limit of future development, but the extent of existing hard standing. Tarmac and concrete do not act as functional floodplain, but some land with hard standing close to the river, within the town centre and within easy walking distance of the train station, provides an exciting opportunity for real urban regeneration which could protect the surrounding countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18377  Respondent: 10799169 / Neal Basson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

OBJECT. There are aspects of this policy which are acceptable; it is sensible to protect groundwater source protection zones, provided that the maps are accurate.

However, urban development on hardstanding does not create increased flood risk, especially where there is the capacity for improved flood resistance measures to be included in the design. Sites such as the Arriva bus depot, on the River Wey bank, are potential high value brownfield land which may not be used for housing because of this policy. The footprint of existing buildings should not be the limit of future development, but the extent of existing hard standing. Tarmac and concrete do not act as functional floodplain, but some land with hard standing close to the river, within the town centre and within easy walking distance of the train station, provides an exciting opportunity for real urban regeneration which could protect the surrounding countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/500  Respondent: 10799169 / Neal Basson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

OBJECT. There are aspects of this policy which are acceptable; it is sensible to protect groundwater source protection zones, provided that the maps are accurate.

However, urban development on hardstanding does not create increased flood risk, especially where there is the capacity for improved flood resistance measures to be included in the design. Sites such as the Arriva bus depot, on the River Wey bank, are potential high value brownfield land which may not be used for housing because of this policy. The footprint of existing buildings should not be the limit of future development, but the extent of existing hard standing. Tarmac and concrete do not act as functional floodplain, but some land with hard standing close to the river, within the town centre
and within easy walking distance of the train station, provides an exciting opportunity for real urban regeneration which could protect the surrounding countryside.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
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<tr>
<th>Comment ID: PSLPP16/17527</th>
<th>Respondent: 10799425 / Guildford Greenbelt Group (Susan Parker)</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
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**We object** to policy P4 Flood risk and water source protection zones

Urban development on existing hardstanding would not create additional flood risk, especially where there is scope for improved flood resistance measures to be included in the design.

Sites such as Woodbridge Meadows Industrial Estate and the Arriva bus depot, on the River Wey bank, are potential high-value brownfield sites that would not be available for housing if this policy is implemented.

It is not the footprint of existing buildings that should limit future development, but the extent of existing hardstanding. Tarmac and concrete do not act as functional floodplain, and some land with hard standing close to the river, within the town centre and within easy walking distance of the railway station, provides an excellent opportunity for real urban regeneration that could protect the surrounding countryside.

We strongly believe that this policy should not be used as a convenient excuse not to build on the extensive area of brownfield sites between the station and Ladymead. Any new development in this area could easily be built on stilts with flood resistant ground floor parking in areas that are identified as high flood risk. This area has been built over successfully over the last 50 years. We do not need to stop now.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/13430</th>
<th>Respondent: 10800065 / David Thompson</th>
<th>Agent:</th>
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I object to development in areas at risk of flooding (Policy P4)

The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
OBJECT. There are aspects of this policy which are acceptable; it is sensible to protect groundwater source protection zones, provided that the maps are accurate.

However, urban development on hardstanding does not create increased flood risk, especially where there is the capacity for improved flood resistance measures to be included in the design. Sites such as the Arriva bus depot, on the River Wey bank, are potential high value brownfield land which may not be used for housing because of this policy. The footprint of existing buildings should not be the limit of future development, but the extent of existing hard standing. Tarmac and concrete do not act as functional floodplain, but some land with hard standing close to the river, within the town centre and within easy walking distance of the train station, provides an exciting opportunity for real urban regeneration which could protect the surrounding countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

1. I object to development in areas which are at risk of flooding (Policy P4)

The Plan does not take adequate account of flood risk as required by National Planning Policy.

The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk category than the Council’s own assessment. This area has flooded many times in recent years and therefore the Council’s assessment is not conclusive enough to be included in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

The Plan does not take adequate account of flood risk as required by National Planning Policy.

The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment. This area has flooded many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan. I believe that a number of assessments have graded the flood risk as low, which I really find, literally, unbelievable.

Although I’ve lived in this area “only” since 1997, I’ve witnessed many years of flooding with varying degrees of impact.
Clearly the 2013/14 floods were particularly bad, with both Portsmouth Road & Send Marsh Road severely impacted, along with much of the surrounding land much of which is encapsulated within your plans, especially the proposed Garlick’s Arch development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12454  Respondent: 10805537 / Robert Mote  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

** I object to development in areas at risk of flooding (Policy P4)

The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11044  Respondent: 10809377 / Bernice Williams  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY P4

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough's identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick's Arch (A43) is identified on the Environment Agency's flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council's SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay.

Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11890  Respondent: 10811361 / Simon Crago  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to development in areas which are at risk of flooding (Policy P4).

Building in higher flood risk areas merely adds additional strain on existing emergency services when the inevitable floods occur.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12362  Respondent: 10811681 / Linda Knight  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

4. I object to development in areas at risk of flooding (Policy P4)

The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1794  Respondent: 10815393 / Mary E Smith  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the 2016 Draft Local Plan

I object to, robbing us of the Green Belt, [text unreadable] aim to build so much, and cover the land in concrete where is the surface water going to go? (obviously on Send Marsh), We will be absolutely flooded. It is all wrong.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
4. I object to development in areas which are at risk of flooding

The Plan does not take adequate account of flood risk as required by National Planning Policy.

The site at Garlick’s Arch is classified by the Environment Agency as being in a greater risk than the Council’s own assessment. I have witnessed flooding many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site regularly floods several times a year and especially during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6632  Respondent: 10829121 / Julie Brown  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to POLICY P4 – Flood risk and water source protection zones
· Inappropriately limits development of urban, brownfield, hardstanding sites, pushing development unnecessarily into the countryside

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3869  Respondent: 10833537 / AC Vause  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1SFRA has been used to guide development towards areas at the lowest risk offloading and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s
identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick's Arch (A43) is identified on the Environment Agency's flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding.

Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5822  Respondent: 10836033 / Katherine Gervasio  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to development in areas which are at risk of flooding

The Garlick’s Arch Site (A43) is classified as a higher risk of flooding by the Environment Agency in the Council’s own assessment. This area has flooded many times in recent years so should not be included in the development. This Plan does not take adequate account of flood risk as required by National Planning Policy. It will mean misery for those who buy houses on this site!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16676  Respondent: 10836033 / Katherine Gervasio  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to development in areas which are at risk of flooding (Policy P4)

The Garlick’s Arch Site (A43) is classified as a higher risk of flooding by the Environment Agency in the Council’s own assessment. This area has flooded many times in recent years so should not be included in the development. This Plan does not take adequate account of flood risk as required by National Planning Policy. It will mean misery for those who buy houses on this site!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

 Attached documents:

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Comment ID: PSLPP16/7069  Respondent: 10837089 / R. Robertson  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to development in areas which are at risk of flooding (Policy P4)

The Garlick’s Arch Site (A43) is classified as a higher risk of flooding by the Environment Agency in the Council’s own assessment. This area has flooded many times in recent years so should not be included in the development. This Plan does not take adequate account of flood risk as required by National Planning Policy. It will mean misery for those who buy houses on this site!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

 Attached documents:
Surface water/ Flood risk

Surface water problems are evident over the whole of the Normandy area with standing and often flowing water from drains into the roads and adjacent land in heavy rain. The drainage system at present is at capacity and there is absolutely no doubt that the proposed development of A46 would be catastrophic for surface water in Normandy and nowhere for the water to go when it rains, let alone the volumes of water generated by the development. Even part of the A46 site which adjoins a stream is a flood plain when the stream overflows. What will happen when this land is built on?

Where will the excess water go? Where will the water from the development go? It will cause serious flooding in the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

4) I object to the development in areas of flooding. Garlick's Arch is in such an area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10175  Respondent: 10844609 / Sam Critchlow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6382  Respondent: 10845377 / Natasha Lock  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**FLOODING**

Being a resident of Heatherdene, West Horsley, our gardens flood every winter and whenever there is heavy rain

The field behind our house designated “Land near to Horsley Station and next to the railway” has been earmarked in the draft local plan for one hundred houses. A large percentage of this land is FLOOD ZONE 3. During the last winter this field was on Amber alert (imminent major flooding).

How can it be possible to consider a piece of land that floods all the surrounding gardens and floods that section of Ockham Road North with horrendous surface water? Commuters are constantly soaked as they walk along The Ockham Road towards the village by overflowing drains every time there is rain.

**The proposed entrance** is too near the Railway arch on Ockham rd north, where lorries travel frequently into the middle of the road to make sure the clear the underside of the bridge.

It is an accident waiting to happen, in the truest sense!

Recently in Fetcham, a development was built on a site that floods. Even though, specialist flood resistant foundations and drainage were installed, the site flooded, causing damage to the properties and rendering them unsellable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to policy P4 “Flood risk and water source protection zones” on the grounds that:

1.2 Urban development on existing hardstanding would not create additional flood risk, especially where there is scope for improved flood resistance measures to be included in the design. Sites such as Woodbridge Meadows Industrial Estate and the Arriva bus depot, on the River Wey bank, are potential high-value brownfield sites that would not be available for housing if this policy is implemented. It is not the footprint of existing buildings that should limit future development, but the extent of existing hardstanding. Tarmac and concrete do not act as functional floodplain, and some land with hard standing close to the river, within the town centre and within easy walking distance of the railway station, provides an excellent opportunity for real urban regeneration that could protect the surrounding countryside.

1.3 This policy should not be used as a convenient excuse not to build on the extensive area of brownfield sites between the station and Ladymead. Any new development in this area could easily be built on stilts with flood resistant ground floor parking in areas that are identified as high flood risk. This area has been built over successfully over the last 50 years. This must continue.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/7172  Respondent: 10854113 / Sarah Pickering  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

WE OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2168  Respondent: 10855553 / Emma Tallick  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

4. I object to development in areas which are at risk of flooding (Policy P4)

The Plan does not take adequate account of flood risk as required by National Planning Policy.

The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment. This area has flooded many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<table>
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<tr>
<th>Comment ID: PSLPP16/14643</th>
<th>Respondent: 10857249 / Alice Pashley</th>
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<td>The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.</td>
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<th>Respondent: 10857889 / William Kyte OBE</th>
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<td>Policy P4: Flood risk and water source protection zones</td>
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<tr>
<td>I OBJECT to this policy.</td>
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<td>There are aspects of this policy which are acceptable; it is sensible to protect groundwater source protection zones, provided that the maps are accurate.</td>
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<td>More attention needs to be given to adaptation measures.</td>
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<td>Areas subject to severe flood risk could be used as public open green space.</td>
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</table>
The changes essentially preclude building in these brownfield areas. Suitable designs can protect against flood risk and free up land for suitable development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/11656  **Respondent:** 10858753 / Carole Warren  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the local plan as many of the proposed sites are in areas at risk of flooding

Insufficient accounting of flood risk has been taken, a number of the sites are on or near flood planes, and have been classified by the Environment Agency as at High Risk of Flooding.

One site - Waterloo Farm - local to our address, has its paddock regularly under water after heavy rainfall, thus are not suitable for housing development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/18594  **Respondent:** 10858977 / Angela Otterson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to policy P4 Flood risk and water source protection zones

Urban development on existing hardstanding would not create additional flood risk, especially where there is scope for improved flood resistance measures to be included in the design. Sites such as Woodbridge Meadows Industrial Estate and the Arriva bus depot, on the River Wey bank, are potential high-value brownfield sites that would not be available for housing if this policy is implemented. It is not the footprint of existing buildings that should limit future development, but the extent of existing hardstanding. Tarmac and concrete do not act as functional floodplain, and some land with hard standing close to the river, within the town centre and within easy walking distance of the railway station, provides an excellent opportunity for real urban regeneration that could protect the surrounding countryside.

I strongly believe that this policy should not be used as a convenient excuse not to build on the extensive area of brownfield sites between the station and Ladymead. Any new development in this area could easily be built on stilts with flood resistant ground floor parking in areas that are identified as high flood risk. This area has been built over successfully over the last 50 years. We do not need to stop now.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/16015  **Respondent:** 10859553 / MARK Curtis  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to policy P4 Flood risk and water source protection zones

Urban development on existing hardstanding would not create additional flood risk, especially where there is scope for improved flood resistance measures to be included in the design. Sites such as Woodbridge Meadows Industrial Estate and the Arriva bus depot, on the River Wey bank, are potential high-value brownfield sites that would not be available for housing if this policy is implemented. It is not the footprint of existing buildings that should limit future development, but the extent of existing hardstanding. Tarmac and concrete do not act as functional floodplain, and some land with hard standing close to the river, within the town centre and within easy walking distance of the railway station, provides an excellent opportunity for real urban regeneration that could protect the surrounding countryside.

I strongly believe that this policy should not be used as a convenient excuse not to build on the extensive area of brownfield sites between the station and Ladymead. Any new development in this area could easily be built on stilts with flood resistant ground floor parking in areas that are identified as high flood risk. This area has been built over successfully over the last 50 years. We do not need to stop now.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
POLICY P4 FLOOD RISK

I object to policy P4 Flood risk and water source protection zones

Urban development on existing hardstanding would not create additional flood risk, especially where there is scope for improved flood resistance measures to be included in the design. Sites such as Woodbridge Meadows Industrial Estate and the Arriva bus depot, on the River Wey bank, are potential high-value brownfield sites that would not be available for housing if this policy is implemented. It is not the footprint of existing buildings that should limit future development, but the extent of existing hardstanding. Tarmac and concrete do not act as functional floodplain, and some land with hard standing close to the river, within the town centre and within easy walking distance of the railway station, provides an excellent opportunity for real urban regeneration that could protect the surrounding countryside.

I strongly believe that this policy should not be used as a convenient excuse not to build on the extensive area of brownfield sites between the station and Ladymead. Any new development in this area could easily be built on stilts with flood resistant ground floor parking in areas that are identified as high flood risk. This area has been built over successfully over the last 50 years. We do not need to stop now.

I do not support building directly on (as opposed to over) flood plain as the land is effectively a soak away, but intelligent architecture has been dealing with this problem for many decades in other parts of the UK and the globe.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5378  Respondent: 10872001 / Allanah Morris  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ) , is Sound? ( ) , is Legally Compliant? ( )

West Horsley East lane has a problem with flooding. This is a common event with a heavy down pour and also effects gardens and patio area's. If the local fields are built on this will increase the problem.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18480  Respondent: 10877025 / Maureen Stephens  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ) , is Sound? ( ) , is Legally Compliant? ( )

I object to development in areas at risk of flooding (Policy P4)

The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3704  Respondent: 10877313 / Millie Lipscombe  Agent: 

1. **Ditches Must be Maintained**

Full and proper provision must be made to avoid flooding, including possibly for the County Council to take over private ditches when land rights are sold off. It only takes one landowner/householder not to maintain their ditch but it affects all other properties along the way.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/11002  **Respondent:** 10878977 / Lisbet Hjort Jensen  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding.

Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/5221  **Respondent:** 10881569 / Nicola Douet  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Drainage, sewers, etc.:**
A number of areas in West Horsley are subject to frequent flooding; for example The Street near the railway bridge is very susceptible to flooding and on occasions last winter even the school buses could not get through. East Lane is subject to flooding where it abuts site A41. With the removal of the open field to soak up rain fall, this will only run-off onto East Lane causing more serious flooding on the road surface. This risk will increase if the vast amount of building proposed goes ahead and natural drainage is concreted over. No detail on waste water infrastructure in West Horsley has been found in any of the Local Plan documents.

Thames Water have commented that the current waste water network in this area is unlikely to be able to support the demand anticipated from this development. Drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. The Draft Guildford Borough Infrastructure Delivery Plan 2016 also identifies a significant Surface Water Flooding hotspot in and around West Horsley. Without the preparation of a drainage strategy to determine the exact impact on the infrastructure and the significance of the infrastructure to support the development, the deliverability of the proposed housing development is unclear.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/18199  **Respondent:** 10883201 / Danny McHugh  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( )  **is Sound?** ( )  **is Legally Compliant?** ( )

I OBJECT to development in areas which are at risk of flooding (Policy P4)

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The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/1099  **Respondent:** 10884993 / Dave Fassom  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( )  **is Sound?** ( )  **is Legally Compliant?** ( )
1. **OBJECT** to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/6844  **Respondent:** 10889985 / Ruth Macdonald  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/13491  **Respondent:** 10890177 / Cheryl Burnside  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
**POLICY P4**

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment. This area has flooded many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/7109  **Respondent:** 10896065 / Georgia Bean  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Flooding: I strongly object to the new draft plan in respect of flooding. The site behind Ockham Road North in East Horsley is partially a level 3 flood risk area and as local residents we are well aware of how much standing water there is in our gardens after rainfall. In fact, my dad's car was “written off” due to water damage at the A3 roundabout at Ripley in 2013 due to flooding. Building on such land will only exacerbate the problem. Our drains can’t cope now causing chaos on our local roads during heavy rainfall.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/1325  **Respondent:** 10897217 / Warren Hogben  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

2. I object to development in areas which are at risk of flooding (Policy P4)

The Plan does not take adequate account of flood risk as required by National Planning Policy.

The site at Garlick's Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council's own assessment. This area has flooded many times in recent years and therefore the Council's assessment is not good enough to be included in the plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/2792  **Respondent:** 10898721 / J Hawkins  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT in general that priority is not on using brownfield sites, despite this being the stated aim in the Plan, but the
insidious eating into the Green Belt and thus increasing the risk of flooding again despite your statement that flooding
defences will be put in place. There is an increased risk of flooding now and in the future with change in patterns of
rainfall. If fewer large expensive homes were built instead of smaller, more affordable housing less land would be
required and more people could be housed per acre.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10846  Respondent: 10899233 / Frederick Hookins  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is
designated as flood zone 3 by the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5944  Respondent: 10901761 / L Pike  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Normandy has a serious problem with flooding from surface water as well as the sewage system which is very inadequate
at times of high rainfall.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9142  Respondent: 10906145 / Joe Gervasio  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

1. I object to development in areas which are at risk of flooding (Policy P4)

The Plan does not take adequate account of flood risk as required by National Planning Policy.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a
river (meaning that it has a 1 in 100 or greater chance of flooding each year – this is the highest risk category). Despite
this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 (meaning having between a 1%
and 0.1% annual probability of river flooding); that is, one tenth of the probability assessed by the Environment Agency!
This site often floods during the winter months and has flooded as recently as this summer 2016. Clearly the Council’s SFRA is not fit for purpose and so invalidates the local plan for such sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/18126</th>
<th>Respondent: 10910273 / Lynda M Williams</th>
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We support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/10111</th>
<th>Respondent: 10910369 / Karen Doyle</th>
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I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/12149</th>
<th>Respondent: 10910753 / Heather Thompson</th>
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The Plan does not take adequate account of flood risk as required by National Planning Policy. The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment. This area has flooded many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan.

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</td>
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<tr>
<td>Comment ID: PSLPP16/15507</td>
<td>Respondent: 10911425 / Andrew Gray</td>
<td>Agent:</td>
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</table>

7. I object to development in areas which are at risk of flooding (Policy P4)

The Plan does not take adequate account of flood risk as required by National Planning Policy.

The site at Garlick’s Arch (A43) is classified by the Environment Agency as a Zone3 flood risk which is higher risk than the Council’s own assessment!!

This area has flooded many times in recent years and in fact in the recent heavy rain in June the land stream over flow and the land flooded for 3 days, (photographic evidence available) therefore the Council’s assessment is inadequate and should not to be included in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/7212</th>
<th>Respondent: 10915361 / Judy Young</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</td>
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POLICY P4 – Flood risk and water source protection zones

I OBJECT to this policy as it precludes the development of brown field sites where there would be capacity for improved flood resistance enabling development and urban regeneration that would in turn protect the surrounding countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<th>Comment ID: PSLPP16/6729</th>
<th>Respondent: 10918305 / Susan Butler</th>
<th>Agent:</th>
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<tr>
<th>Comment ID: PSLPP16/10103</th>
<th>Respondent: 10920001 / Jeff Doyle</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
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<td>I strongly object to the new draft plan in respect of flooding. The site behind Ockham Road North in East Horsley is partially a level 3 flood risk area and as local residents we are well aware of how much standing water there is in our gardens after rainfall. In fact, my husband’s car was “written off” due to water damage at the A3 roundabout at Ripley in 2013 due to flooding. Building on such land will only exacerbate the problem. Our drains can’t cope now causing chaos on our local roads during heavy rainfall.</td>
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<tr>
<th>Comment ID: PSLPP16/12066</th>
<th>Respondent: 10922177 / Paul Knight</th>
<th>Agent:</th>
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|  |  |  |
The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT TO POLICY P4 (FLOOD RISK AND WATER PROTECTION):

- Limits development of urban, brownfield, hardstanding sites, pushing development unnecessarily into the countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

1. I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Flooding...the heavy rain we have had this summer demonstrates that the drainage in the areas is already not coping. To build houses in an area of level 3 flood risk, behind Ockham Road North, is ridiculous.

I object to development in areas which are at risk of flooding (policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

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<tr>
<th>Comment ID: PSLPP16/9275</th>
<th>Respondent: 10943457 / Henry Benzikie</th>
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<th>Comment ID: PSLPP16/9276</th>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3286  Respondent: 10944513 / Amber Ellis  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Attached documents:

Comment ID: PSLPP16/16473  Respondent: 10945057 / Margaret Field  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency
Flooding to the local area has not been addressed and would get progressively worse with further development.

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

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It is subject to frequent flooding and is currently a flood zone 2 allocation

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15795  Respondent: 10953249 / Charlotte Ladd  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8809  Respondent: 10953921 / Alan Knox  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to development in areas at risk of flooding (Policy P4)

The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council’s own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/16733  Respondent: 10956161 / Pauline McCallister  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

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I object to development in areas which are at risk of flooding (Policy P4)
The Plan does not take adequate account of flood risk as required by National Planning Policy.

The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment. This area has flooded many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan.

How can the Council’s flood risk be low than the Environment agency’s? We seen yearly flooding in the Garlick’s Arch area! We leave near there.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4643  Respondent: 10957025 / Pauline Masters  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY P4

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6650  Respondent: 10958753 / Ingrid Molossi  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
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Attached documents:

Comment ID: PSLPP16/18398  Respondent: 10959265 / Inger & Ron Ward  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

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Attached documents:

Comment ID: PSLPP16/10479  Respondent: 10960033 / Lucinda Kalupka  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12280  Respondent: 10962689 / Martin Ladd  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

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National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

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The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to development in areas which are at risk of flooding (Policy P4)

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I strongly object to the local plan on the grounds that increased development will result in the destruction of natural drainage, resulting in increased run-off over developed areas which will exacerbate flooding in these areas. Flooding is already a problem and to increase the occurrence and severity of flooding in these areas would be immoral.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to development in areas which are at risk of flooding (Policy P4)

The Plan does not take adequate account of flood risk as required by National Planning Policy. The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment. This area has flooded many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
design. Sites such as the Arriva bus depot, on the River Wey bank, are potential high value brownfield land which may not be used for housing because of this policy. The footprint of existing buildings should not be the limit of future development, but the extent of existing hard standing. Tarmac and concrete do not act as functional floodplain, but some land with hard standing close to the river, within the town centre and within easy walking distance of the train station, provides an exciting opportunity for real urban regeneration which could protect the surrounding countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4986  Respondent: 10986689 / Richard Harris  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9530  Respondent: 10987841 / Marion Bastable  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

** I object to development in areas at risk of flooding (Policy P4) The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council’s own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8323  Respondent: 10990145 / Anne Lee  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY P4

I OBJECT to development in areas which are at risk of flooding (Policy P4)

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Respondent: 10992417 / Philip Erhardt</th>
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I object to development in areas which are at risk of flooding (policy P4) The East Clandon Stream floods enough as it is without new development nearby.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/7376</th>
<th>Respondent: 10992833 / Amanda Verny White</th>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/7000</th>
<th>Respondent: 10997121 / Rob Curling</th>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13894  Respondent: 11001249 / Lesley Milton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The site behind Ockham Road North in East Horsley is partially a level 3 flood risk area, and local residents are well aware of how much standing water there is in their gardens after rain. Building on such land will only exacerbate the problem. Other areas of the Horsleys are also flooded when it rains because the drains are inadequate. Substantially more houses will exacerbate the problem but no attention has been paid to drainage in the local plan.

- Schools and medical facilities II

Local schools and medical facilities are already at capacity.

No extra school places are planned in the Horsleys and the school places proposed at Wisley Airfield will not be planned until many years into the project. 2600 new houses could easily mean 2600 children looking for school place!

I trust the Council will review its Local Plan basing it on a model for projected population growth which is available for inspection and with more attention paid to the infrastructure constraints and to the use of brown field sites rather than destroy our precious Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10418  Respondent: 11007073 / Gyles McIver  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to development in areas which are at risk of flooding (Policy P4)

The Plan does not take adequate account of flood risk as required by National Planning Policy.
The site at Garlick's Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council's own assessment. This area has flooded on numerous occasions in recent years and therefore the Council's assessment is not sufficient to be included in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPP16/15285  Respondent: 11007393 / James Culmer  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10444  Respondent: 11007425 / Kate McIver  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

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Attached documents:

Comment ID: PSLPP16/2450  Respondent: 11014881 / Linda Peters-Smith  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy P4 - Flood Risk and Water Source Protection Zones

I Object.

Urban development of existing hard standing wouldn't create additional flood risk if improved flood prevention measures were included when it is being designed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2045  Respondent: 11023585 / Jean Walker  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

10. DRAINS, WATER SUPPLY, FLOOD RISK, CONGESTION

Our drains, our water supply, our medical facilities and our roads cannot cope with the proposed number of new homes. Building this number of homes will lead to flood risk here and downstream (along the Wey and Thames). The planned development on Green Belt is therefore unsustainable.

In conclusion, I must ask you to revise the housing number, and to amend the Local Plan to utilise brownfield land rather than green field sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

4.) Development in areas which are at risk of flooding (Policy P4)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Flooding:
The site behind Ockham Road North in East Horsley is partially a level 3 flood risk area, and local residents (myself and my neighbours included, who live the other side of the railway tracks) are well aware of how much standing water there is in their/our gardens after rain. Building on such land will only exacerbate the problem. We already know what happens to local roads when it rains – the drains can’t cope. I object to more building causing flooding

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object on the basis of how this is being applied- In the surface water hotspot map in the Local Plan, the area of all developments in West and East Horsley and in a hotspot area. How can the application of a sensible policy be to build houses in a surface water flooding hot spot?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to policy P4 Flood risk and water source protection zones Urban development on existing hardstanding would not create additional flood risk, especially where there is scope for improved flood resistance measures to be included in the design. Sites such as Woodbridge Meadows Industrial Estate and the Arriva bus depot, on the River Wey bank, are
potential high-value brownfield sites that would not be available for housing if this policy is implemented. It is not the footprint of existing buildings that should limit future development, but the extent of existing hardstanding. Tarmac and concrete do not act as functional floodplain, and some land with hard standing close to the river, within the town centre and within easy walking distance of the railway station, provides an excellent opportunity for real urban regeneration that could protect the surrounding countryside. I strongly believe that this policy should not be used as a convenient excuse not to build on the extensive area of brownfield sites between the station and Ladymead. Any new development in this area could easily be built on stilts with flood resistant ground floor parking in areas that are identified as high flood risk. This area has been built over successfully over the last 50 years. We do not need to stop now.

I do not support building directly on (as opposed to over) flood plain as the land is effectively a soak away, but intelligent architecture has been dealing with this problem for many decades in other parts of the UK and the globe.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14585  Respondent: 11036801 / Judith Mercer  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to POLICY P4(Flood risk and Water Protection)

If this policy is implemented it would restrict essential urban redevelopment and use of brownfield and hard standing sites in Guildford and its urban district, thereby putting more emphasis on developing in the countryside. The Council must get its priority right. It must implement policy to run through the whole of the plan to save countryside and Green Belt.

There is no additional flood risk where existing hardstanding is developed in urban areas.

There would be an opportunity to provide improved flood resistance to regenerated areas such as on the River Wey bank where a large amount of brownfield land is available for housing, if this policy was revised.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3720  Respondent: 11037921 / C. H. Morris  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Fifthly, we are already subject to a degree of flooding following periods of rain and I am most concerned that further building will create serious flood risk for properties in these villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10139  Respondent: 11039681 / Bruce Jeffreson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6430  Respondent: 11040609 / Simon Long  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7328  Respondent: 11041121 / Catherine Dean  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to development in areas which are at risk of flooding (Policy P4). National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9444  Respondent: 11041153 / Melissa Ransome  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the development to areas that are at risk of flooding (Policy P4). The plan does not take into consideration any flood risks as required by the National Planning Policy. Garlicks Arch (A43) is given by the Environment Agency as an area of having a higher risk of flooding than the Council's own evaluation of the area. This area has flooded numerous times in past years and so the Council's evaluation of this area is not adequate for it to be included in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/1899  **Respondent:** 11041281 / Chris Harlow  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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**Comment ID:** PSLPP16/11547  **Respondent:** 11042433 / Sam Thompson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

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Large parts of Ripley and Send are in or next to flood zones, further building in the area would increase flood risks due to the reduction in run off areas and fields to absorb water.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12706  **Respondent:** 11042433 / Sam Thompson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

**Do you consider this section of the document; complies with the Duty to Cooperate?**( ), **is Sound?**( ), **is Legally Compliant?**( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5497  **Respondent:** 11043553 / Geraldine Banks  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Comment ID:</th>
<th>PSLPP16/4867</th>
<th>Respondent:</th>
<th>11047329 / Hazel Corstin</th>
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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
### Comment ID: PSLPP16/12831  Respondent: 11053825 / Claire Owen  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

### Comment ID: pslp171/984  Respondent: 11053825 / Claire Owen  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P4

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<th>Comment ID: PSLPP16/17419</th>
<th>Respondent: 11063233 / David Ebdon</th>
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<tr>
<td>I strongly object to development in areas which are at risk of flooding (Policy P4)</td>
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<tr>
<td>The Plan does not take adequate account of flood risk as required by National Planning Policy.</td>
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<tr>
<td>The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment. This area has flooded many times and people have identified that under your own assessment criteria Garlicks Arch is not good enough to be included in the plan. I have seen some of the flooding around Burnt Common/Garlicks Arch and it would need to be dealt with IF this Plan were to go ahead, which I sincerely hope it will not.</td>
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<tr>
<td>Our drains (both foul and surface water), our water supply, our medical facilities, our schools and our roads cannot cope with our existing population let alone the proposed increase which would follow the planned number of new homes. Building this number of homes will lead to greater flood risk in Horsley and downstream (along the Wey and Thames). Ripley Lane is often flooded after a few hours of rain and impassable in a car near Jury’s Farm as are other areas adjacent to your proposed sites.</td>
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<tr>
<td>POLICY P4 (FLOOD RISK AND WATER PROTECTION) – Object because it limits stops hardstanding sites in town being developed.</td>
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the large amount of Green Belt land within Guildford Borough, which limits the amount of available land for
development (see below)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

1. POLICY P4

I OBJECT to development in areas that are at risk of flooding (Policy P4)

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The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17458  Respondent: 11079361 / Alan Dillon  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Due account should be taken of increased potential flooding risks, taking account of predicted more extreme weather arising from continued global warming.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14320  Respondent: 11080097 / David & Julia Hunt  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to policy P4 Flood risk and water source protection zones Urban development on existing hardstanding would not create additional flood risk, especially where there is scope for improved flood resistance measures to be included in the design. Sites such as Woodbridge Meadows Industrial Estate and the Arriva bus depot, on the River Wey bank, are potential high-value brownfield sites that would not be available for housing if this policy is implemented. It is not the footprint of existing buildings that should limit future development, but the extent of existing hardstanding. Tarmac and concrete do not act as functional floodplain, and some land with hard standing close to the river, within the town centre and within easy walking distance of the railway station, provides an excellent opportunity for real urban regeneration that could protect the surrounding countryside.

I strongly believe that this policy should not be used as a convenient excuse not to build on the extensive area of brownfield sites between the station and Ladymead. Any new development in this area could easily be built on stilts with flood resistant ground floor parking in areas that are identified as high flood risk. This area has been built over successfully over the last 50 years. We do not need to stop now.

I do not support building directly on (as opposed to over) flood plain as the land is effectively a soak away, but intelligent architecture has been dealing with this problem for many decades in other parts of the UK and the globe.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Comment ID: PSLPP16/15858  Respondent: 11098369 / Neil & Nicki Covington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

WE OBJECT to development in areas which are at risk of flooding (Policy P4).

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well we are aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Comment ID: PSLPP16/6834  Respondent: 11114721 / Elizabeth Wilcockson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

4. I OBJECT to development in areas which are at risk of flooding (Policy P4)
National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/14040  **Respondent:** 11136993 / Elliot Machin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Flooding is already an issue in Send Marsh.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/15840  **Respondent:** 11150913 / Sarah Marshall  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/1127</th>
<th>Respondent: 11151617 / Nigel Tallick</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</td>
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<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), <strong>is Sound?</strong> ( ), <strong>is Legally Compliant?</strong> ( )</td>
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</tbody>
</table>

1. **I object to development in areas which are at risk of flooding (Policy P4)**

The Plan does not take adequate account of flood risk as required by National Planning Policy.

The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment. This area has flooded many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/2013</th>
<th>Respondent: 11160001 / Andy Freebody</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</td>
<td></td>
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<tr>
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1. **I OBJECT to development in areas which are at risk of flooding (Policy P4)**

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter...
months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2541  Respondent: 11199841 / Woodstreet Village Association (Neville Byran)  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Wording amendments are not specific. We need to manage implications of changes and building on flooding. Specifically we mention site A26 (Blackwell Farm), as the runoff water courses have been identified as affecting Wood Street Village, Fairlands, etc... as well as environmentally protected areas (covered by GBC and SCC policy), such as the Thames Heath Basin SPA, Whitmoor Common, and wetlands downstream in the river Wey.


What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/28  Respondent: 15067425 / Anita Fairbairn  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

I object to the plan for Garlick's copse. By destroying the wood and building on the fields I believe a flood risk for the residents of Send Marsh will be created caused by run off.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/36  Respondent: 15081921 / Robert Neal  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

I OBJECT. The plan acknowledges that the area lacks sufficient ground water supply yet continues to propose developments in Green Belt without due consideration for sustainable supplies of fresh water.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
15 POLICY P4 FLOOD RISK

15.1 I object to policy P4 Flood risk and water source protection zones

15.2 Urban development on existing hardstanding would not create additional flood risk, especially where there is scope for improved flood resistance measures to be included in the design. Sites such as Woodbridge Meadows Industrial Estate and the Arriva bus depot, on the River Wey bank, are potential high-value brownfield sites that would not be available for housing if this policy is implemented. It is not the footprint of existing buildings that should limit future development, but the extent of existing hardstanding. Tarmac and concrete do not act as functional floodplain, and some land with hard standing close to the river, within the town centre and within easy walking distance of the railway station, provides an excellent opportunity for real urban regeneration that could protect the surrounding countryside.

15.3 I strongly believe that this policy should not be used as a convenient excuse not to build on the extensive area of brownfield sites between the station and Ladymead. Any new development in this area could easily be built on stilts with flood resistant ground floor parking in areas that are identified as high flood risk. This area has been built over successfully over the last 50 years. We do not need to stop now.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Surface Water Flooding

I am acutely aware of Surface Water Flooding. When we moved into West Horsley in 2011 we were then unaware of any flooding risk, after all where we live in East Lane there are no rivers.

Since moving to East Lane (less than 5 years ago), East Lane has flooded several dozen times during heavy rainfall, through the failure of systems to take surface water away. The road completely fills. Because of the upward slope of the pavement at our house it has not yet gone over the edge into our drive. If it did we would be badly flooded as our drive slopes down to the house by several feet so we could be under many feet of water if this happened. We have come close so many times.

This is a very serious problem in the Horsleys. It is not just our road. We have had a car written off due to local surface water flooding in West Horsley and have had to be rescued by the Fire Brigade. Not a good record for less than 5 years here!

Clearly the additional plots in West Horsley will have a huge impact on this situation and each one has surface water flooding identified as an issue in the plan.

However, to my amazement, when looking at Appendix C under Surface Water Flooding there is not a single proposal for West Horsley. That is mind boggling!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/309  Respondent: 15131841 / David Wackett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Our sewers are already failing to cope with the amount of effluent flushed into them and regular flood our road when we get heavy rain. The treatment plant at Slyfield is still years away from being replaced.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/353  Respondent: 15133377 / Joyce Vincente  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Flooding: The site behind Ockham Road North in East Horsley is partially a level 3 flood risk area, and local residents are well aware of how much standing water there is in their gardens after rain. Building on such land will only exacerbate the problem. We already know what happens to local roads when it rains – the drains can’t cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Flooding At the moment the area has a real problem with flooding - not just in winter but all the year round. The drainage systems in the villages already cannot cope with heavy rain - building more properties will only exacerbate the problem.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Flooding: The site behind Ockham Road North in East Horsley is partially a level 3 flood risk area, and local residents are well aware of how much standing water there is in their gardens after rain. Building on such land will only exacerbate the problem. We already know what happens to local roads when it rains – the drains can’t cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

This site maybe prone to flooding.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
This site may be prone to flooding.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/589  **Respondent:** 15145313 / T G Wells  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to these proposals because I cannot believe that sufficient weight has been given to recent historical flooding in these areas resulting in ingress to properties.

We are told by experts to expect climate change to bring more extreme episodes of weather and yet you are proposing to concrete over large tracts of useful Green Belt allowing more water to be delivered more swiftly to streams and rivers, with resulting overflows and flooding.

I object to these proposals because I believe Government Policy is that 'proven need' is required to take land out of the Green Belt. I do not believe that this 'proven need' has been achieved, and these proposals constitute over development on a grand scale.

I object to these proposals because I do not believe sufficient consideration has been given to resulting traffic flows and consequential pollution of the atmosphere with gridlocked heavy goods vehicles, apart from the general chaos at busy times.

Please note that I wish my comments to be seen by the Inspector.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/617  **Respondent:** 15147329 / Brenda Holliday  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

In regard to the Local Plan for Normandy, I would like to draw your attention to a few things here in our village.

I walk my dog Lucy over the fields where the proposed 1,150-houses, school and shops might be built. The fields are under water for 8-months of the years. The farmer that looks after these fields has dug-out a ditch 9ft deep and 100yds long in an attempt to drain his fields but it hasn't worked. If all these houses were to be built the water run-off would flood the sewage system in Glaziers Lane. The houses all ready have problems with flood water backing up into their toilets, so you see more rain water would perpetuate this problem even more. This awful situation is a genuine concern to me.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
**I object to development in areas at risk of flooding (Policy P4)**

The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1.) Development in areas which are at risk of flooding . (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/778  Respondent: 15157601 / Barbara Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to development in areas which are at risk of flooding (Policy P4)

The Plan does not take adequate account of flood risk as required by National Planning Policy.

The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment. This area has flooded many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15538  Respondent: 15172641 / Michael Heard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to development in areas which are at risk of flooding (Policy P4)

The Plan does not take adequate account of flood risk. It appears that the Council’s assessment of the flooding risk is flawed.

The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s assessment.

This area has flooded many times in recent years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1059  Respondent: 15174145 / Kathleen Mylet  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

4) I object to building in areas where there is a risk of flooding. (P4)
The land at Garlick’s Arch has been classified by the Environment Agency as being at risk of flooding.

The field at Oldlands farm is often under water.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

1. I object to development in areas which are at risk of flooding (Policy P4)

The Plan does not take adequate account of flood risk as required by National Planning Policy.

The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment. This area has flooded many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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The site at Garlick's Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council's own assessment. This area has flooded many times in recent years and therefore the Council's assessment is not good enough to be included in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to development in areas which are at risk of flooding (Policy P4)

The Plan does not take adequate account of flood risk as required by National Planning Policy. The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment. This area has flooded many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1308  Respondent: 15220097 / Douglas Barr Trudy Amos  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. We object to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1384  Respondent: 15227585 / Kelly Bartlett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/13739  Respondent: 15227905 / Nigel Alexander  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY P4 (FLOOD RISK AND WATER PROTECTION):
• Limits development of urban, brownfield, hardstanding sites, pushing development unnecessarily into the countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1468  Respondent: 15233889 / Claire Sallows  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Thirdly, I object to development in areas which are at risk of flooding (Policy P4).

I believe the Plan does not take adequate account of flood risk as stipulated in the National Planning Policy.

The flood classifications of Garlick’s Arch (A43) by the Environment Agency and the Council are different. As a resident of 20 years I have seen this area flooded many times and believe development will have a huge potential impact on the flood plains between Woking and Send, just creating a new problem in a slightly different place that will impact new and existing development for miles around. I see no evidence of this being taken into account.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1485  Respondent: 15234177 / Brianne Vally  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to development in areas which are at risk of flooding. I understand that the site at garlick's arch is classified by the EA as being at higher risk than the council's own assessment. The environment agency has previously stated that one in six homes in England is currently at risk of flooding with 2.4 million threatened by rivers and seas and a further 2.8 million at risk from surface water flooding so let's not add to these already worrying numbers. Under the Civil Contingencies act 2004 Guildford Borough Council has a duty to assess the risk of emergencies occurring and use this to inform contingency planning so why make the matter worse by building in a sensible area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

**Comment ID:** PSLPP16/1488  **Respondent:** 15234273 / Martin Jones  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

4. I object to development in areas which are at risk of flooding. I understand that the site at Garlick's Arch is classified by the EA as being at higher risk than the council's own assessment. The environment agency has previously stated that one in six homes in England is currently at risk of flooding with 2.4 million threatened by rivers and seas and a further 2.8 million at risk from surface water flooding so let's not add to these already worrying numbers. Under the Civil Contingencies act 2004 Guildford Borough Council has a duty to assess the risk of emergencies occurring and use this to inform contingency planning so why make the matter worth by building in a sensible area.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

**Comment ID:** PSLPP16/1618  **Respondent:** 15240161 / R O Moore  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

4. Development in areas which are at risk of flooding (Policy P4)

The Plan does not take adequate account of flood risk as required by National Planning Policy. The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

**Comment ID:** PSLPP16/1736  **Respondent:** 15244641 / Wesley Raynbird-Tilbury  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

POLICY P4 - Flood risk and water source protection zones

I OBJECT . Urban development on existing hardstanding would not create additional flood risk, especially where there is scope for improved flood resistance measures to be included in the design. Sites such as the Arriva bus depot, on the River Wey bank, are potential high-value brownfield sites that would not be available for housing if this policy is implemented. It is not the footprint of existing buildings that should limit future development, but the extent of existing hardstanding. Tarmac and concrete do not act as functional floodplain, and some land with hard standing close to the river, within the town centre and within easy walking distance of the railway station, provides an excellent opportunity for real urban regeneration that could protect the surrounding countryside.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1804  Respondent: 15247265 / Aileen Aitcheson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY P4: Flooding...
I support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1828  Respondent: 15247745 / Brian Aitcheson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY P4: Flooding...
I support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1863  Respondent: 15248481 / Jamie McCallister  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

4. I object to development in areas which are at risk of flooding (Policy P4)
The Plan does not take adequate account of flood risk as required by National Planning Policy.

The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment. This area has flooded many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan.

How can the Council’s flood risk be low than the Environment agency’s? We seen yearly flooding in the Garlick’s Arch area! We leave near there.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough's identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick's Arch (A43) is identified on the Environment Agency's flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council's SFRA as a Flood Zone 2 - having between a 1% and 0.1 % annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be recommissioned to accurately reflect the actual flooding risks of each site.

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<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/1931</th>
<th>Respondent: 15254113 / R Orchard</th>
<th>Agent:</th>
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<tr>
<th>Comment ID: PSLPP16/13701</th>
<th>Respondent: 15254337 / Ben Warwick</th>
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** I object to development in areas at risk of flooding (Policy P4)

The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years

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<tr>
<th>Comment ID: PSLPP16/1945</th>
<th>Respondent: 15254785 / M.D. Vickers</th>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1967  Respondent: 15255553 / J.A. Vickers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1983  Respondent: 15256705 / R.V. Vickers  Agent:
1. I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPP16/2033  **Respondent:** 15260737 / P Hayman  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I have lived for over 40 years at this address, the traffic just continues to increase, as does flooding from surface water. When it rains, due to areas surrounding me, ditches have been infilled and my back gardens flood. How can the existing water network cope with the addition of so many more houses?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/2060  **Respondent:** 15263073 / James Walker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

4.1 OBJECT to development in areas which are at risk of flooding (Policy P4)

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/2079  **Respondent:** 15263905 / Philip Walker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2093  Respondent:  15264001 / Robert Peake  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate?  (), is Sound?  (), is Legally Compliant?  ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7478  Respondent:  15264065 / Roshan Bailey  Agent:
I believe this policy should be strengthened to require more explicitly that all development proposals should demonstrate how they will manage severe weather events and the impact of surface water on other properties, roads and footpaths. They need to be able to show that they have investigated and understood how local water flows change at such times. It is also important to ensure that the knock on effects of improvements in surface water management are considered e.g. there has recently been significant improvement work in the Beech Lane area of Normandy. This will put pressure on downstream areas which would have to be taken into account for any development in the area designated as A46 to ensure that the risks around Glaziers Lane and Elmgrove Lane are not increased during storms or persistent heavy rainfall.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to development in areas at risk of flooding (Policy P4)

The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2273  Respondent: 15275009 / Compton Parish Council (Fiona Curtis)  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We object to policy P4. Flood risk and water source protection zones. Urban development on existing hardstanding would not create additional flood risk, especially where there is scope for improved flood resistance measures to be included in the design. Sites such as Woodbridge Meadows Industrial Estate and the Arriva bus depot, on the River Wey bank, are potential high-value brownfield sites that would not be available for housing if this policy is implemented. It is not the footprint of existing buildings that should limit future development, but the extent of existing hardstanding. Tarmac and concrete do not act as functional floodplain, and some land with hard standing close to the river, within the town centre and within easy walking distance of the railway station, provides an excellent opportunity for real urban regeneration that could protect the surrounding countryside.

We strongly believe that this policy should not be used as a convenient excuse not to build on the extensive area of brownfield sites between the station and Ladymead. Any new development in this area could easily be built above flood resistant ground floor parking in areas that are identified as high flood risk. This area has been built over successfully over the last 50 years.

We do not support building directly on flood plain as the land is effectively a soak away, but intelligent architecture has been dealing with this problem for many decades in other parts of the UK and the globe.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11912  Respondent: 15275201 / Jennifer Morritt  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to development in areas which are at risk of flooding (Policy P4)

The Plan does not take adequate account of flood risk as required by National Planning Policy.

The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment. This area has flooded many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Parts of Normandy, especially at the southern edge of the proposed development and in the area next to the Hoe stream, are subject to severe flooding problems, and the associated release of sewage into people's properties and into the Hoe stream which would cut across the development. One property has already been flooded 5 times in the past year, and the Station Car Park is regularly flooded during the down pours which have been occurring regularly. The Hoe stream also floods, which affects Glaziers Lane at the bridge crossing the stream, and sewage has been released into it, causing a health hazard.

The proposed development area at present allows natural drainage through the soil and trees; if this area is concreted over, the resultant run off of surface water would overwhelm the present system, causing even more flooding in the local area. I am not convinced that an underground tank to take excess water and release it in a controlled fashion would be able to cope with the increased amount of water which forecasters say we must expect with climate warming.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/2559  **Respondent:** 15284993 / Samantha Thompson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/2574  **Respondent:** 15285121 / Audrey Boughton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

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I object to building in flood areas.

The Plan does not take adequate account of flood risk. The Environment Agency have assessed Garlick's Arch (A43) is as being in a higher risk of flooding than the Council's own assessment. As a local resident I know this area floods regularly and in fact even flooded this SUMMER! The council's assessment is not good enough to be included in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2703  Respondent: 15296545 / Catherine Lees  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object the development in areas which are at risk of flooding.

The Plan does not take adequate account of flood risk as required by National Planning Policy.

The site at Garlick's Arch (A43) is identified on the Environment Agency's flood map as being in a flood Zone 3 from a river (means that it has a 1 in 100 or greater chance of flooding each year - this is the highest risk category). Despite this flood risk, the site has been assessed as part of the Council's SFRA as a Flood Zone 2 (meaning having between a 1% and 0.1% annual probability of river flooding - that is one tenth of the probability assessed by the Environment Agency!).

This site often floods during the winter months and has flooded as recently as this summer 2016. Clearly the Council's SFRA is not fit for purpose and so invalidates the local plan for such sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2757  Respondent: 15298017 / Margaret Cousins  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.
The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to development in areas which are at risk of flooding (Policy P4)

The Plan does not take adequate account of flood risk as required by National Planning Policy.

The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment. This area has flooded many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to Policy P4 Flood risk and water source protection zones Urban development on existing hardstanding would not create additional flood risk, especially where there is scope for improved flood resistance measures to be included in the design. Sites such as Woodbridge Meadows Industrial Estate and the Arriva bus depot, on the River Wey bank, are potential high-value brownfield sites that would not be available for housing if this policy is implemented. It is not the footprint of existing buildings that should limit future development, but the extent of existing hardstanding. Tarmac and concrete do not act as functional floodplain, and some land with hard standing close to the river, within the town centre and within easy walking distance of the railway station, provides an excellent opportunity for real urban regeneration that could protect the surrounding countryside.

I strongly believe that this policy should not be used as a convenient excuse not to build on the extensive area of brownfield sites between the station and Ladymead. Any new development in this area could easily be built on stilts with flood resistant ground floor parking in areas that are identified as high flood risk. This area has been built over successfully over the last 50 years. We do not need to stop now.

I do not support building directly on (as opposed to over) flood plain as the land is effectively a soak away, but intelligent architecture has been dealing with this problem for many decades in other parts of the UK and the globe.
I object to all development in areas at risk from flooding.

Any development carried out in or around this area, will add to the flooding, which so often occurs in the Wey and Mid Thames Valleys and any additional large developments will just add to the misery for those who live in those areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

1. I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/2968  **Respondent:** 15304929 / Rosemary Wood  **Agent:**

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<thead>
<tr>
<th>Document:</th>
<th>Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</th>
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**I OBJECT** to development in areas which are at risk of flooding. National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough's identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding. The site at Garlick's Arch (A43) is identified on the Environment Agency's flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance offlooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council's SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site. 

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
1. I object to development in areas, which are at risk of flooding (Policy P4)

The Plan does not take adequate account of flood risk as required by National Planning Policy.

The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment. This area has flooded many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan. Just a few weeks ago the Portsmouth Road opposite the Garlick’s Arch site was flooded despite the improvements to the river that flows under the road. There are good reasons why I have to maintain a four foot deep ditch that runs alongside my house in Burnt Common Lane, building on the fields will just make the situation worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment. This area has flooded many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<th>Comment ID: PSLPP16/3078</th>
<th>Respondent: 15315009 / Edward Dennis</th>
<th>Agent:</th>
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<th>Comment ID: PSLPP16/3440</th>
<th>Respondent: 15320737 / Steven Brown</th>
<th>Agent:</th>
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<td>I object to POLICY P4 – Flood risk and water source protection zones</td>
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<td>• Inappropriately limits development of urban, brownfield, hardstanding sites, pushing development unnecessarily into the countryside.</td>
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<th>Comment ID: PSLPP16/3511</th>
<th>Respondent: 15321217 / Sally Rule</th>
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The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Councils’ own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3148  Respondent: 15323041 / Jane Doherty  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3174  Respondent: 15323841 / Claire Parker  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

4. I object to development in areas which are at risk of flooding (Policy P4)

The Plan does not take adequate account of flood risk as required by National Planning Policy.

The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment. This area has flooded many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3255  Respondent: 15326465 / James Parker  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

4. I object to development in areas which are at risk of flooding (Policy P4)

The Plan does not take adequate account of flood risk as required by National Planning Policy.
The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment. This area has flooded many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3310  Respondent: 15327905 / Julia Cook  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY P4 – Flood risk and water source protection zones

I OBJECT. Urban development on existing hardstanding would not create additional flood risk, especially where there is scope for improved flood resistance measures to be included in the design. Sites such as the Arriva bus depot, on the River Wey bank, are potential high-value brownfield sites that would not be available for housing if this policy is implemented. It is not the footprint of existing buildings that should limit future development, but the extent of existing hardstanding. Tarmac and concrete do not act as functional floodplain, and some land with hard standing close to the river, within the town centre and within easy walking distance of the railway station, provides an excellent opportunity for real urban regeneration that could protect the surrounding countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3364  Respondent: 15329441 / Suzie Powell-Cullingford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to Policy P4 development in areas at risk from flooding. As a resident of Kiln Lane, on the edge of site A43 Garlick’s Arch, I can categorically confirm that this site floods EVERY YEAR and not just during the winter months. The stream that runs through the middle of this site into the River Wey is categorised as Flood Zone 3 according to the Environment Agency flood map website. The soil is very heavy clay (Kiln Lane historically housed a brick kilns manufacturing business from locally sourced clay) which further adds to the flooding problems and the land remains water-logged for many weeks following any significant rainfall... GBC have assessed the site as predominantly zone 1, which is clearly inaccurate and therefore the SFRA cannot be deemed useable or fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7821  Respondent: 15329441 / Suzie Powell-Cullingford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
1. I object to Policy P4 development in areas at risk from flooding. As a resident of Kiln Lane, on the edge of site A43 Garlick's Arch, I can categorically confirm that this site floods EVERY YEAR and not just during the winter months. The stream that runs through the middle of this site into the River Wey is categorised as Flood Zone 3 according to the Environment Agency flood map website. The soil is very heavy clay (Kiln Lane historically housed a brick kilns manufacturing business from locally sourced clay) which further adds to the flooding problems and the land remains water-logged for many weeks following any significant rainfall. GBC have assessed the site as predominantly zone I, which is clearly inaccurate and therefore the SFRA cannot be deemed useable or fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3433  Respondent: 15340929 / Claire Smylie  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3604  Respondent: 15342401 / M.J. Harris  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to development in areas which are at risk of flooding
National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

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Knowing the area well, I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
**Comment ID:** PSLPP16/3733  **Respondent:** 15345601 / Ray Salim  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Flooding: The site behind Ockham Road North in East Horsley is partially a level 3 flood risk area, and local residents are well aware of how much standing water there is in their gardens after rain. Building on such land will only exacerbate the problem. We already know what happens to local roads when it rains – the drains can’t cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

**Comment ID:** PSLPP16/3783  **Respondent:** 15348033 / Peter Nicholas  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to development in areas which are at risk of flooding (Policy P4).

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

**Comment ID:** PSLPP16/3880  **Respondent:** 15349281 / Steve Aptel  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
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The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13642  Respondent: 15349281 / Steve Aptel  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/195  Respondent: 15349281 / Steve Aptel  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. I believe this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4239  
Respondent: 15358305 / Frances Hodgson  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to development in areas which are at risk of flooding (Policy P4)

The Plan does not take adequate account of flood risk as required by National Planning Policy.

The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment. This area has flooded many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4397  
Respondent: 15367361 / Greg Ganjou  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

10. DRAINS, WATER SUPPLY, FLOOD RISK, CONGESTION

Our drains, our water supply, our medical facilities and our roads cannot cope with the proposed number of new homes. Building this number of homes will lead to flood risk here and downstream (along the Wey and Thames). The planned development on Green Belt is therefore unsustainable.

In conclusion, I must ask you to revise the housing number, and to amend the Local Plan to utilise brownfield land rather than green field sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Attached documents:

Comment ID: PSLPP16/4848  Respondent: 15377953 / cctvtraining.com ltd (Gordon Tyerman)  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY P4 : Flood risk and water source protection zones

GROUND FOR OBJECTION: There are aspects of this policy which are acceptable; it is sensible to protect groundwater source protection zones, provided that the maps are accurate.

However, urban development on hardstanding does not create increased flood risk, especially where there is the capacity for improved flood resistance measures to be included in the design. Sites such as the Arriva bus depot, on the River Wey bank, are potential high value brownfield land which may not be used for housing because of this policy. The footprint of existing buildings should not be the limit of future development, but the extent of existing hard standing. Tarmac and concrete do not act as functional floodplain, but some land with hard standing close to the river, within the town centre and within easy walking distance of the train station, provides an exciting opportunity for real urban regeneration which could protect the surrounding countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4848  Respondent: 15379969 / Teresa Britton  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
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Attached documents:

Comment ID: PSLPP16/5128  Respondent: 15386017 / Gareth Sinnett  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5147  Respondent: 15386337 / Edna Slater  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5208  Respondent: 15388865 / Andrew Powell-Cullingford  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

4. I object to development in areas which are at risk of flooding (Policy P4)

The Plan does not take adequate account of flood risk as required by National Planning Policy.

The site at Garlick’s Arch (sites A43 and A43a) is classified by the Environment Agency as being in a higher
risk than the Council’s own assessment ie the site is classified as flood zone 3 due to the presence of the stream flowing into the a
River Wey and being heavy clay soil. There is strong anecdotal evidence by long standing local residents that these fields
have flooded many times in recent years in both winter and spring. I object therefore to the local plan being incorrect in
its assessment of sites A43 and A43a in respect of flood risk.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7900  Respondent: 15388865 / Andrew Powell-Cullingford  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

4. I object to development in areas which are at risk of flooding.

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Attached documents:

Comment ID: PSLPP16/5386  Respondent: 15390785 / Francesca Molossi- Murphy  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Attached documents:
(6) Flooding –
The site behind Ockham Road North in East Horsley is partially a level 3 flood risk area, and local residents are well aware of how much standing water there is in their gardens after rain. Building on such land will only exacerbate the problem. We already know what happens to local roads when it rains – the drains can’t cope. There are no plans in place to improve the drains, which are already unable to cope, but rather to place an enormous additional strain on them that will exacerbate the problem and cause further problems for all residents.

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Attached documents:

Comment ID: PSLPP16/10601  Respondent: 15400865 / M J Cunnah  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document: complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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I work in the property sector, and my business relies upon development. I am certainly not opposed to the idea of sustainable, reasonable development - but the proposed plan will ruin the Horsleys, destroy the beauty of the surrounding Green Belt and makes no provision for the obvious strains on services and infrastructure that such development would cause.

I trust that my objections are noted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5646  Respondent: 15405857 / Raymond Mackay  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document: complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to major large housing estates which are in an area of risk of flooding or causing flooding to others, in the Mid Thames area. Each and every new large building estate just makes the problem worse and the major flood relief programme on the Mid Thames was abolished a few years ago by the Government.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I OBJECT to development in areas which are at risk of flooding.

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16847  Respondent: 15422145 / Orlando Lee  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6056  Respondent: 15422529 / David Roberts  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/6089</th>
<th>Respondent: 15422849 / Ryan Clarke and Lauren Emberson</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</td>
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</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY P4

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

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The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16868</th>
<th>Respondent: 15423201 / Alex Bailey</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Flooding
I object to the plan on the grounds of the potential increased flooding it will cause. The site behind Ockham Road North in East Horsley is partially a level 3 flood risk area, and local residents are well aware of how much standing water there is in their gardens after rain. Building on such land will only make the problem worse. Heavy rain already causes flooding on local roads, where the drains cannot cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6123  Respondent: 15424865 / Robert Victor Ewen  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to development in areas which are at risk of flooding.

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

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The site at Garlick's Arch (A43) is identified on the Environment Agency's flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council's SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. This area often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6199  Respondent: 15426337 / C Cope  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to development in areas which are at risk of flooding (Policy P4)

The drainage in these areas cannot cope at the moment. We suffer from flash floods and road closures particularly around Ripley and Ockham. There is nothing in place to rectify this. More building will only increase the flood risk.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/6227  Respondent: 15426369 / Harvey West  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6235  Respondent: 15426657 / Jean Birkby  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6234  Respondent: 15426721 / S Mayersbeth  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6259  Respondent: 15427617 / Ken Scotland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

4.POLICY P4

I OBJECT to development in areas which are at risk of flooding (Policy P4).
National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 Strategic Flood Risk Assessment (SFRA) has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the National Planning Practice Guidance (NPPG)) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

** I object to development in areas at risk of flooding (Policy P4)

The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6375  Respondent: 15430113 / N Cook  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to major large housing estates being built in an area prone to flooding. All proposals for flood relief within the Mid Thames zone have been scraped by the Government, so any additional house building will have a profound effect on flooding and just add to the misery it causes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6423  Respondent: 15430369 / Sarah Long  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6424  Respondent: 15430433 / Simon Greenhill  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6428  Respondent: 15430497 / Martin Chalk  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6566  Respondent: 15434241 / Valerie Sowerby  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6666  Respondent: 15434913 / Margaret Amos  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Flooding at site A46 has always been an issue in the area, which alone makes it completely unsustainable. Even given the best drainage and sewage systems in the place, all that water had to go somewhere, so it's common sense to assume that more residents will experience sewage back-ups and other health issues, and some people elsewhere will have flooded homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6738  Respondent: 15437313 / Sarah Gooden  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

FLOODING

We object to GBC's building of 1100 homes in land parcel A46 due to insufficient attention to the significant flooding risks already present in this area.

There is an extremely high water table in the Normandy/Flexford area and no reference in the GBC plans to improve the water/sewerage management. Already there is inadequate drainage in Normandy and sewerage back-flush problems are regularly experienced around Guildford Road and Glaziers Lane. Every winter the fields in and around Normandy are subject to extreme flooding and therefore unsuitable for building on.

The assessment carried out of the available land takes into account old data regarding flood risk and we question its value.

For a number of years there has been much concern about the high levels of flooding in St Mark's Churchyard, Wyke and the field at the rear of The Old Vicarage is very boggy ground, subject to extreme flooding. Every winter the land is shindown in water and regularly floods some of the properties lining it (eg Tanglewood was flooded by the storms of recent years with several inches of water entering car and integral garage).

Stream Through Land

There is a significant stream which flows along the back of the Guildford Road properties that line this field (behind The Old Vicarage, Wyke). This runs very high in rainy weather and regularly flows over its banks.

Building development on this site and area would exacerbate existing and significant flooding problems. There would be far fewer fields to absorb the excess water and the new "hard-standing" would affect even more adversely the general drainage and sewerage, not to mention the strain added by an increased number of users.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6745  Respondent: 15437889 / Janet Smith  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Flooding, Flood risk and groundwater source production. I am totally opposed to any development on flood plains. Our village suffers from flooding, being close to the flood plain near Burpham Court Farm where a major road development The Clay Lane Link Road remains part of the local plan for infrastructure despite part of the area being 3b flood plain. The Slyfield Area regeneration project also proposes development on some 3b floodplain, to which I object.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6892  Respondent:  15438049 / David A Sprigings  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the inclusion of site policy A43 Land at Garlick's Arch, Send Marsh/Burntcommon and Ripley as it is a flood risk area. The Environment Agency Flood Risk shows this as category 3 high flood risk so it should not be built on.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10683  Respondent:  15438049 / David A Sprigings  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Local Plan, especially the inclusion of Site Policies A25 Gosden Hill Farm, Merrow Lane, A35 Land at former Wisley airfield Ockham, A42 Clockbarn Nursery, Tannery Lane, Send, A43 Land at Garlick's Arch Send Marsh,Burntcommon and Ripley, A44 Land west of Winds Ridge and Send Hill,Send,A45 Land at the rear of the Talbot, High Street,Ripley, A57 The Paddocks,Rose Lane, Ripley and the numerous Site Policies in East and West Horsley as together all the extra building on these sites would considerably increase flood risk in the areas concerned, whilst nothing appears to be done to resolve existing recurring flood problems such as Ockham Road off the A3/Ockham roundabout and the B2215 towards Ripley, both of which flood with alarming regularity.

There is also a risk of additional flooding at the entry to the site by Garlick's Arch where there are a number of existing businesses, between Kiln Lane and Burntcommon Lane junctions. This is because there is a build up of tree debris at the point where the stream enters 3 pipes under Portsmouth Road which, if left unchecked, could form a dam similar to that at the junction of Portsmouth Road and Send Marsh Road which resulted in flooding of numerous houses in Maple Road and Send Marsh Road some years ago.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6782  Respondent:  15438945 / Jacqueline Davies  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to POLICY P4 – Flood risk and water source protection zones

- Inappropriately limits development of urban, browfield, hardstanding sites, pushing development unnecessarily into the countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/6814  **Respondent:** 15439425 / Abigail Cruse  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

NPP states that local Plans need to take account of climate change over the longer term, including factors such as flood risk. The proposed site at Garlicks Arch (A43) is on the Environment Agency’s flood map as being in a flood zone 3 from a river meaning it has a 1 in 100 or greater chance of flooding each year – the HIGHEST risk category, however the site has been assessed as part of the Councils SFRA as a Flood Zone 2 which is between a 1% and 0.1% probability of river flooding annually. This site floods frequently during the winter months, clearly this site is not fit for purpose and needs to be accurately reassessed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/6888  **Respondent:** 15440353 / Alison Boyce  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/6922  **Respondent:** 15440705 / Jane Martin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

There are currently areas susceptible to flooding during heavy rainfall (sustained or not). Additional building on open land will only increase the flooding risk to roads and houses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/6996  Respondent: 15442049 / Ellouise Fassom  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6997  Respondent: 15442081 / Lauren Fassom  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14363  Respondent: 15446401 / Louise Yandle  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY P4 (FLOOD RISK AND WATER PROTECTION):
• Limits development of urban, brownfield, hardstanding sites, pushing development unnecessarily into the countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7282  Respondent: 15446753 / David Boyce  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

4. I object to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk and that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

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months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7343  Respondent: 15448193 / B. A. Howell  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

There is a real risk that excessive flooding will derive from Flood plain building, the proposal of 400 houses plus industrial units at Garlick's Arch is a good example, it regularly floods now during winter, this Plan will make that moreso (Policy P4). No account is made for conservation areas, AONB, scientific interest or wildlife habitat in general.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10852  Respondent: 15448289 / Paul Miller  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7373  Respondent: 15448321 / Nicole Mapplebeck  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7374  Respondent: 15448353 / Emily Roberts  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7375  Respondent: 15448385 / Edward Bates  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
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National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7377  Respondent: 15448449 / Carol Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/7514  Respondent: 15449857 / Fiona Cumberland  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Comment ID: PSLPP16/7522  Respondent: 15449889 / Harriet Bell  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Comment ID: PSLPP16/7628  Respondent: 15450817 / Audrey Gachen  Agent:

I object to POLICY P4 – Flood risk and water source protection zones

- Inappropriately limits development of urban, brownfield, hardstanding sites, pushing development unnecessarily into the countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Comment ID: PSLPP16/7686  Respondent: 15451041 / Iain Bell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

I object to POLICY P4 – Flood risk and water source protection zones

- Inappropriately limits development of urban, brownfield, hardstanding sites, pushing development unnecessarily into the countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to development in areas at risk of flooding (Policy P4)

The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council’s own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7699  Respondent: 15451457 / Camilla Bell  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7717  Respondent: 15451713 / Gaby Attwood  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to development in areas which are at risk of flooding (Policy P4)
National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7731  Respondent: 15451905 / Jonathan Withers  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7754  Respondent: 15451969 / Rosie Lee  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
I OBJECT to development in areas which are at risk of flooding (Policy P4).

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/7944  Respondent: 15454529 / Janet Tarbet  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7943  Respondent: 15454561 / Charles Dadswell  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7942  Respondent: 15454593 / Jack Dadswell  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7938  Respondent: 15454657 / Tracy McGuigan  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14573  Respondent: 15454881 / Mark Fielder  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Flooding needs to be taken into account in the development plans, especially in the case of Garlicks Arch (A43). This area has flooded on more than one occasion and is already marked as a risk area by the Council's own assessment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7931  Respondent: 15454913 / A Burston  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7930  Respondent: 15454945 / Claire Cassar  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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I question the underlying rationale for proposing development plans, particularly with reference to Garlicks Arch (A43) - in an area that has flooded on several occasion and already acknowledged as a risk area by the Councils own assessment. Any development plans for this area needs to consider the impact of flooding as a consequence of further development and the impact of flooding on the proposed developments as well as proposed flood remediation mechanisms.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7929  Respondent: 15455009 / Emma Graham  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7927  Respondent: 15455073 / Amanda Fletcher  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7925  Respondent: 15455105 / Kate Robinson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Attached documents:

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

12) I object to increased risk of flooding

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to development in areas which are at risk of flooding (Policy P4)
National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8351  Respondent: 15464673 / Trudy Grey  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

4. POLICY P4

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8406  Respondent: 15466113 / Tim Grey  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8429  Respondent: 15466177 / D.L. + E.J. Wilkinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY P4 (FLOOD RISK AND WATER PROTECTION):

- Limits development of urban, brownfield, hard standing sites, pushing development unnecessarily into the countryside

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8481  Respondent: 15468097 / Allan Hempstead  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

** I object to development in areas at risk of flooding (Policy P4)

The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/8528  Respondent: 15469249 / Daniel Harris  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8555  Respondent: 15470145 / Linda Eyre  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8708  Respondent: 15475041 / Anne Geary  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8727  Respondent: 15475297 / Jane Patricia Chandler  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
DRAINS, WATER SUPPLY, FLOOD RISK, CONGESTION

Our drains, our water supply, our medical facilities and our roads cannot cope with the proposed number of new homes. Building this number of homes will lead to flood risk here and downstream (along the Wey and Thames). The planned development on Green Belt is therefore unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT TO POLICY P4 (FLOOD RISK AND WATER PROTECTION):
• Limits development of urban, brownfield, hardstanding sites, pushing development unnecessarily into the countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15893  Respondent: 15478209 / Sally Daboo  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9078  Respondent: 15478785 / Alicia Grainger  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Perhaps most importantly, the statement included in the plan “We will continue to protect the Metropolitan Green Belt” goes against everything that the Plan proposes to do in East and West Horsley, with 65% of the new houses being built on Green Belt land. Protection of the Green Belt land has to be one of the most important issues for villages like West and East Horsley and the impact on flooding control, tourism and leisure, rural businesses, natural heritage and biodiversity have not been considered. There is a disproportionate amount of development to be in the Green Belt, with too few homes in urban areas where most people (especially the young and less privileged) want to live.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
This limits development of urban, brownfield, hardstanding sites, and pushes development unnecessarily into the countryside, simply pushing the problems of flooding elsewhere. West Horsley is already surrounded by many waterways, rivers and streams which in heavy rain regularly causes flooding on the roads. Further housing development in the area is going to cause even worse problems.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick’s Arch which is designated as flood zone 3 by the Environment Agency.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9485  Respondent: 15482817 / C.E. Pullen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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The site at Garlick's Arch (A43) is identified on the Environment Agency's flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council's SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding.

Knowing the area well, I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/9595  Respondent: 15483713 / Claire Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

** I object to development in areas at risk of flooding (Policy P4)

The Environment Agency classifies the site at Garlick's Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to development in areas which are at risk of flooding (Policy P4)
The Plan does not take adequate account of flood risk as required by National Planning Policy.

The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment. This area has flooded many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9822  Respondent: 15486177 / Daniel Peyton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Attached documents:

Comment ID: PSLPP16/9831  Respondent: 15486305 / Noel Ainsworth  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9846  Respondent: 15486849 / Eric Waestaff  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9957  Respondent: 15495201 / Viliv Viana  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9970  Respondent: 15495233 / Harriet Philips  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9987  Respondent: 15495297 / Daniel Perkin  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9991  Respondent: 15495361 / Therese Elizabeth Hill  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9997  Respondent:  15495489 / Stephen Hill  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10004  Respondent:  15495585 / Cristiano Vitor De Oliveira  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10582  Respondent:  15495617 / Peter Elliot  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

10. I object to development in areas which are at risk of flooding such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to development in areas of high risk of flooding (Policy P4)

NPP states that local Plans need to take account of climate change over the longer term, including factors such as flood risk. The proposed site at Garlicks Arch (A43) is on the Environment Agency’s flood map as being in a flood zone 3 from a river meaning it has a 1 in 100 or greater chance of flooding each year – the HIGHEST risk category, however the site has been assessed as part of the Councils SFRA as a Flood Zone 2 which is between a 1% and 0.1% probability of river flooding annually. This site floods frequently during the winter months, clearly this site is not fit for purpose and needs to be accurately reassessed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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Attached documents:

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Comment ID: PSLPP16/10147  Respondent: 15497441 / Holly Hicks  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
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Attached documents:

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Comment ID: PSLPP16/10177  Respondent: 15497505 / Jyoti Nanda  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to development in areas which are at risk of flooding (Policy P4).

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough's identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick's Arch (A43) is identified on the Environment Agency's flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council's SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPP16/10156  Respondent: 15497537 / Caroline Sheppard  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
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Attached documents:
Comment ID: PSLPP16/10203  Respondent: 15497953 / Rebecca Dougherty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

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Attached documents:

Comment ID: PSLPP16/10215  Respondent: 15498049 / Natasha Howard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

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Attached documents:

Comment ID: PSLPP16/10231  Respondent: 15498241 / Faye Church  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

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Attached documents:

Comment ID: PSLPP16/10235  Respondent: 15498369 / Kris Steadman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

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National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough's identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick's Arch (A43) is identified on the Environment Agency's flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council's SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding.

Knowing the area well because I live alongside it. I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The primary river in Guildford is the River Wey and its tributaries enter the River Thames at Shepperton. Spelthorne BC would be concerned if a reduction of floodplain storage in its upper catchment would result in greater flood water levels entering the Thames and affecting Spelthorne. This Council would therefore agree that Policy P4 on flood risk should ensure that flood storage capacity is maintained and ideally bettered, as any loss in capacity could lead to increased flows downstream. Spelthorne’s own policy on flooding (policy LO1 of the Core Strategy and Policies DPD 2009) reflects these principles of flood storage capacity.

I trust that you will find these comments helpful, but please let me know if you require further clarification on any of the points raised. We look forward to further discussions under the Duty to Cooperate in due course as necessary.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPP16/10486  Respondent: 15502241 / Richard Atkinson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

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Comment ID: PSLPP16/10334  Respondent: 15502305 / S. Gibbs  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
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Attached documents:

Comment ID: PSLPP16/11811  Respondent: 15502465 / Mark Bourner  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Flooding - During the heavy winter rains we have experienced over the past couple of years the Horsley area has suffered with terrible flooding, which particularly affect he major roads though the village which all flood. With additional building and additional cars, this issue and the congestion it causes will get much worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10352  Respondent: 15502817 / Linda Margaret Cutbush  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Attached documents:

Comment ID: PSLPP16/10366  Respondent: 15502977 / Alexandra Morton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

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Attached documents:
Comment ID: PSLPP16/10456  Respondent: 15503777 / Elya Koudou  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

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Attached documents:

Comment ID: PSLPP16/10513  Respondent: 15504001 / Margaret Banks  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

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Attached documents:

Comment ID: PSLPP16/10697  Respondent: 15504929 / William Scott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

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Attached documents:

Comment ID: PSLPP16/10732  Respondent: 15505377 / Simon Wright  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
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Comment ID: PSLPP16/10736  Respondent: 15505409 / Ian Cunningham  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
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Comment ID: PSLPP16/10740  Respondent: 15505537 / Vincent Carley  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
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Comment ID: PSLPP16/10800  Respondent: 15506177 / Jean Calas-Hathaway  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

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Comment ID: PSLPP16/10845  Respondent: 15506209 / Rosemary Richardson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

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Comment ID: PSLPP16/10844  Respondent: 15506305 / Pamela Sadler  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

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Comment ID: PSLPP16/10842  Respondent: 15506401 / Alicia Robinson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

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Comment ID: PSLPP16/10895  Respondent: 15507329 / Manner Kaur  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

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Comment ID: PSLPP16/10899  Respondent: 15507457 / Andre Rose  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

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Comment ID: PSLPP16/10904  Respondent: 15507489 / K Garner  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

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<th>Comment ID: PSLPP16/11023</th>
<th>Respondent: 15507713 / Yvonne Connolly</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</td>
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| Comment ID: PSLPP16/11024 | Respondent: 15507745 / M Grainger | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4 |
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| Comment ID: PSLPP16/11026 | Respondent: 15507809 / M Smith | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4 |
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| Comment ID: PSLPP16/11027 | Respondent: 15507841 / Mark Fenner | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4 |
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| Comment ID: PSLPP16/11028 | Respondent: 15507873 / Andy Tupper | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4 |
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Comment ID: PSLPP16/11029  Respondent: 15507905 / Hannah Lewis  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
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Comment ID: PSLPP16/11030  Respondent: 15507969 / Ian Draper  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
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Comment ID: PSLPP16/11031  Respondent: 15508001 / Lisa Barwick  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
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<td>I OBJECT. Urban development on existing hard standing would not create additional flood risk, but the extent of existing hard standing would. Tarmac and concrete do not act as functional floodplain, and some land with hard standing close to the river, within the town centre and within easy walking distance of the railway station, provides an excellent opportunity for real urban regeneration that could protect the surrounding countryside If the avoidance of flooding was designed in to the structures.</td>
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<th>Comment ID: PSLPP16/11248</th>
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<td>Policy P4 - Flood Risk and Water Source Protection Zones</td>
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All development sites must have consideration to flood risk, not just on the development, but the affects on the surrounding areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/15287</th>
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National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

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<th>Comment ID: PSLPP16/15284</th>
<th>Respondent: 15571201 / Zoe Dudgeon</th>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11442  Respondent: 15571425 / Monika Neczaj  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY P4 (FLOOD RISK AND WATER PROTECTION):

- Limits development of urban, brownfield, hardstanding sites, pushing development unnecessarily into the countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11486  Respondent: 15571553 / Darren Carbine  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY P4 – Flood risk and water source protection zones - I OBJECT.

Urban development on existing hardstanding would not create additional flood risk, especially where there is scope for improved flood resistance measures to be included in the design. I have attached pictures taken of flooding on Ripley Lane, West Horsley, in June (yes June!) 2016, after two days of rain - this lane is symptomatic of the area around West Horsley, where there are proposed no less than 2500 homes inside a two mile radius. It is madness to think the environmental impact will be colossal caused by more run off and concrete.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11506  Respondent: 15571617 / Bruce Garbutt  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object that the flood risk maps included in the Plan are out of date, they differ from those published currently by the Environment Agency and, in some cases, those shown are not supported by the flood data available from the Environment

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11509  Respondent: 15571617 / Bruce Garbutt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to large scale development in areas which are at risk of flooding - Policy P4

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11777  Respondent: 15571617 / Bruce Garbutt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

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POLICY P4 Flood risk and Water Source Protection Zones

I object to development in areas which are at risk of flooding (Policy P4). National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11517  Respondent: 15571681 / Anne Martin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to development in areas which are at risk of flooding (Policy P4)
The Plan does not take adequate account of flood risk as required by National Planning Policy.
The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment. This area has flooded many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan.

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<th>Comment ID: PSLPP16/11529</th>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12101  Respondent: 15579649 / Peter E May  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

4. I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12197  Respondent: 15581665 / Laura Daboo  Agent:
I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I
cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12199  **Respondent:** 15581761 / Peter Lee  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12340  
Respondent: 15582593 / Dermot McMullan  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12403  
Respondent: 15583169 / Poul Jensen  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to development in areas which are at risk of flooding (Policy P4)

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12452  Respondent: 15583585 / Josephine Rooke  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

** I object to development in areas at risk of flooding (Policy P4)

The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12453  Respondent: 15583617 / Deborah Gillam  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

** I object to development in areas at risk of flooding (Policy P4)

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12497  Respondent: 15583809 / Nigel Stephenson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
1. **I object to development in areas which are at risk of flooding (Policy P4)**

   This Plan does not take adequate account of flood risk as required by National Planning Policy.

   The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a much higher risk than the Council’s own assessment. The area has flooded many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan.

   **What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

   **Attached documents:**

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**I object to development in areas at risk of flooding (Policy P4)**

The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**POLICY P4**

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National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter.
months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12590  Respondent: 15584481 / Jeremy Hamilton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to development in areas at risk of flooding (Policy P4)

The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12620  Respondent: 15584641 / Miriam Gilkerson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to development in areas at risk of flooding (Policy P4)

The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12636  Respondent: 15584833 / Maria Fort  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.
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The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. I believe this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12651  Respondent: 15584961 / Helen Meredith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY P2

I object to this Policy on the grounds that this is not protecting the Green Belt (Policy P2). This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt. In addition other changes within the plan, such as the change to the village settlement area within West Clandon and other villages will result in other pieces of Green Belt land (such as land at Barn End, The Street, West Clandon) being developed for housing in addition to the sites allocated within the proposed plan.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study commissioned by Guildford Borough Council was a simplistic tick box exercise. It failed to carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt sites proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether they should be
removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an ‘exceptional circumstance’ nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned.

I note that the Summer 2016 edition of “About Guildford” (published by the Council) on page 5 states that “... the Plan rejects any schemes that would have a detrimental impact on the Green Belt.” This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I believe that the consultation process was flawed and ineffective because of this.

I object extremely strongly to the “insetting” of 14 villages from the Green Belt. These villages contribute to the openness of the Green Belt and there is no need to inset them. To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and village settlement boundary extensions go ahead.

I object extremely strongly to the wholesale extension to the settlement boundaries in many villages which is a change made since the 2014 version of the Plan and in relation to which there has been no consultation. This change will allow infilling in the Green Belt. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development. For example, Guildford Borough Planning Department are already well aware of multiple previous applications for planning permission for a large number of houses made by Philip Christian of Stonehaven homes on a 5 acre strip of Green Belt at Barn End, The Street, West Clandon. Careful examination of the village settlement area of West Clandon shows that the existing West Clandon village settlement area had been very carefully drawn around the boundaries of this piece of Green Belt so as to protect this from development. The land is of environmental significance as this provides a green wildlife corridor adjacent to protected woodland. In the past every application has been refused locally and the decisions have been upheld on Appeal but that position will be impossible to sustain if this land is included in the proposed new settlement boundary for West Clandon I live next to this piece of land and have seen Surveyors working on the site in the last week presumably preparing an application for planning permission to develop the site wholesale if the draft Local Plan comes into force.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as it is factually incorrect.

In addition I object to the proposals to remove from the Green Belt Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the Green Belt they will be lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site. Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12762  Respondent: 15585601 / Sophie Corstin  Agent:
1. **POLICY P4**

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
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The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12926  Respondent: 15586017 / C Maslin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY P4 FLOOD RISK

I object to policy P4 Flood risk and water source protection zones.

Urban development on existing hardstanding would not create additional flood risk, especially where there is scope for improved flood resistance measures to be included in the design. Sites such as Woodbridge Meadows Industrial Estate and the Arriva bus depot, on the River Wey bank, are potential high-value brownfield sites that would not be available for housing if this policy is implemented. It is not the footprint of existing buildings that should limit future development, but the extent of existing hardstanding. Tarmac and concrete do not act as functional floodplain, and some land with hard standing close to the river, within the town centre and within easy walking distance of the railway station, provides an excellent opportunity for real urban regeneration that could protect the surrounding countryside.

I strongly believe that this policy should not be used as a convenient excuse not to build on the extensive area of brownfield sites between the station and Ladymead. Any new development in this area could easily be built on stilts with flood resistant ground floor parking in areas that are identified as high flood risk. This area has been built over successfully over the last 50 years. We do not need to stop now.

I do not support building directly on (as opposed to over) flood plain as the land is effectively a soak away, but intelligent architecture has been dealing with this problem for many decades in other parts of the UK and the globe.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12885  Respondent: 15587105 / John Downes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12987   Respondent: 15587233 / Jane Clark   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to development in areas which are at risk of flooding (Policy P4)

The Plan does not take adequate account of flood risk as required by National Planning Policy.

The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment. This area has flooded many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13017   Respondent: 15587361 / Aileen Creegan   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13210  Respondent: 15588897 / John Attridge  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Plan does not appear to take adequate account of flood risk, as is required by National Planning Policy. It is well known that housing leads to additional risks from flooding, as rainfall is directed towards inadequate sewer systems rather than soaking into soil. The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment. This area has flooded many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13216  Respondent: 15588929 / Alex Hutchings  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY P4

I OBJECT to development in areas which are at risk of flooding (Policy P4)

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13360  Respondent: 15590241 / Claire Tallis  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Attached documents:

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Comment ID: PSLPP16/13374  Respondent: 15590273 / Eunja Madge  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/13460  **Respondent:** 15590593 / Johnathan Page  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPP16/13628  **Respondent:** 15593729 / Martin Warwick  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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**Attached documents:**

**Comment ID:** PSLPP16/13629  **Respondent:** 15593761 / Celestyn Kwapisiewicz  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Attached documents:

Comment ID: PSLPP16/13914   Respondent: 15598241 / Madeleine Hewish   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Attached documents:

Comment ID: PSLPP16/14055   Respondent: 15601057 / Chris Vinall   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Attached documents:

Comment ID: PSLPP16/14085  Respondent: 15601121 / Elspeth Anderson  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Attached documents:

Comment ID: PSLPP16/14124  Respondent: 15601185 / Jane Young  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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- Limits development of urban, brownfield, hardstanding sites, pushing development unnecessarily into the countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14319  Respondent: 15602177 / Julia Hunt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to policy P4 Flood risk and water source protection zones Urban development on existing hardstanding would not create additional flood risk, especially where there is scope for improved flood resistance measures to be included in the design. Sites such as Woodbridge Meadows Industrial Estate and the Arriva bus depot, on the River Wey bank, are potential high-value brownfield sites that would not be available for housing if this policy is implemented. It is not the footprint of existing buildings that should limit future development, but the extent of existing hardstanding. Tarmac and concrete do not act as functional floodplain, and some land with hard standing close to the river, within the town centre and within easy walking distance of the railway station, provides an excellent opportunity for real urban regeneration that could protect the surrounding countryside.

I strongly believe that this policy should not be used as a convenient excuse not to build on the extensive area of brownfield sites between the station and Ladymead. Any new development in this area could easily be built on stilts with flood resistant ground floor parking in areas that are identified as high flood risk. This area has been built over successfully over the last 50 years. We do not need to stop now.

I do not support building directly on (as opposed to over) flood plain as the land is effectively a soak away, but intelligent architecture has been dealing with this problem for many decades in other parts of the UK and the globe.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14400  Respondent: 15602561 / Jonathan Clark  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to development in areas which are at risk of flooding (Policy P4)

The Plan does not take adequate account of flood risk as required by National Planning Policy.

The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment. This area has flooded many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
<table>
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<tr>
<th>Comment ID: PSLPP16/14436</th>
<th>Respondent: 15602817 / Paul Douek</th>
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| Comment ID: PSLPP16/14543 | Respondent: 15603489 / Simon Pitt | Agent: |
I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14612  Respondent: 15603905 / Michael Douek  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

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Attached documents:

Comment ID: PSLPP16/14658  Respondent: 15604289 / Lesley Pitt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

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Attached documents:

Comment ID: PSLPP16/14669  Respondent: 15604449 / Annabel Curling  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
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Comment ID: PSLPP16/14712  Respondent: 15606561 / Rebecca Warwick  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
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** What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPP16/14713  Respondent: 15606593 / James Green  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

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Comment ID: PSLPP16/14714  Respondent: 15606625 / Rebecca Sear-George  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

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Comment ID: PSLPP16/14715  Respondent: 15606657 / Kim Hopwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

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<th>Respondent: 15607553 / Penelope Gillmore</th>
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Attached documents:

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Comment ID: PSLPP16/15111  Respondent: 15610465 / Tess Corlett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

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Attached documents:

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Comment ID: PSLPP16/15128  Respondent: 15610529 / Mark Ransome  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

There is too much traffic in our villages already. The roads are busy throughout the day and not just at rush hour. This plan will cause more congestion in Ripley, Send and Clandon, with no plan to improve that.

The rural roads in this area are narrow, in poor condition and have no footpaths.

Instead of building 5000 more houses which means dangerous and unsustainable traffic. The money would be better improving those roads so local communities can use them safely.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15181  Respondent: 15610785 / Liz Vinall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

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<th>Comment ID: PSLPP16/15229</th>
<th>Respondent: 15611105 / Ramsey Shubbar</th>
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Attached documents:
Comment ID: PSLPP16/15454  
Respondent: 15614753 / Anthony McCulloch  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Already, with no additional building, we are constantly flooded (even in the months of June and July 2016), as the drainage in the area is inadequate.

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Comment ID: PSLPP16/15453  
Respondent: 15614785 / Richard Palmer  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

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Comment ID: PSLPP16/15452  
Respondent: 15614817 / Jan Pearson  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

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Comment ID: PSLPP16/15451  
Respondent: 15615233 / Gareth Nassh  
Agent:

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<th>Comment ID: PSLPP16/16075</th>
<th>Respondent: 15631105 / Pamela Jacqueline Hagan</th>
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I object to developing areas with risk of flood (policy P4).

National Policy requires adequate account of flood risk: Garlick’s Arch (A43) is at higher risk than the council’s assessment, this having been classified by the environment agency.

The incidence of flooding has increased considerably in recent years.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<th>Comment ID: PSLPP16/16333</th>
<th>Respondent: 15640897 / Jackie van Heesewijk</th>
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**I OBJECT TO POLICY P4 (FLOOD RISK AND WATER PROTECTION):** • Limits development of urban, browfield, hardstanding sites, pushing development unnecessarily into the countryside.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<th>Comment ID: PSLPP16/16355</th>
<th>Respondent: 15641281 / Paula Redmond</th>
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I object to development in areas which are at risk of flooding and may increase likelihood or worse effects of flooding in the locality (Policy P4)

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Comment ID: PSLPP16/16685  Respondent: 15649601 / Laura Bushnell  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Flooding
The site behind Ockham Road North in East Horsley is partially a level 3 flood risk area, and so building on such land will only exacerbate the problem. There are already many issues with overflowing drains on the local roads in this area when it rains.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPP16/16768  Respondent: 15650369 / Stephanie Dean  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY P4 Flood risk and Water Source Protection Zones

I object to development in areas which are at risk of flooding (Policy P4). National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay.

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Comment ID: PSLPP16/16799  Respondent: 15652833 / Don Babington  Agent:
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<th>Comment ID: PSLPP16/17617</th>
<th>Respondent: 15689953 / Environment Agency (Oliver Rathmill)</th>
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2.1 Policy P4 – Flooding, flood risk and groundwater source production
We support the inclusion of a specific policy for flood risk and welcome the protection of groundwater within Policy P4. In addition, we pleased to see the distinction between developed and undeveloped flood zone 3b explained and included within the policy wording, which provides clarity on what is appropriate development in the functional flood plain.

2.1.1 Points of soundness
We do not consider that sufficient reference has been made to the impacts of climate change on the flood risks associated with development. The NPPF sets out how the planning system should help minimise vulnerability and provide resilience to the impacts of climate change. We consider that without specific mention of the flood risks associated with climate change that the Plan is not consistent with paragraph 99 of the NPPF.

2.1.2 Overcoming this point of unsoundness
We recommend that in accordance with the paragraph 99 of the NPPF Policy P4 can be re-worded to reference climate change. For instance:

- a site-specific flood risk assessment demonstrates that the development will be safe for its lifetime, taking into account climate change, including access and egress, without increasing flooding elsewhere, and where possible, will reduce flood risk overall

2.1.3 Points of accuracy and clarity
In the interests of accuracy and clarity we recommend that this Policy is retitled to reflect the correct terminology:

Policy P4 – Flooding, flood risk and groundwater protection zones

In the interest of accuracy and completeness we suggest that the following is added to the end of Paragraph 4.3.39:

- All other land surrounding this is important flow routes and should be retained.
- In the interest of accuracy and clarity we suggest that the following is added to the details regarding development in areas at risk of flooding in Policy P4:
  - site drainage systems are appropriately designed taking into account of storm events up to 1 in 100 year chance of flooding with an appropriate allowance for climate change allowance.

While Policy P4 makes reference to the protection of Groundwater Source Protection Zones, however, in-line with paragraph 109 of the NPPF in the interests of accuracy and clarity we suggest the following wording:

Development within Groundwater Source Protection Zones and Principal Aquifers will only be permitted provided that it has no adverse impact on the quality of the groundwater resource and does not put at risk the ability to maintain a public water supply.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1831  Respondent: 15689953 / Environment Agency (Oliver Rathmill)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

1 Points of soundness

1.1 Points of soundness summary
We welcome and support a number of the changes that have been implemented since we reviewed the Proposed Submission Local Plan: strategy and sites dated June 2016. However, we consider the plan to be UNSOUND in its current form due to issues relating to flood risk.

1.2 Policy P4: Flooding, flood risk and groundwater protection zones
We consider that Policy P4 does not reflect some of the conclusions within the evidence submitted in the Strategic Flood Risk Assessment (SFRA) Level 1. Therefore, we do not consider this policy to be justified by the evidence base or consistent with the National Planning Policy Framework (NPPF) and associated Planning Practice Guidance (PPG).
On page 5 of the Level 1 SFRA it is made clear with regards to development within the functional floodplain that “there should be no increase in development vulnerability or intensification in use”. We note that this is not reflected in Policy P4.

1.2.1 Overcoming this point of soundness
In order to overcome this point of soundness we recommend that Policy P4 (3) is updated to reflect your SFRA:
“Development proposals in the ‘developed’ flood zone 3b will also only be approved where the footprint of the proposed building(s) is not greater than that of the existing building(s) and there will be no increase in development vulnerability or intensification in use. Proposals within these areas should facilitate greater floodwater storage.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
"and there will be no increase in development vulnerability or intensification in use"

Attached documents:

Comment ID: pslp171/1835  Respondent: 15689953 / Environment Agency (Oliver Rathmill)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

2.3 Policy P4: Flooding, flood risk and groundwater protection zones
We welcome the inclusion of a majority of the advice we provided in July 2016, in particular the specific mention of the
flood risks associated with climate change within Policy P4 (2) (c).

2.3.1 Paragraph 4.3.36
For the sake of clarity we recommend adding the date of the Flood and Water Management Act (2010). In addition, specific mention of Thames Water as a Risk Management Authority could be made, as they have a significant role in relation to managing flood risk from sewers.

2.3.2 Paragraph 4.3.42
We welcome the recognition of sensitive groundwater receptors within the Borough. We recommend that reference is made to the most up-to-date version of the Environment Agency’s groundwater protection position statements which can be found at: https://www.gov.uk/government/publications/groundwater-protection-position-statements

2.3.3 Site allocations and groundwater protection
We wish to note that sites within the inner source protection zone (SPZ1) often have specific requirements to protect groundwater. We recommend that the following groundwater issues are added to the list of key considerations for the preferred sites listed in Appendix A to this letter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Appendix A – Sites with groundwater protection concerns
Site Key Consideration
A1 Principal Aquifer
A3 Northern tip of site in SPZ1, Principal Aquifer
A5 SPZ1
A6 SPZ1
A7 SPZ1
A8 SPZ1
A9 SPZ1
A11 SPZ1
A12 SPZ1
A13 SPZ1
A14 SPZ1
A15 Partly in SPZ1
A18 SPZ1
A23 The site is a proposed burial ground, special consideration is required regarding the depth to groundwater. Refer to the appropriate section of the Groundwater protection position statements guidance *
A24 SPZ1 and historic landfill on part of site.
A26 Principal Aquifer
A37 Principal Aquifer

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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</tbody>
</table>
Within your plan the following four sites are based on high level flood risk information:

| POLICY A39: Land near Horsley railway station, Ockham Road, North, East Horsley (assessment based on Flood Zones) |
| POLICY A40: Land to the north of West Horsley (assessment based on Flood Zones) |
| POLICY A50: Land at Whittles Drive, Aldershot Road, Normandy (assessment based on Flood Zones) |
| POLICY A54: Lakeview, Lakeside Road, Ash Vale (assessment based on detailed flood model (Blackwater 2007) 1 in 100 year flood) |

Although you have deemed these to have passed the flood risk sequential test as noted below we would expect that at planning application stage detailed flood modelling is undertaken. We note that the new climate change allowances haven’t been specifically mentioned in the Level 2 SFRA or local plan. However, the majority of allocated sites have detailed modelling where the 1 in 1000 year (0.1% annual exceedance probability) is available, these sites have been assessed against the 1 in 1000 year flood. For the purpose of accuracy and clarity we recommend that this approach of using the 1 in 1000 year flood event to account for climate change is clearly set out in the SFRA Level 2.

If these sites are adopted, at the planning application stage we would expect an assessment of climate change (using the new allowances) to be undertaken by applicants. We recommend applicants consult with the most recent national climate change guidance including our Thames Climate change guidance.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17830  Respondent: 15703937 / Graham Vickery  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the plan not taking into proper consideration the flooding Level 3 risk at the north end of the village toward Ockham where all natural surface flood waters fetch up at the drainage ponds bordering the parish borders between Horsley and Ockham and thus why the area has never been developed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17880  Respondent: 15705729 / Martyn Heard  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to development in areas which are at risk of flooding (Policy P4)
The Plan does not take adequate account of flood risk. It appears that the Council's assessment of the flooding risk is flawed.

The site at Garlick's Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council's assessment.

This area has flooded many times in recent years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/18417  Respondent: 15724353 / Arvnid Parmar  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document: complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of “About Guildford” (published by the Council) on page 5 states that “... the Plan rejects any schemes that would have a detrimental impact on the Green Belt.” This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I
assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/18466  **Respondent:** 15724801 / Talei Fawcett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/18506  **Respondent:** 15725409 / Nicholas Ward  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

I OBJECT to development in areas which are at risk of flooding (Policy P4).

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Comment ID: PSLPP16/9875  Respondent: 15922337 / Andrew Malcher  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15567  Respondent: 15977889 / Charles Kimpton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

OBJECT. Thames Water has advised Guidford Borough that the current wastewater network is unlikely to support the demand from all the developments envisaged for West Horsley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/166  Respondent: 17240193 / Anita Aptel  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. I believe this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Although I welcome the fact that flow routes will be considered as part of any Flood Risk Assessment, I am still totally opposed and object to any development on flood plains. Jacobs Well suffers from flooding, being close to the zone 3b floodplain near Burpham Court Farm where a major road development, The Clay Lane Link Road, is still under consideration. With town centre and SARP development going ahead (and related flood risk mitigation), plus climate change (and the increased potential for flash storms), to ensure risk to properties is only once per 100 years, the Burpham Court Farm zone 3b flood plain is therefore even more important in reducing the risk of flooding in Jacobs Well and must be preserved as is and not developed upon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.
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The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
3.17 The centre of Guildford is affected by flooding from the River Wey. Large parts of the town centre alongside the river are within flood zone 3b. If the wording of policy P4 is to be followed, there is no restriction, other than the established development management policies, on the height of the buildings that could be developed on the sites. The GVG Masterplan seeks to avoid earlier mistakes and addresses the central issues around flooding, to the benefit of the town centre and better provision of housing in a materially improved setting.

3.18 The flooding topic paper which forms part of the evidence base for the Local Plan sets out at para 5.9 that:

*The Council’s Level 1 SRFA notes that some of Guildford’s functional floodplain (flood zone 3b) has historically been built upon. The document therefore differentiates between the ‘developed functional floodplain’ and the ‘undeveloped functional floodplain’. Whilst the NPPF states that the functional floodplain should be reserved for water storage and flow in times of flood, the SRFA argues that development or redevelopment in the ‘developed functional floodplain’ may be acceptable when flood risk betterment, appropriate mitigation and risk management can be achieved and implemented. Given the findings of the Level 1 SFRA, it is reasonable to argue that the functional floodplain does not need to be entirely excluded from development and can contribute to accommodating the borough’s objectively assessed needs, if betterment, mitigation and management can be achieved.*

3.19 Whilst the main thrust of policy P4 complies with guidance on sequential and exception tests, the requirement of development proposals to not be greater than the footprint of the existing building fundamentally undermines the potential of town centre sites to deliver significant levels of housing or other uses.

3.20 The GVG Masterplan considers an innovative solution to protection of future residents from flood risk by raising the street level above current levels. It places car parking and other compatible uses on the lower ground floor or undercroft, while residential units are placed on upper floors with dry access provided in the event of a flood.

3.21 Furthermore the second point of bullet point 3 states that:

*Proposals within these areas should facilitate greater floodwater storage.*

3.22 The masterplan as prepared by GVG seeks a strategic approach to the potential for floodwater storage in areas of functional flood zone through the provision of substantial sustainable urban drainage systems. These could be accommodated under areas of public open space. The provision of large areas of tiered public open space around Guildford Wharf, Walnut Tree Close and Woodbridge Meadows will also allow for the improvement of the area of functional floodplain within the town centre.

3.23 The delivery of policy E7 in relation to Guildford town centre supported by Guildford Town Centre Regeneration Strategy 2017, with the previous links to the Allies and Morrison draft Town Centre Vision (2015) and the Guildford Town Centre Masterplan (2015) now having been deleted.

3.24 Whilst the Allies and Morrison vision and masterplan previously sought to avoid the areas of functional flood plain for development, the Guildford Town Centre Regeneration makes reference to the provision of Enhanced Amenity and Flood Protection. This section recognises the potential for development in areas of flood zone but does not satisfactorily set out a solution or conjoined strategy to deal with these fundamental issues. The document states that:

*As sites and schemes are investigated in more detail, viability issues will invariably come in to play and decisions will need to be made as whether to progress certain major projects. This is one of the reasons that the Town Centre Regeneration Strategy and its associated Work Programmes are intended to be ‘living, flexible documents’.*

3.25 GVG submits that this level of ambiguity and lack of commitment is simply not good enough to support the delivery of material quantities of housing in the town centre. This requires a coordinated and comprehensive approach. This is what GVG recommends and have allowed for under its preferred approach for the town. The current approach of GBC (see appendix 6 with site marketing particulars) through piecemeal development of town centre sites does not allow for a co-ordinated approach to flood risk which is of significant importance for the success of the wider development strategy
for the borough, or other strategic objectives such as power delivery and district centres. It also at the same time fails to positively and comprehensively address urban form that currently contributes to flooding.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/2097  Respondent: 17976417 / Thakeham Homes (Sir or Madam)  Agent: RPS Planning & Development (Cameron Austin-Fell BA)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

5.30 In relation to the proposed policy, RPS considers that the Council needs to offer clearer advice in terms of how it responds to the necessary allowance for climate change. The current wording, which indicates that an ‘appropriate allowance’ should be made, is not an appropriate policy mechanism to give this certainty of delivery. The Council should instead offer greater certainty about what is required, justified by evidence and policy guidance.

5.31 As part of the appended documents supporting the Fairlands Delivery Document it has been demonstrated that there is acceptable attenuation storage for a 1 in 100 flood event, and also includes a 40% climate change return period. This responds to the evidence base for the site, which took into account the total potential change in rainfall in 2080.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

Document part: Policy P5 - Thames Basin Heaths Special Protection Area
### Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

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<td>In 4.3.50c, it should be clear that mitigation requires a new opportunity for recreation in natural greenspace or an improvement to the natural qualities available to be enjoyed in an existing green space. It is not acceptable to repackage, overly manicure or introduce intrusive recreational features in an area of natural beauty already enjoyed by the public.</td>
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<th><strong>Respondent:</strong> 8559297 / Holy Trinity Amenity Group (Robert Bromham)</th>
<th><strong>Agent:</strong></th>
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<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P5</td>
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<tr>
<td>P5, Thames Basin SPA, P58</td>
<td>Some requirements are unclear, in particular “Measures must be based on a combination of SAMM and the provision, improvement and/or maintenance of SANG”; this appears to be at odds with the other requirement to provide a minimum of 8ha of SANG land per 1,000 occupants. We consider that the only genuine mitigation measure is the provision of new public access land.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td><strong>Attached documents:</strong></td>
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<tr>
<th>Comment ID: PSLPP16/17432</th>
<th><strong>Respondent:</strong> 8563201 / West Horsley Parish Council (Sam Pinder)</th>
<th><strong>Agent:</strong></th>
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<tr>
<td>P5 – Thames Basin Heath Special Protection Areas</td>
<td>Report page: 14</td>
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<td>WHPC view: Supports</td>
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### Comment ID: PSLPP16/17468  Respondent: 8563201 / West Horsley Parish Council (Sam Pinder)  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY P5: Thames Basin Heath Special Protection Areas

WHPC supports this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [WHPC Draft Local Plan response July 2016.pdf](2.2 MB)

### Comment ID: PSLPP16/8114  Respondent: 8569857 / Woking Borough Council (Ernest Amoako)  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- The protection of the Thames Basin Heaths Special Protection Area (SPA) is a strategic issue of significant interest to all the local authorities with SPAs within their boundaries. A Joint Strategic Partnership Board has been set up to ensure that a strategic approach is taken for its protection. In accordance with the relevant legislative guidance, it will be helpful if the policy is drafted to avoid harm to the SPA rather than its current focus on mitigating identified adverse impacts. In this regard, an indication in Policy P5 of whether Guildford Borough Council has identified sufficient SANGs land to meet its development needs would be helpful.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

### Comment ID: pslp171/1428  Respondent: 8569857 / Woking Borough Council (Ernest Amoako)  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The protection of the Thames Basin Heaths Special Protection Area (SPA) is a strategic issue of significant interest to all the local authorities with SPAs within their boundaries. A Joint Strategic Partnership Board has been set up to ensure that a strategic approach is taken for its protection. In accordance with the relevant legislative guidance, it will be helpful if the policy is drafted to avoid harm to the SPA rather than its current focus on mitigating identified adverse impacts. In this regard, an indication in Policy P5 of whether Guildford Borough Council has identified sufficient SANGs land to meet its development needs would be helpful.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

### Comment ID: PSLPP16/2186  Respondent: 8570273 / Fiona Curtis  Agent: Fiona Curtis

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P5
I object to policy P5 Thames Basin Heath Special Protection Areas

This policy is not robust enough. The mitigation (cash compensation) offered for development in the special protection area is so small as to be meaningless. SANG (Suitable Alternative Natural Greenspace) is not beneficial since the sites identified or targeted are already green space. This is just using agricultural or wooded land as recreation land in order to justify building on other green spaces nearby. There is no actual increase in open space or environmental protection; instead, it is a ploy designed to permit building on otherwise protected areas. SANG – in part used to prevent dogs and cats attacking nesting birds – must also ensure that it is not using land which is adjacent to the Special Protection Areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/281  Respondent: 8571521 / Surrey Nature Partnership (Sarah Jane Chimbwandira)  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We welcome and support this policy, and especially the prudent addition of para. 4.3.50a as well as other refinements in this version of the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13041  Respondent: 8573793 / Harry Eve  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

64. I support the need for a policy to protect the SPA but,

I object to the manner in which it is approached.

65. As a naturalist I place a very high value on the protection of the Thames Basin Heaths and other areas important for wildlife. In my opinion the SANG approach is unsound and existing biodiversity at the chosen SANG sites is being ignored despite a requirement to take it into account. One example is Effingham Common which is a breeding site for ground-nesting Skylarks. This year, warning signs to inform dog-walkers of nesting Skylarks were not put up until complaints were made and Skylarks had been chased off their nest by an out-of-control dog (I was an unhappy witness to this).

This is an example of an existing valuable site for biodiversity being used erroneously to justify building near the SPA. It is wrong to claim that SANG is creating new open spaces and enhancing biodiversity. SANG is only created by using existing open space that may or may not have public access but does have existing biodiversity or agricultural use that will be harmed or removed by the change of use. Its effectiveness in drawing people away from the SPA is also highly questionable.
66. Throughout this process, Guildford Borough Council have demonstrated that they place no genuine value on biodiversity or have any real understanding of it. They merely see biodiversity and the SPA as obstacles to be overcome in their quest to impose a forced growth agenda on the residents of Guildford. I believe they underestimate the value that residents place on wildlife and fail to recognise its contribution to our wellbeing.

This policy is unsatisfactory in its current form.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/5955  **Respondent:** 8575585 / Ian Macpherson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy P5: Thames Basin Heath Special Protection Area

The driver here is the European Directives. The detailed rules are set by Natural England, which has its own interpretation of the Directive requirements. This is an area that has raised considerable question and so likely to be reviewed following Brexit, and the commentary should reflect this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/6999  **Respondent:** 8575617 / Effingham Parish Council (Ian Symes)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

P5 Protecting– Thames Basin Heaths SPA

Object

EPC strongly objects to a car park on Effingham Common. The proposed car park location would damage the ecology and habitat of the Common, and would be sited very close to one of the few parts of the Common where Skylarks (now on the Red List in the UK) breed.

EPC believes that the car park would be full of commuters’ vehicles, from early morning to late afternoon, whose owners would be using Effingham Junction Station.

Effingham Common is already very accessible from Effingham Junction station; and the popular Horsley Jubilee Trail, which crosses the Common, has a starting point at Horsley station. Many people use public transport to visit and enjoy the Common.

The Local Plan is proposing two additional SANGs in West Horsley and Wisley. If these are accepted there is no longer a requirement for the SANG at Effingham Common to have a car park situated on the Common.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Object EPC strongly objects to a car park on Effingham Common. The proposed car park location would damage the ecology and habitat of the Common, and would be sited very close to one of the few parts of the Common where Skylarks (now on the Red List in the UK) breed.

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Effingham Common is already very accessible from Effingham Junction station; and the popular Horsley Jubilee Trail, which crosses the Common, has a starting point at Horsley station. Many people use public transport to visit and enjoy the Common.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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This policy, while welcome, demonstrates the irrational approach to this plan and its policies. Policy P4 permits development in a flood plain – which in the worst case means that people could die – yet this policy is protecting (quite rightly) the SPA.

Policy P4 is therefore unsound and irrational.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Clarification of this paragraph is needed viz remove “set out in this policy” and insert “set out in Policy P5.”

[Page 67, 4.3.56]

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
This statement could benefit from a case law example.

[Page 67, Paragraph 4.3.56]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Policy P5: Thames Basin Heath Special Protection Area

In Policy P5, 2nd bullet point, it is written: “Measures will be based on a combination of Strategic Access Management and Monitoring (SAMM) and the provision, improvement and/or maintenance of Suitable Alternative Natural Greenspace (SANG)” The word “improvement” should not be interpreted as recreational facilities which urbanise and harm AONBs which are often chosen as SANGs.

4.3.64: In this paragraph it is written: “Bespoke SANGs may be required to include a combination of benefits, including biodiversity enhancement, green infrastructure and potentially, new recreational facilities in line with the Council’s adopted green infrastructure policies. AONBs are often chosen as SANGs and its needs to be remembered that the prime reason for their existence is their natural beauty as given in the following Act:

“Areas of Outstanding Natural Beauty (AONB) were originally identified via the National Parks and Access to the Countryside Act 1949, with the primary purpose to conserve the natural beauty of the landscape.”

Recreational facilities such as buildings and equipment harm natural beauty and are strongly opposed by residents and visitors. The large amount of money channelled from developers into SANGs should not be used for this purpose, and has no connection with the SPA policy of attracting dog walkers to SANGs.

Wording is needed in Policy Box P5 and paragraph 4.3.64 which ensures that AONBs are protected from harmful recreational facilities, and are enjoyed for their natural beauty and landscape.

SANGs are not appropriate on agricultural land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
In terms of the detail of the proposed housing allocations around Ash and Tongham, other policies in the draft Plan enable the consideration of relevant planning issues; for example, Policy P5 relates to the Thames Basin Heaths Special Protection Area (SPA), and would prevent proposals that are not supported by measures to avoid and mitigate the adverse effects on the ecological integrity of the SPA.

The suite of policies used to support the determination of proposals for residential development and associated infrastructure, including Policy P5, is supported.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICY P5 Thames Basin Heath Special Protection Area

It is a serious mistake that GBC has not taken this constraint into account when arriving at its OAN housing figure.

CPRE has reservations as to how this policy is working but sees little prospect of any change being introduced as its wording does not really fall within local authority control. The principal difficulty is to do with the system of SANGs that has been developed and the way this is being implemented by GBC and other neighbouring districts. Many SPA sites are still being visited by dog walkers in large numbers even when SANGs are supplied, and if these are located near SPA boundaries, damage is quickly done to any ancient woodland and good agricultural land bordering the protection area such as at Blackwell Farm. We have viewed the income generated in Guildford for SANGs at Chantry Woods in the AONB and the Registered Common at Effingham. Greater transparency is required as to how this money is to be spent and where. A key application is to be heard at Worplesdon on 20th July after a long delay as something of a test case at which a proposed SANG application will be consulted upon in the Planning Committee.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We OBJECT to this policy. This policy is weak. The mitigation (cash compensation) offered for development in the special protection area is so small and negligible as to be meaningless. SANG (Suitable Alternative Natural Greenspace) is not beneficial; the sites identified or targeted are already green space. To create SANG is just using agricultural or wooded land as recreation land in order to justify building on other green spaces. There is no actual increase in environmental protection; it is a policy designed to permit building on otherwise protected areas. SANG – in part used to prevent dogs and cats attacking nesting birds - must ensure that it is not using land which is adjacent to the special protection areas.

Thames Basin Heaths Special Protection Area (TBH SPA; see Map 1, Appendix 1), is a statutory designated site and designated for its rare and vulnerable birds, specifically nightjar, Dartford warbler and woodlark under the EC Birds Directive. This site also forms part of the Thursley, Ash, Pirbright and Chobham Special Area of Conservation (SAC), a statutory designated site and designated for its North Atlantic wet heaths, European dry heaths and peat bogs.

We believe that the Plan is unsound as the Habitats Regulations Assessment prepared for GBC does not take sufficient account of the impact seven proposed developments will have upon the Thames Basin Heaths Special Protection Area (TBH SPA) which is a European Site (as defined under the Habitats Directive and Conservation of Habitats and Species Regulations 2010 (as amended).
The seven proposed developments are less than five kilometres away from the TBH SPA and in some cases not much beyond the 400m exclusion zone, occupying an area between under 1km to just over 2km from the TBH SPA. It has been indicated that the cumulative effect of further residential development up to 5 km from protected heathlands will have a significant adverse effect on the heaths. The TBH SPA is an internationally important habitat for three rare species of bird - the Dartford warbler, woodlark and nightjar. The latter two are ground nesting and therefore particularly susceptible to disturbance from people and animals. In fact Natural England believes that recreational use of the heaths arising from housing developments up to five kilometres away from a SPA will create disturbance to rare bird populations.

A survey in 2008 showed that more than 83% of visitors to the SPA arrived by car and that 70% of those had come from within 5km of its access point. A very large proportion of the TBH SPA visitors are dog walkers, many of whom visit a particular site on a regular basis. A follow-up survey in 2012 found that there was a 10% increase in visitors to the SPA.

A survey of households carried out by a veterinary team at Bristol University in 2010 “Number and ownership profiles of cats and dogs in the UK” published in the Journal of The British Veterinary Association indicates 31% households own dogs and 26% households own cats. Dogs were more likely to be owned by rural households.

Applying this analysis for all new housing at the listed strategic housing sites in the draft Local Plan within the 400m-5km mitigation zone of TBHSPA (in total 7,000 new homes), the cumulative impact of dog ownership (up to an estimated 2,200 new dogs within 5 km of TBHSPA) with dog-walker incursions on the rare bird species habitat of the TBHSPA will be a devastating increase. No amount of SANG nor SAMM programmes will change human behaviour and the draft Local Plan evidence base contains no studies or data to prove otherwise, it contains only unproven assertions. Natural England can provide no survey evidence of the effectiveness of SANG or SAMM programmes in attracting dog-walkers and other visitors away from TBHSPA.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to such a weak policy, where the mitigation of cash compensation is too small to be meaningful.

I object to the use of SANGs for most of the proposed sites as these areas are already farmland, woodland or open green spaces.

SANGs should not be positioned near nesting birds, which will be threatened by the pet cats and dogs resident in the new homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2310  Respondent: 8671969 / Valerie Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

P5 Thames Basin Heath

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I object to the use of SANGs for most of the proposed sites as these areas are already farmland, woodland or open green spaces.

SANGs should not be positioned near nesting birds, which will be threatened by the pet cats and dogs resident in the new homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1545  Respondent: 8687041 / Michael Aaronson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

I OBJECT to the irresponsible application of the SANG concept in this Policy and in the Plan as a whole. Allowing developers to claim that taking over previously productive farmland or ecologically valuable woodland and calling it SANG justifies building on nearby green field sites is a travesty of what the SANG concept is intended to achieve. The net result is a degradation of the existing environment without any meaningful mitigation of the risk to the THBSPA, as increased numbers of dog walkers and others will prefer to use the latter rather than an artificially constructed so-called 'suitable alternative'. This really is a shockingly cynical approach.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1073  Respondent: 8687265 / Dagero Ltd (David Roberts)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
POLICY P5 - Thames Basin Heath Special Protection Areas

I OBJECT. This policy is weak. The mitigation (cash compensation) offered for development in the special protection area is so small as to be meaningless.

SANG (Suitable Alternative Natural Greenspace) is not beneficial since the sites identified or targeted are already green space. This is just using agricultural or wooded land as recreation land in order to justify building on other green spaces nearby. There is no actual increase in open space or environmental protection; instead, it is a ploy designed to permit building on otherwise protected areas. SANG – in part used to prevent dogs and cats attacking nesting birds – must also ensure that it is not using land which is adjacent to the Special Protection Areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2625  Respondent: 8693153 / Vicki Willetts  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY P5 (THAMES BASIN HEATH S.P.A.): • Compensation mechanism too feeble to provide protection. • Cynical encouragement of SANG to justify nearby development in protected areas. Does not extend protection or amount of green space, and can damage them (e.g. dog and cat attacks on wildlife).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8887  Respondent: 8694369 / Nicola Ogilvie Smals  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Much of development around West Horsley is within 5km from the SPA boundary. The infrastructure and delivery plan includes the re-designation of ‘Bens Wood’ in West Horsley (north) to SANG space (SANG 9). It is not clear on what basis this re-designation has or will occur. The wood is already well used by the existing local community and will not therefore attract new residents away from the Thames basin SPA. It is not permissible to re-designate the area as SANG without undertaking a full assessment of the current usage and therefore any additional capacity to meet the requirements of any new developments for SANG can not be assumed.

In accordance with policy P5, SANG is to be provided at a minimum of 8ha/1000 residents, assuming 2.4 per dwelling equates to over 10ha for all the developments in Horsley, and these must be operational before occupation in order to minimise pressure on the SPA. As such, even if Bens Wood were to be re-designated as SANG following a full assessment, the size of this area would be insufficient for the proposed scale of development. I suspect this wood is in the ownership of and managed by the owners of Manor House farm and current usage is via permitted access which would not allow the land to be reclassified as SANG unless secured in perpetuity. The wood was established as public amenity space within funding from the EU and DEFRA.
It is noted that the Draft Guildford Borough Infrastructure Delivery Plan 2016 refers to a SANG on Long Reach of 24 Ha. This is also referred to as SANG8 in the plan. This would require change of use from agricultural land, which is currently graded as good. The SANG would significant upgrades to the existing infrastructure. The increase in road traffic, combined with the increase as a result of the proposed developments would significantly alter the character of the area thus conflicting with the NPPF. There is no significant mention of any infrastructure improvements in the Local Plan which does not therefore allow the proposal to be critically appraised as part of this process.

In addition the I4 Green infrastructure policy appears to require the preservation of local habitat which will be destroyed as a result of the removal of the village of West Horsley from the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<td>Strongly Object to Car Parking on Effingham Common, due to having its own protected species.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<th>Respondent: 8723809 / Sally Blake</th>
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<td>I object to POLICY P5 - Thames Basin Heath Special Protection Areas</td>
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<td><strong>Policy P5 Thames Basin Heaths Special Protection Area</strong></td>
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<td>The creation of S.A.N.G. by the council is a deceptive scheme to enable them to comply with regulations to justify development; in many cases the areas allocated to this use are areas of green space already, e.g. the proposed S.A.N.G. in Frog Grove Lane, and offer no improvement to the environment or biodiversity.</td>
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<tr>
<td><strong>Object</strong></td>
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<td>This looks like an exercise in creating SANGs to justify using agricultural or wooded land as recreation land in order to justify building on other green spaces. There is no actual increase in environmental protection, and actually a reduction in Biodiversity.</td>
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<tr>
<td>This policy is weak and pointless. The Waddenzee judgement must be applied. As per paragraph 21 of Planning Circular 06/2005.</td>
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<tr>
<td>SANG (Suitable Alternative Natural Greenspace) is not beneficial as the sites identified or targeted are already greenspace. Site designation shows how little logic applied (for example 900 Houses in Ash cannot be mitigated by a SANG in Wood Street Village).</td>
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<th>Comment ID: pslp171/2051  Respondent: 8729217 / Karen Stevens  Agent:</th>
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<tr>
<td><strong>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P5</strong></td>
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<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
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<td><strong>I support the addition of paragraph 4.3.50a, which recognises contribution of Special Protection Areas (SPAs) and Areas of Special Conservation Interest in meeting the UK’s international agreements and treaties. However, I object to the insertion of a new paragraph 4.3.50c, which states “... if residential developments provide or contribute to appropriate SANG and SAMM measures, they will not be required to undergo Appropriate Assessment.” It is not sufficient mitigation against harm to the SPA to merely allocate land as SANG or to contribute to SAMM measures. There is no evidence that SANGS actually alleviate pressure on the SPAs and, without this, it is irresponsible to plan large-scale developments within 5km of them. For example, Blackwell Farm is likely to have a negative impact</strong></td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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on Whitmoor Common (Guildford’s primary SPA) and Pirbright Common SPA, even with bespoke SANG provision, for the following reasons:

• The centre of the site is within 5km of the centre of Whitmoor Common and 3.8km to the nearest boundary point. It is highly likely that additional recreational pressure will be put on Whitmoor and Pirbright Commons as a result of the quantity of dwellings proposed (1,800). Even if only 5% of households use the SPAs, that is an increased recreational pressure of 90 households and this is without considering the combined recreational pressures caused by all planned sites.

• The Habitats Regulations Assessment also notes that the Blackwell Farm site “could contribute to reduced air quality through traffic movements past Thames Basin Heaths SPA in combination.” (Page 37)

The Surrey Wildlife Trust describes the Thames Heath lowland heaths as a rarer habitat than rainforest. They are home to large numbers of rare insects, rare amphibians, rare plants, and rare bats – in addition to the EU protected Dartford warbler and nightjar. It is irresponsible to plan for development which does not safeguard this habitat.

It should further be noted that many local residents on the west of Guildford, including Flexford, Park Barn, Onslow Village and Wood Street village currently use Blackwell Farm as an area to walk dogs (one of the biggest threats to ground-nesting birds). It is possible that these people might encroach on the SPA instead, if Blackwell Farm was to become urbanised.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  KJS 2017 consultation response (rev 01F).pdf (7.6 MB)


Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy P5 Blue Policy Box

I object to all changes of text in the blue policy box of Policy P5. The changes set out to deliberately weaken assessment of development proposals within the mitigation zone of the Special Protection Area. The only remedy should be mitigation, not avoidance. Mitigation requires a commitment from the council and any applicant to provide either land as SANG or an S.106 payment. A programme of SAMM activity has no proven benefit. Natural England can provide no evidence that SAMM activity has any impact on visitor behaviour to the SPA, therefore it cannot support an avoidance strategy. The only protection therefore is mitigation.

I propose all references to "avoidance" and "SAMM" activity should be removed from Policy P5 and its Definitions in pp65-69.

I propose the text in the blue policy box for Policy P5 should be as follows:

“POLICY P5: Thames Basin Heaths Special Protection Areas

(1) Permission will not be granted for development proposals unless it can be demonstrated that doing so would not give rise to adverse effects on the ecological integrity of the Thames Basin Heaths Special Protection Area (SPA), whether alone or in combination with other development. Where one or more adverse effects on the SPA are likely, measures to avoid and mitigate these effects must be delivered and secured in perpetuity. These measures must be agreed with Natural England.

(2) The following principles apply:
(a) There is an “exclusion zone” set at 400m linear distance from the SPA boundary. Permission will not be granted for development that results in a net increase in residential units within this zone. Proposals for other types of development within this zone must undertake Appropriate Assessment to demonstrate that they will not harm the integrity of the SPA.

(b) There is a “zone of influence” between 400m and 5km linear distance from the SPA boundary. Where net new residential development is proposed within the zone of influence, mitigation measures must be delivered prior to occupation of new dwellings and in perpetuity. Measures must be based on the provision, improvement and/or maintenance of Suitable Alternative Natural Greenspace (SANG).

(c) Residential development of at least 50 net new dwellings that falls between five and seven kilometres from the SPA may be required to provide mitigation measures. This will be assessed on a case-by-case basis and agreed with Natural England.

(3) The following principles apply to the provision of SANG:

(a) A minimum of 8 hectares of SANG land (after discounting to account for current access and capacity) should be provided per 1,000 new occupants.

(b) Developments must fall within the catchment of the SANG that provides mitigation, except developments of fewer than 10 net new residential units.

(c) The Council will collect developer contributions towards mitigation measures, including SANG (unless bespoke SANG mitigation is provided).

(d) Developments may secure or provide bespoke SANG. Proposals for new SANGs will not be acceptable unless approved by Natural England. Large developments may be required to provide bespoke SANG mitigation.

(4) Where further evidence demonstrates that the integrity of the SPA can be protected using different linear thresholds or with alternative mitigation measures (including standards of SANG provision different to those set out in this policy) these must be agreed with Natural England.”

Para 4.3.50c

I object to the insertion of paragraph 4.3.50c, page 66. All proposed developments within the up-to-7km mitigation zones of the SPA should undergo Appropriate Assessment irrespective.

I propose the complete removal of paragraph 4.3.50c.

Para 4.3.52

I object to the change in paragraph 4.3.52, p67 where the word “impacts” is removed and replaces by the word “pressures”. I propose the reversion to the word “impacts”.

Para 4.3.53

I object to the removal of paragraph 4.3.53, page 67. This paragraph provides strong determination of the need for Appropriate Assessment of all applications for planning permission in the SPA exclusion zone.

I propose the reinsertion of paragraph 4.3.53 as follows:

"Applications for planning permission for all development in the exclusion zone should be subject to a full Appropriate Assessment to demonstrate no adverse effect on the SPA and/or the acceptability of any avoidance measures provided."

Para 4.3.54
I object to the removal of the following text from paragraph 4.3.54 "ensure that new residential development will not lead to increased recreational pressure on the SPA" and its replacement by "avoid this impact". The substitute text is weak and requires no assessment of impact by the council.

I object to the insertion of the following text into paragraph 4.3.54 "and other types of permanent accommodation not listed in paragraph 4.3.51" as this presents an open door for any type of housing development to be considered for the SPA exclusion zone that might have a severe impact via disturbance and invasion on the protected species and habitat. Paragraph 4.3.51 is now very specific as to the allowable accommodation types, intended to deliver close control over potential impacts on the SPA.

I object to the replacement of the word "mitigation" in paragraph 4.3.54 with the word "avoidance" for previously defined reasons. The word "avoidance" should be removed and revert to "mitigation".

I propose paragraph 4.3.54, page 67 should revert as follows:

"In the zone of influence, beyond the exclusion zone and up to 5km (linear) from the SPA, a net increase in the number of residential units is likely to lead to increased recreational use of the SPA visitor surveys produced by Natural England demonstrate that 70 per cent of visitors to the SPA come from within this distance. In order to ensure that new residential development will not lead to increased recreational pressure on the SPA, net new residential development must secure or provide Suitable Alternative Natural Greenspace (SANG). Proposals for student accommodation may not need to provide mitigation and mitigation measures. This will be assessed on a case by case basis."

Para 4.3.55 I object to the substitution of the phrase "at least" with the word "over" in paragraph 4.3.55, page 67. I propose the word "over" revert to the phrase "at least"

Para 4.3.56 I object to the replacement of the word "mitigation" in paragraph 4.3.56, page 67 with the word "avoidance" for previously defined reasons. I propose the word "avoidance" should be removed and revert to "mitigation".

Para 4.3.57 I object to the replacement of the word "mitigate" with the word "avoid" and the word "mitigation" with the word "avoidance" in paragraph 4.3.57 for previously defined reasons. I propose the words "avoid" and "avoidance" should be removed and revert to "mitigate" and "mitigation" respectively.

Para 4.3.58 I object to the replacement of the word "mitigation" in paragraph 4.3.58, page 68 with the word "avoidance" for previously defined reasons. I propose the word "avoidance" should be removed and revert to "mitigation".

Para 4.3.60 I object to the replacement of the word "mitigation" in paragraph 4.3.60, page 68 with the word "avoidance" for previously defined reasons. I propose the word "avoidance" should be removed and revert to "mitigation". I object to the word "agreed" in the same paragraph. I propose the word "agreed" should revert to "approved".

Para 4.3.64 I object to the replacement of the word "mitigation" in paragraph 4.3.64, page 68 with the word "avoidance" for previously defined reasons. I propose the word "avoidance" should be removed and reverted to "mitigation".

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2358  Respondent: 8806305 / Laurence Cook  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY P5 - Thames Basin Heath Special Protection Areas

I OBJECT. This policy is weak. The mitigation (cash compensation) offered for development in the special protection area is so small as to be meaningless.

SANG (Suitable Alternative Natural Greenspace) is not beneficial since the sites identified or targeted are already green space. This is just using agricultural or wooded land as recreation land in order to justify building on other green spaces nearby. There is no actual increase in open space or environmental protection; instead, it is a ploy designed to permit building on otherwise protected areas. SANG – in part used to prevent dogs and cats attacking nesting birds – must also ensure that it is not using land which is adjacent to the Special Protection Areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17045  Respondent: 8825057 / Merrow Residents' Association (Keith Meldrum)  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy P5 - Thames Basin Heaths Special Protection Area

This policy will have to be reviewed in the context that it follows European Union Directives 92/43 and 79/409 which may be revoked when the European Communities Act is revoked unless it is replaced with less onerous and more flexible UK legislation to protect certain ground nesting birds. The present regime is a blunt implementing instrument and needs to be refined.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3713  Respondent: 8828417 / Valerie Wild  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Attached documents:
Policy PS - Thames Basin Heath Special Protection Areas

OBJECT. The whole SANG concept is deeply flawed. There is a fundamental requirement in European law that developers and the Council must have convincing, objective evidence that developments have no adverse impact on the SPA (Waddenzee judgement, case no: C-127-02). This does not appear to have been done for a number of sites. The SANGs put forward are mostly already in public use, further away from the planned developments, and irredeemably less attractive than the sandy heaths of Whitmoor Common. This is even more important with the hugely expanding housing being proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16610  Respondent: 8835873 / Effingham Residents' Association (Vivien White)  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy P5

We support this policy but believe that all Suitable Natural Alternative Green Spaces (SANGs) must be new green space and not just a redesignation of existing green space which already has public access, as this is a misuse of the policy which is to mitigate against damage to Special Protection Areas (SPAs).

In this regard, Effingham Common was designated a SANG some years ago, although it is registered common land which already had public access. Since it has been registered as a SANG there has been a decline in its important skylark population. This appears to be due to an increase in dog walkers (including some professional) and its management as recreational space instead of as a local nature reserve, which we believe would be a more appropriate designation, and which would encourage wildlife.

There was a proposal in the last draft of the Plan to increase the capacity of the SANG at Effingham Common by building a car park, even though it is illegal to build on common land. Our survey in August 2014 showed that 97% of Effingham respondents were against this. We trust that GBC will respect the status of Effingham Common and that any SANGs required will be located on new green space.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15766  Respondent: 8836129 / Roger Shapley  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

This policy is weak. The mitigation (cash compensation) offered for development in the special protection area is so small and negligible as to be meaningless. SANG (Suitable Alternative Natural Greenspace) is not beneficial; the sites identified or targeted are already green space.

To create SANG is just using agricultural or wooded land as recreation land in order to justify building on other green spaces.
There is no actual increase in environmental protection; it is a policy designed to permit building on otherwise protected areas. SANG – in part used to prevent dogs and cats attacking nesting birds - must ensure that it is not using land which is adjacent to the special protection areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/16930  **Respondent:** 8837729 / Harry Clarke  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

1. Policy P5 – object
   1. Whilst I support the policy in principal, there is inappropriate designation of land as SANGs which do not provide mitigations to new developments.
   2. SANGs must be provide new green space, rather than designate land that already has public access as a SANG. In this respect it is inappropriate for the designation of Effingham Common as a SANG as it is already a registered Common, and people already have access to the land, so it is not in any way providing any mitigation for new developments to Wisley and Ockham Commons.
   3. Para 4.3.58. The catchment area for a SANG based solely on size and distance is nonsensical. The catchment area for any site is based on accessibility and attractiveness. A muddy site, with poor access in the middle of winter will divert visitors away to a drier site with better access.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/18183  **Respondent:** 8843361 / Adrian Atkinson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

**I object** to policy P5 Thames Basin Heath Special Protection Areas This policy is weak. The mitigation for damage for the protected areas in the form of cash compensation offered by developers is insulting to our ecology and our duty to protect the environment – it’s blood money. There is no actual increase in open space or environmental protection; instead, it is a ploy designed to permit building on otherwise protected areas. SANG – in part used to prevent dogs and cats attacking nesting birds – must also ensure that it is not using land which is adjacent to the Special Protection Areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/5343  **Respondent:** 8846849 / David Berliand  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

I object to policy P5 Thames Basin Heath Special Protection Areas This policy is weak. The mitigation for damage for the protected areas in the form of cash compensation offered by developers is insulting to our ecology and our duty to protect the environment – it’s blood money. There is no actual increase in open space or environmental protection; instead, it is a ploy designed to permit building on otherwise protected areas. SANG – in part used to prevent dogs and cats attacking nesting birds – must also ensure that it is not using land which is adjacent to the Special Protection Areas.
I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1957  Respondent: 8848033 / Paul Gerrard  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( No )

I strongly object to the implementation of SANGs and SAMM, since there is quite simply no historical evidence base to support their continued use, and therefore any development relying on them as mitigation does not comply with the Conservation of Habitats and Species Regulations 2010/EC Habitats Directive, the retained SE Plan Policy NRM6 viii (monitoring), NPPF paragraph 2 "Planning policies and decisions must reflect and where appropriate promote relevant EU obligations and statutory requirements", and NPPF paragraph 7 which lays out the requirement for environmentally sustainable development. Presumably this would not satisfy the legal requirements of the independent inspector (NPPF 182), and would leave the Council exposed to legal challenge as clarified by the Waddenzee judgement. ODPM 06/2005 circular BIODIVERSITY AND GEOLOGICAL CONSERVATION – STATUTORY OBLIGATIONS AND THEIR IMPACT WITHIN THE PLANNING SYSTEM states: "In the Waddenzee judgment, the European Court of Justice ruled that a plan or project may be authorised only if a competent authority has made certain that the plan or project will not adversely affect the integrity of the site. That is the case where no reasonable scientific doubt remains as to the absence of such effects'. Competent national authorities must be 'convinced' that there will not be an adverse affect and where doubt remains as to the absence of adverse affects, the plan or project must not be authorised, subject to the procedure outlined in Article 6(4) of the EC Habitats Directive regarding imperative reasons of overriding public interest."

SANGs appear to have become nothing more than a risky pseudo-scientific number-crunching excuse to circumvent the rules and build first, ask questions later. As far as I can see they have no basis in law, even though they are being used as some sort of legal loophole. They are based entirely on wishful thinking rather than fact, no independent evidence has been provided to demonstrate they work as hoped, and no scientifically sound monitoring has yet been published to this end, despite the Regulations first being implemented in UK law in 1994 and this strategy (and a similar interim one previously) being in place since 2006. Where, for example, is the evidence base that led to the introduction of this strategy in the first place? Where was it trialled? And where is the monitoring of avoidance/mitigation success proposed in 2008 in the Thames Basin Heaths SPA Avoidance Strategy section 5.1? The only "monitoring" of which I am aware are:

- Firstly, simple visitor counts at SANGs in the Council's Annual Monitoring Reports, which have no scientific basis at all since
  (a) they do not take any variable factors into account (probably most importantly weather and site condition);
  (b) are bypassed completely for sites during years where no improvement works were carried out (why?);
  (c) have only been undertaken every 2 years since 2009 because "changes in visitor levels are unlikely to be significant from year to year" (doesn't this indicate SANGs aren't working?);
  (d) are not linked to any corresponding SPA research.

- Secondly, Natural England's SPA visitor survey report NECR136 2014. Although this conversely appeared to reflect a 10% increase in total visitor numbers to the areas supposedly under protection, it was conveniently not deemed "statistically significant", and in any case section 4.17 admits "These survey results in no way test whether Suitable
Alternative Natural Greenspace (SANG) provision or other measures may have been successful, and detailed monitoring of SANGs themselves is necessary to show their effectiveness.

As such, these surveys do not meet the requirements of the Joint Strategic Partnership (JSP) Board, and have no significance. Since SPAs are protected by law, and since there has already been plenty of opportunity to undertake a study, this appears to demonstrate extraordinary negligence on the part of the local councils and Natural England. According to Natural England, a research report was commissioned in 2015, but this is still at draft stage and therefore not appropriate for decision-making. Whatever its conclusions, though, it all seems too late, and will surely have little validity as evidence right now, as its time span will be too short to analyse visitor patterns. It is not adequate to propose a proper analysis will be done at some time in the future, since this does not prevent potentially irreversible damage now and in the immediate future if the wholesale roll-out of the avoidance scheme in the Local Plan is adopted. We can hardly ostracize other countries on saving endangered animals, preserving rainforest, protecting indigenous tribes etc etc etc, when we can't even look after what's left of our own tiny patches of easily maintainable, non-threatening biodiversity.

If, however, I am mistaken and relevant evidence and monitoring now exists of which I am not aware, the Council should make clear reference to it in its Evidence Base.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2212  Respondent: 8848033 / Paul Gerrard  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( No )

4.3.54 “Proposals for student accommodation may not need to provide mitigation and avoidance measures.” I object. Why not? Shouldn’t this be backed up by evidence?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2214  Respondent: 8848033 / Paul Gerrard  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Monitoring Indicators. Surely SAMM should be included in this table, as it is supposed to monitor if this policy actually works.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1115  Respondent: 8848033 / Paul Gerrard  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( No )
4.3.50c “However, if residential developments provide or contribute to appropriate SANG and SAMM measures, they will not be required to undergo Appropriate Assessment.”

I object. Surely such developments must still undergo Appropriate Assessment if that is what the Habitat Regulations require. Any SANG/SAMM, or other alleged mitigation, should be part of that assessment, not instead of it, to ensure it is adequate and complies with the law.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Correct policy to undertake an Appropriate Assessment on any development likely to have a significant effect, regardless of mitigation/avoidance method, if that is what the Habitat Regulations require by law.

Attached documents:

Comment ID: PSLPP16/3199  Respondent: 8850433 / Ian Doherty  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P5
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I support this policy

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13328  Respondent: 8850945 / Richard Bayes  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P5
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY P5: Thames Basin Heath Special Protection Areas

I support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1799  Respondent: 8855201 / Catherine Harding  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P5
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

This refers to development within the zone of influence and the provision of “avoidance and mitigation measures” to avoid harm. However the measures proposed, namely, Alternative Natural Green Space (SANG) and Strategic Access Management and Management, (SAMM) do not work. There is no evidence that it does.
All proposed developments should be subject to assessment to ensure the protection of this unique landscape.

However, SANGS do not work. Cats will adhere to their established territory and people seeking recreation and walking routes for dogs will not drive to an alternative space (SANG) and will continue to walk where they have always done so, (this is human nature). Moving populations of wild species may seem to be attractive in terms of public relations, but also will not work; Birds will try to return to traditional nesting areas. Amphibians will also try to walk back to their traditional breeding sites. Therefore, building on the SPA or within the zones of exclusion and influence will only serve to destroy local populations which are rare and declining.

The SPA is also subject to European Legislation. Directive 92/4/EEC requires that member states maintain certain natural habitats and wild species. It also requires them to take into account areas of regional and local importance. The SPA is part of a European Ecological Network of protected sites which constitute the NATURA 2000 Network (Article 3). Birds reported in this area include greater spotted woodpecker, wood pigeon, nightjar, osprey (summer 2017), peregrine, red kite, short-toed eagle (summer 2014), sparrow hawk, woodpigeon, wren; red list birds also include house sparrow and starling.

In addition to, and related to this, the EU 2020 Biodiversity Strategy has six targets one of which is “full implementation of EU nature legislation to protect biodiversity and better protection for eco systems, and more use of green infrastructure”[1][2].” This is pertinent to this part of the Southeast because the EU has adopted this strategy to halt the loss of biodiversity and ecosystems, which, of course, includes biodiversity which is being lost due to development. Biodiversity loss has huge consequences in that one in four species is currently threatened with extinction and areas like that covered by the local plan, which have the privilege of housing these species, have a duty to protect them. Therefore the SPA, and areas of Greenbelt and ANOB must be protected; full implementation of the EU Birds and Habitats Directives is essential if we are to meet the targets of the EU 2020 Biodiversity targets.

- Incidentally, The UN has designated 2010 – 2020 the decade of Biodiversity.

Wadenzee Judgement with regard to the SPA

In conclusion, I would like to reiterate the fact that all sites in the Draft Plan are so close to the SPA that they fall within the zone of influence or the exclusion zone, and refer you to the Wadenzee Judgement in which the European Court of Justice ruled that any plans or project may only be authorised if a competent authority has made certain that it will not adversely affect the integrity of the SPA in that no reasonable scientific doubt remains as to the absence of such effects. Therefore, unless you are absolutely certain that the Plan will not cause harm to the SPA, it should not be authorised.

[1][2] EU Biodiversity Strategy to 2020 – towards implementation

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to this policy. This policy is extremely weak.

The mitigation (cash compensation) offered for development in the special protection area is so small and negligible as to be meaningless.

SANG (Suitable Alternative Natural Greenspace) is not beneficial; the sites identified or targeted are already green space.

To create SANG is just using agricultural or wooded land as recreation land in order to justify building on other green spaces.

There is no actual increase in environmental protection; it is a policy designed to permit building on otherwise protected areas. SANG – in part used to prevent dogs and cats attacking nesting birds - must ensure that it is not using land which is adjacent to the special protection areas.

Thames Basin Heaths Special Protection Area (TBH SPA; see Map 1, Appendix 1), is a statutory designated site and designated for its rare and vulnerable birds, specifically nightjar, Dartford warbler and woodlark under the EC Birds Directive. This site also forms part of the Thursley, Ash, Pirbright and Chobham Special Area of Conservation (SAC), a statutory designated site and designated for its North Atlantic wet heaths, European dry heaths and peat bogs.

We believe that the Plan is unsound as the Habitats Regulations Assessment prepared for GBC does not take sufficient account of the impact seven proposed developments will have upon the Thames Basin Heaths Special Protection Area (TBH SPA) which is a European Site (as defined under the Habitats Directive and Conservation of Habitats and Species Regulations 2010 (as amended).

The seven proposed developments are less than five kilometres away from the TBH SPA and in some cases not much beyond the 400m exclusion zone, occupying an area between under 1km to just over 2km from the TBH SPA. It has been indicated that the cumulative effect of further residential development up to 5 km from protected heathlands will have a significant adverse effect on the heaths. The TBH SPA is an internationally important habitat for three rare species of bird - the Dartford warbler, woodlark and nightjar. The latter two are ground nesting and therefore particularly susceptible to disturbance from people and animals. In fact Natural England believes that recreational use of the heaths arising from housing developments up to five kilometres away from a SPA will create disturbance to rare bird populations.

A survey in 2008 showed that more than 83% of visitors to the SPA arrived by car and that 70% of those had come from within 5km of its access point. A very large proportion of the TBH SPA visitors are dog walkers, many of whom visit a particular site on a regular basis. A follow-up survey in 2012 found that there was a 10% increase in visitors to the SPA.

A survey of households carried out by a veterinary team at Bristol University in 2010 “Number and ownership profiles of cats and dogs in the UK” published in the Journal of The British Veterinary Association indicates 31% households own dogs and 26% households own cats. Dogs were more likely to be owned by rural households.

Applying this analysis for all new housing at the listed strategic housing sites in the draft Local Plan within the 400m-5km mitigation zone of TBHSPA (in total 7,000 new homes), the cumulative impact of dog ownership (up to an estimated 2,200 new dogs within 5 km of TBHSPA) with dog-walker incursions on the rare bird species habitat of the TBHSPA will be a devastating increase. No amount of SANG nor SAMM programmes will change human behaviour and the draft Local Plan evidence base contains no studies or data to prove otherwise, it contains only unproven assertions. Natural England can provide no survey evidence of the effectiveness of SANG or SAMM programmes in attracting dog-walkers and other visitors away from TBHSPA.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy P5 - Thames Basin Health Special Protection Areas

I object. Suitable Alternative Green Space is not beneficial as they are already green spaces and is being used to justify development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to this policy. This policy is weak.

The mitigation (cash compensation) offered for development in the special protection area is so small and negligible as to be meaningless.

SANG (Suitable Alternative Natural Greenspace) is not beneficial; the sites identified or targeted are already green space.

To create SANG is just using agricultural or wooded land as recreation land in order to justify building on other green spaces.

There is no actual increase in environmental protection; it is a policy designed to permit building on otherwise protected areas. SANG – in part used to prevent dogs and cats attacking nesting birds - must ensure that it is not using land which is adjacent to the special protection areas.

Thames Basin Heaths Special Protection Area (TBH SPA; see Map 1, Appendix 1), is a statutory designated site and designated for its rare and vulnerable birds, specifically nightjar, Dartford warbler and woodlark under the EC Birds Directive. This site also forms part of the Thursley, Ash, Pirbright and Chobham Special Area of Conservation (SAC), a statutory designated site and designated for its North Atlantic wet heaths, European dry heaths and peat bogs.

I believe that the Plan is unsound as the Habitats Regulations Assessment prepared for GBC does not take sufficient account of the impact seven proposed developments will have upon the Thames Basin Heaths Special Protection Area (TBH SPA) which is a European Site (as defined under the Habitats Directive and Conservation of Habitats and Species Regulations 2010 (as amended).

The seven proposed developments are less than five kilometres away from the TBH SPA and in some cases not much beyond the 400m exclusion zone, occupying an area between under 1km to just over 2km from the TBH SPA. It has been indicated that the cumulative effect of further residential development up to 5 km from protected heathlands will have a significant adverse effect on the heaths. The TBH SPA is an internationally important habitat for three rare species of bird - the Dartford warbler, woodlark and nightjar. The latter two are ground nesting and therefore particularly susceptible to disturbance from people and animals. In fact Natural England believes that recreational use of the heaths arising from housing developments up to five kilometres away from a SPA will create disturbance to rare bird populations.
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
to permit building on otherwise protected areas. SANG – in part used to prevent dogs and cats attacking nesting birds –
must also ensure that it is not using land which is adjacent to the Special Protection Areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12607  Respondent: 8894657 / Jacob's Well Residents' Association (Janet Smith)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

I support measures which protect this precious habitat.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14756  Respondent: 8896161 / Carol Wilson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Policy P5: Thames Basin Heath Special Protection Area

I object to SANGs as they are just a way round getting developments where they should not occur. Designating a piece
of green space differently does not change anything.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4418  Respondent: 8897377 / Jan Jewers  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

4. I object to insufficient consideration of the Thames Basin SPA, SSSI, SNCI sites and conservation areas

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5686  Respondent: 8901921 / Diana Ashby  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

11) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site 35, in relation to the Thames Basin Heath Special Protection Area (SPA), the Sites of Special Scientific Interest and Special Nature Conservation Interest. We should not destroy the habitat of threatened ground nesting birds like the Skylark and the Nightjar.

12) I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction is in excess of statutory levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents as well as the SPA.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8153    Respondent: 8902465 / Linda Slater    Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

I OBJECT TO POLICY P5 (THAMES BASIN HEATH S.P.A.):

- Cynical encouragement mechanism too feeble to provide protection.
- Cynical encouragement of SANG to justify nearby development in protected areas. Does not extend protection or amount of green space, and can damage them (e.g. dog and cat attacks on wildlife).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1459    Respondent: 8904161 / Geoffrey & Lesley Tregaskes    Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

I object to the environmental and ecological value of the area, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI) being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9452    Respondent: 8915073 / Alastair Lawson    Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Site A46 is situated under 1000m from the TBH SPA and is surrounded by at least four SSSIs. The development will threaten this protected area and the LP fails to highlight the damage it will do. The impact of increased pollution, human disturbance and environmental damage has not been clearly researched. Just dog walking alone will contribute greatly to the threat of harm to the SPA and the provision of SANG land will not take away this as people would prefer to walk in the pretty natural green space rather than a manufactured area. GBC have not recognised that an increase of houses in this magnitude will bring at least 150 cats and 250 dogs (based on average ratio of animals to houses) to cause this problem.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1431  Respondent: 8917665 / Frances Porter  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P5
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to POLICY P5 - Thames Basin Heath Special Protection Areas. The plan is not strong enough to protect these areas from detrimental development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1211  Respondent: 8925153 / D B Saidman  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P5
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5728  Respondent: 8928161 / Jan Brophy  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P5
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the fact that insufficient consideration has been given to the environmental and ecological value of the FWA/TFM site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU permitted level Additional traffic will exacerbate this
situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

I object to the fact that the proposed plan does not meet the needs and desires of local communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16045</th>
<th>Respondent: 8941761 / FLGCA (Paul Kassell)</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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</table>

6.5 P5 Thames Basin Heath SPA

FLAG objects very strongly to this policy. The protection of our habitats is of prime concern and this policy is weak and completely ineffective.

The objective of the policy is to prevent additional footfall on protected areas and particularly to prevent cats prowling from their home or an increase in dog walking. We believe this council is intent on paying lip service to the protection of our Thames Basin Heaths without determining whether any mitigation is effective.

Firstly, this is done by not allowing residential development within 400 metres of the Special Protected Area or SPA. However this Council believes that it can build a residential care home in this protected buffer – (in previous iterations of the plan there was a secondary school within 50 metres, completely ignoring students using to common to get to and from the school as well as using the SPA for recreation. We believe this was only rejected as Surrey County Council pointed out that access by foot and by road would be dangerous).

Secondly, between 400 metres and 5 kilometres the submission states:

In the zone of influence, beyond the exclusion zone and up to 5km (linear) from the SPA, a net increase in the number of residential units is likely to lead to increased recreational use of the SPA as visitor surveys produced by Natural England demonstrate that 70 per cent of visitors to the SPA come from within this distance. In order to ensure that new residential development will not lead to increased recreational pressure on the SPA, net new residential development must secure or provide Suitable Alternative Natural Greenspace (SANG) and provide funding for Strategic Access Management and Monitoring (SAMM). Proposals for student accommodation may not need to provide mitigation and avoidance measures. This will be assessed on a case by case basis.

Note that the 2012 / 2013 visitor survey identified that 75% of visitors to Whitmoor Common travelled 2.8 kilometres or less. This is well below the 5 kilometres average used to define the zone of influence. Salt Box car park recorded the second highest number of visitors of all the survey counts and the highest number of dogs. A SANG must attract people away from the SPA to be effective. Either that or people who currently visit Whitmoor Common must be displaced and visit another site. The argument that people are going to travel longer distances to visit a SANG is clearly flawed. Additionally 30% of those surveyed said that nothing would persuade them to visit another site. If you also add 13% who said they would move for a larger open space and 12% if the other site was nearer home, it cannot be argued that a SANG sited that is smaller than Whitmoor Common and sited further away can be effective.

FLAG cannot agree that student accommodation should not provide any mitigation – are students not going to visit the common (jogging and cycling are common activities).

In terms of monitoring, there is absolutely nothing that measures the effectiveness of this policy. Reduced or static visitor numbers would be a minimum expectation. Measuring the amount that developers contribute towards a SANG is an example of paying lip service to protecting our environment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the fact that insufficient consideration has been given to the harm caused by over-development to the Special Protection Area, the Sites of Special Scientific Interest and the borough’s Conservation Area and heritage assets. There appears to be no notice taken of the NPPF which specifically does NOT call for the presumption in favour of sustainable development to be engaged where the Birds Directive is engaged. This covers a huge proportion of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17223  Respondent: 8944929 / A Jefferies  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the fact that the impact of poor air quality on the Special Protection Area is not properly taken into account. There is no evidence that the impact of nitrogen and acid deposition on the heathland and the consequent degradation of the heathland has been taken into account. Please see the attached document by Baker Consultants specifically in response to the planning application almost identical to policy A35 which is relevant for ALL SITES WHICH ARE CLOSE TO THE SPA.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9371  Respondent: 8948385 / Gillian Eve  Agent:

Policy P5: Thames Basin Heaths Special Protection Area

I OBJECT. The policy is weak. The mitigation (cash compensation) offered for development in the vicinity of the special protection area is so small as to be meaningless.

SANG (Suitable Alternative Natural Greenspace) is not beneficial since the sites identified or targeted are already green space. There is no actual increase in open space or environmental protection; instead, it is a ploy designed to permit building on otherwise protected areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16158  Respondent: 8948385 / Gillian Eve  Agent:
I OBJECT. The policy is weak. The mitigation (cash compensation) offered for development in the vicinity of the special protection area is so small as to be meaningless.

SANG (Suitable Alternative Natural Greenspace) is not beneficial since the sites identified or targeted are already green space. There is no actual increase in open space or environmental protection; instead, it is a ploy designed to permit building on otherwise protected areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/17300</th>
<th>Respondent: 8967233 / University of Surrey (University of Surrey)</th>
<th>Agent: Terence O'Rourke (Luke Vallins)</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P5</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The University accepts the purpose of this policy, which looks to ensure the long term protection of the Thames Basin Heaths Special Protection Area (SPA). The University provides further comments specifically in relation to the allocation at Blackwell Farm (Policy A26).

Paragraph 4.3.51

Of particular relevance to the University with regard to potential impacts on the integrity of the Thames Basin Heath SPA, paragraph 4.3.51 includes student accommodation within the definition of residential development.

The University does not dispute that student accommodation may have some impact on the SPA, but this impact is not in the least bit comparable to the impact of other types of residential accommodation, such as standard dwellings. For example:

- University policy precludes students from bringing cars onto any of its campuses and the University operates a robust parking management system that ensures that unauthorised parking is strictly controlled.
- The occupancy conditions of University accommodation preclude students from keeping any type of pets on campus. It is made very clear in University policy to all students with on-campus accommodation that pets are not permitted. In the unlikely event that a student did bring a pet into the accommodation the University would robustly enforce this restriction.
- The majority of students are likely to participate in recreational activities that are located either at the Manor Park or Stag Hill campuses, in Guildford town centre, or the immediate local area. This is partly because of reduced mobility arising from restrictions on car parking but also because the University has extensive outdoor sport and recreational facilities available on the Manor Park campus that are easily accessible to the existing and new student residences.
- All students benefit from the first class sporting facilities provided by the Surrey Sports Park, that include a range of outdoor playing fields. In addition, there are informal amenity spaces available across both campuses that provide other alternative recreational resources. Across Stag Hill and Manor Park campuses there are some 11 ha of informal open space, grassland and ponds and around 11.5 ha of sports pitches, within open space and accessible for students to walk around.
- Whilst the University accepts that theoretically some students could visit the SPA by a combination of cycle and/or public transport, in practical terms given the restrictions on student car use, the distance between the University and the SPA, and the easy access to alternative recreational resources on-campus (or in the immediate area)
vicinity) the actual likelihood of students visiting the SPA in any significant numbers is considered to be very small.

The above therefore clearly shows that students and student accommodation are unlikely to impact on the SPA to the same or a similar extent as other types of residential accommodation. This is therefore a consideration that will need to be taken into account when considering any future planning applications for the development of student accommodation in Guildford, as has been the case in the University’s recent applications.

As part of the allocation at Blackwell Farm (Policy A26), the University proposes the delivery of bespoke SANG to mitigate the impacts of the development on the SPA.

Paragraph 4.3.54

With regard to potential impacts of development on the SPA, paragraph 4.3.54 explains that “Proposals for student accommodation may not need to provide mitigation and avoidance measures. This will be assessed on a case by case basis.”

The University is supportive of this text as it takes account of the points mentioned above and reflects the different impacts associated with student accommodation when compared with other residential development. This is the approach that has been taken in relation to the University’s recent applications for student accommodation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7331  Respondent: 8971233 / Tim J. Harrold  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY P5 Thames Basin Heath Special Protection Area

It is a serious mistake that GBC has not taken this constraint into account when arriving at its OAN housing figure.

CPRE has reservations as to how this policy is working but sees little prospect of any change being introduced as its wording does not really fall within local authority control. The principal difficulty is to do with the system of SANGs that has been developed and the way this is being implemented by GBC and other neighbouring districts. Many SPA sites are still being visited by dog walkers in large numbers even when SANGs are supplied, and if these are located near SPA boundaries, damage is quickly done to any ancient woodland and good agricultural land bordering the protection area such as at Blackwell Farm. We have viewed the income generated in Guildford for SANGs at Chantry Woods in the AONB and the Registered Common at Effingham. Greater transparency is required as to how this money is to be spent and where.

A key application is to be heard at Worplesdon on 20th July after a long delay as something of a test case at which a proposed SANG application will be consulted upon in the Planning Committee.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13124  Respondent: 8993121 / Shelagh Yeomans  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy P5: Thames Basin Heaths Special Protection Area

I OBJECT to this policy.

• This policy is weak. The mitigation (cash compensation) offered for development in the special protection area is so small as to be meaningless.
  ∙ SANG (Suitable Alternative Natural Greenspace) is not beneficial; the sites identified or targeted are already green space. To create SANG is just using agricultural or wooded land as recreation land in order to justify building on other green spaces.
  ∙ There is no actual increase in environmental protection; it is a policy designed to permit building on otherwise protected areas. SANG – in part used to prevent dogs and cats attacking nesting birds - must ensure that it is not using land which is adjacent to the special protection areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8674  Respondent: 9050337 / Nigel Geary  Agent:

<table>
<thead>
<tr>
<th>Document:</th>
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</table>

I support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11437  Respondent: 9062913 / Susan Parker  Agent:

<table>
<thead>
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POLICY P5: Thames Basin Heath Special Protection Areas

OBJECT. This policy is weak. The mitigation (cash compensation) offered for development in the special protection area is so small and negligible as to be meaningless.

SANG (Suitable Alternative Natural Greenspace) is not beneficial; the sites identified or targeted are already green space. To create SANG is just using agricultural or wooded land as recreation land in order to justify building on other green spaces. There is no actual increase in environmental protection; it is a policy designed to permit building on otherwise protected areas. SANG – in part used to prevent dogs and cats attacking nesting birds - must ensure that it is not using land which is adjacent to the special protection areas.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
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<tr>
<td>PSLPP16/18557</td>
<td>9079393 / Wisley Property Investments Ltd.</td>
<td>Savills (Charles Collins)</td>
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<tr>
<td>Policy P5: Thames Basin Heaths SPA</td>
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<tr>
<td>Object (not justified nor effective in respect of NPPF paragraph 182)</td>
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<tr>
<td>WPI acknowledges and strongly supports the need to ensure that there is no likely significant effect on the Thames Basin Heaths SPA resulting from increases in recreational pressure due to the Local Plan acting either alone or in combination with other plans and projects. The extremely well advanced proposals for Suitable Alternative Natural Greenspace (SANG) provision at Wisley Airfield, and the overall package of bespoke impact avoidance and mitigation measures, as endorsed by Natural England, reflect this.</td>
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<td>However, we maintain a technical objection with respect to the precise wording of draft Policy P5, as it unhelpfully elides the first two distinct stages in what is known as the ‘Habitats Regulations Assessment’ (HRA) process, carried out under the Conservation of Habitats and Species Regulations 2010 (as amended).</td>
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<tr>
<td>These first two stages of the HRA process, which should be addressed in sequence, are the Screening and Appropriate Assessment stages respectively. The detail of the process to be followed is included in Appendix 4 with respect to Ecology.</td>
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<tr>
<td>The first paragraph of Policy P5 confuses the Screening and Appropriate Assessment stages of the HRA process by eliding the notions of ‘likely significant effect’ (considered under Screening) and &quot;adverse effect on integrity’ (considered under Appropriate Assessment).</td>
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<tr>
<td>Bullet points 2, 3, 5, 6 and 7 of the draft policy wording, and its supporting text, make reference to the provision of SANG and SAMM as ‘mitigation’ measures. However, in line with the strategic approach advocated within the Delivery Framework discussed above, such measures are actually intended to prevent any net increase in recreational pressure on the SPA altogether, rather than mitigate (reduce) potential effects, and therefore are better labelled as ‘impact avoidance’. All references to ‘mitigation measures’ in relation to this policy should therefore be removed and replaced by the term ‘impact avoidance measures’.</td>
<td></td>
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<tr>
<td>The last bullet point of draft Policy P5 is technically incorrect (or at least incomplete). Whilst bespoke impact avoidance measures should be agreed with Natural England under Policy NRM6 of the South East Plan), GBC is the competent authority for the purposes of the Habitats Regulations, and the decision maker. Hence, proposals for new SANGs cannot and should not be ‘approved’ by Natural England. Rather, Natural England is a key consultee. The reference to Natural England ‘approving’ SANGs should be deleted from the draft policy and paragraph 4.3.60. Instead, the important role of Natural England should be noted in their capacity as a key statutory consultee.</td>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 160715_Local_Plan_Reps__July_2016__and_Appendices.pdf (11.0 MB)

<table>
<thead>
<tr>
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<td>9079393 / Wisley Property Investments Ltd.</td>
<td>Savills (Jim Beavan)</td>
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<tr>
<td>Policy/Section / page / para</td>
<td>Original Changes requested (July 2016 Representation)</td>
<td>Understanding of changes shown in the Focused Amendments (June 2017)</td>
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<tr>
<td>Policy P5: TBH SPA Page 58</td>
<td>Amend the first paragraph of draft policy to read: “Permission will not be granted for development proposals unless it can be demonstrated, through the provision of objective evidence, that the proposals would not be likely to contribute to likely significant effects on the Thames Basin Heaths Special Protection Area (SPA), either alone or in combination with other plans and projects, or if this is not possible, through an Appropriate Assessment that demonstrates that there will not be any adverse effect on….”</td>
<td>(Pages 65 and 66) The requested changes and additions to the policy have not been included in full.</td>
</tr>
</tbody>
</table>

This change will ensure that the test applied through Policy P5 accords both with principles that underlie the endorsed JSPB Delivery Framework (2009) and Policy NRM6 of the South East Plan. In addition, the last bullet point of the draft policy is technically incorrect. GBC is the competent authority and decision maker. Hence, proposals for new SANGs cannot and should not be ‘approved’ by Natural England. Rather, Natural England is a key consultee. GBC’s own ‘TBH SPA Avoidance Strategy 2009-2016’ should be cited at paragraph 4.3.50, 4.3.64 and within the ‘Key Evidence’ section.

Reference to a SANG being “approved” by Natural England have been changed to “agreed” by Natural England.

The requested reference to the TBH SPA Avoidance Strategy has not been included in the policy or associated text. However, there have been general changes with the removal of paragraph 4.3.50 and its replacement with paragraphs 4.3.50a, 4.3.50b and 4.3.50c. Though on the basis of wider amendments to the GBLP, this concern is no longer paramount.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17262  Respondent: 9228769 / Cathryn Fleming  Agent:
Inclusion of the Wisley Airfield and the 2000 plus homes etc

- The impact of 2100 houses on the environmentally sensitive TBHSPA cannot be mitigated. Damage will occur to the habitats of the protected and endangered rare species in contravention of the EU Birds Directives & Habitats Regulations.
- The siting of the proposed Suitable Alternative Natural Green Space adjacent to the SPA will only increase visitor numbers causing further damage to the protected area.
- Para 119 of the NPPF "presumption in favour of sustainable development" does not apply where development requires assessment under the Birds or Habitat Directives and this fact has been TOTALLY ignored by the Applicant.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8085  Respondent: 9298689 / Rod Wild  Agent: 9298689

Policy P5 - Thames Basin Heath Special Protection Areas

OBJECT. The whole SANG concept is deeply flawed. There is a fundamental requirement in European law that developers and the Council must have convincing, objective evidence that developments have no adverse impact on the PA (Waddenzee judgment, case no: C-127-02). This does not appear to have been done for a number of sites. The SANGs put forward are mostly already in public use, further away from the planned developments, and irredeemably less attractive than the sandy heaths of Whitmoor Common.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14948  Respondent: 9327009 / sp2 Consulting Limited (Stephen Parker)  Agent: 9327009

I OBJECT. This policy is weak. The mitigation (cash compensation) offered for development in the special protection area is so small and negligible as to be meaningless. SANG (Suitable Alternative Natural Greenspace) is not beneficial; the sites identified or targeted are already green space. To create SANG is just using agricultural or wooded land as recreation land in order to justify building on other green spaces. There is no actual increase in environmental protection; it is a policy designed to permit building on otherwise protected areas. SANG – in part used to prevent dogs and cats attacking nesting birds - must ensure that it is not using land which is adjacent to the special protection areas.
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ). is Legally Compliant? ( )

Policy P5: Thames Basin Heaths Special Protection Areas

I have sympathy with the sentiment of this policy, but **OBJECT** to its practical effect.

In the case of the recent Wisley Airfield Planning Application, the applicant proposed to use a SANG that lay between the development site and the SPA, which would therefore have drawn walkers and dogs towards the environmentally sensitive area of the SPA, thereby frustrating the whole purpose of providing the SANG. I am aware that Natural England is a statutory consultee, but this policy must be drafted so that the Council, and the Planning Committee in particular, is not left having to accept advice that is clearly wrong-headed. This Policy is our policy for the protection of our environment, and it should make it quite clear that the Council and residents wish to apply conditions that prevent the negation of safeguards that have been developed specifically for the purpose of environmental protection. I therefore propose that the TBHSPA Avoidance Strategy is reviewed, its provisions updated and strengthened, and that it is specifically called up in this policy so that the appropriate protection can be provided.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10638</th>
<th>Respondent: 9335041 / David Reeve</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5</td>
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</tbody>
</table>

**OBJECT** (on 2 distinct grounds)

1. The proposed amendments to sentence 2, paragraph 1 of the Policy (“Where one or more adverse effects on the integrity of the SPA are likely will arise, measures to avoid and mitigate these effects must be delivered and secured in perpetuity.”) introduces a degree of certainty into the required test that cannot realistically be achieved. This will mean that it will be much easier for developers to evade their intended responsibilities to avoid and/or mitigate any effects of their proposed development(s) on the SPA. I **therefore object to this proposed change**.

2. The final sentence of the new text in paragraph 4.3.50c is unacceptable. A proposed development that provides or contributes to SANG/SAMM should not be exempt from the requirement to undergo Appropriate Assessment. By way of illustration, I understand that the applicant for the Wisley site originally proposed to use part of the site that fell within the “exclusion zone” as SANG. In order to protect the SPA from any chance of such approaches in the future it is essential that exemptions from Appropriate Assessment are not possible. I **therefore object to this sentence of the proposed change**.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/1584  Respondent: 10617441 / Graham Sykes  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P5  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  
7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).  
What changes (2016)/further amendments (2017) do you suggest should be made to the document?  
Attached documents:  

Comment ID: PSLPP16/1592  Respondent: 10617569 / Lydia Sykes  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P5  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  
7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).  
What changes (2016)/further amendments (2017) do you suggest should be made to the document?  
Attached documents:  

Comment ID: PSLPP16/8221  Respondent: 10662849 / Garry Walton  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P5  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  
POLICY P5 - Thames Basin Heath Special Protection Areas  
I OBJECT. This policy is weak. The mitigation (cash compensation) offered for development in the special protection area is so small as to be meaningless.  
SANG (Suitable Alternative Natural Greenspace) is not beneficial since the sites identified or targeted are already green space. To create SANG is just using agricultural or wooded land as recreation land in order to justify building on other green spaces nearby. There is no actual increase in environmental protection; instead, it is a ploy designed to permit building on otherwise protected areas. SANG – in part used to prevent dogs and cats attacking nesting birds – must ensure that it is not using land which is adjacent to the Special Protection Areas.  
What changes (2016)/further amendments (2017) do you suggest should be made to the document?  
Attached documents:  

Comment ID: PSLPP16/13691  Respondent: 10782625 / Heather Alexander  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P5
I OBJECT TO POLICY P5 (THAMES BASIN HEATH S.P.A.):

- Compensation mechanism too feeble to provide protection.
- Cynical encouragement of SANG to justify nearby development in protected areas. Does not extend protection or amount of green space, and can damage them (e.g. dog and cat attacks on wildlife).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/856  Respondent: 10798049 / Steve & Maureen Knight  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Support in principle but the Waddenzee judgement must be applied

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/332  Respondent: 10799169 / Neal Basson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY P5: Thames Basin Heath Special Protection Areas

OBJECT. This policy is weak. The mitigation (cash compensation) offered for development in the special protection area is so small and negligible as to be meaningless.

SANG (Suitable Alternative Natural Greenspace) is not beneficial; the sites identified or targeted are already green space. To create SANG is just using agricultural or wooded land as recreation land in order to justify building on other green spaces. There is no actual increase in environmental protection; it is a policy designed to permit building on otherwise protected areas. SANG – in part used to prevent dogs and cats attacking nesting birds - must ensure that it is not using land which is adjacent to the special protection areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18378  Respondent: 10799169 / Neal Basson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
OBJECT. This policy is weak. The mitigation (cash compensation) offered for development in the special protection area is so small and negligible as to be meaningless.

SANG (Suitable Alternative Natural Greenspace) is not beneficial; the sites identified or targeted are already green space. To create SANG is just using agricultural or wooded land as recreation land in order to justify building on other green spaces. There is no actual increase in environmental protection; it is a policy designed to permit building on otherwise protected areas. SANG – in part used to prevent dogs and cats attacking nesting birds - must ensure that it is not using land which is adjacent to the special protection areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17528  Respondent: 10799425 / Guildford Greenbelt Group (Susan Parker)  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), Sound? ( ), is Legally Compliant? ( )

We OBJECT to this policy. This policy is weak. The mitigation (cash compensation) offered for development in the special protection area is so small and negligible as to be meaningless. SANG (Suitable Alternative Natural Greenspace) is not beneficial; the sites identified or targeted are already green space. To create SANG is just using agricultural or wooded land as recreation land in order to justify building on other green spaces. There is no actual increase in environmental protection; it is a policy designed to permit building on otherwise protected areas. SANG – in part used to prevent dogs and cats attacking nesting birds - must ensure that it is not using land which is adjacent to the special protection areas.

Thames Basin Heaths Special Protection Area (TBH SPA; see Map 1, Appendix 1), is a statutory designated site and designated for its rare and vulnerable birds, specifically nightjar, Dartford warbler and woodlark under the EC Birds Directive. This site also forms part of the Thursley, Ash, Pirbright and Chobham Special Area of Conservation (SAC), a statutory designated site and designated for its North Atlantic wet heaths, European dry heaths and peat bogs.

We believe that the Plan is unsound as the Habitats Regulations Assessment prepared for GBC does not take sufficient account of the impact seven proposed developments will have upon the Thames Basin Heaths Special Protection Area (TBH SPA) which is a European Site (as defined under the Habitats Directive and Conservation of Habitats and Species Regulations 2010 (as amended).

The seven proposed developments are less than five kilometres away from the TBH SPA and in some cases not much beyond the 400m exclusion zone, occupying an area between under 1km to just over 2km from the TBH SPA. It has been indicated that the cumulative effect of further residential development up to 5 km from protected heathlands will have a significant adverse effect on the heaths. The TBH SPA is an internationally important habitat for three rare species of bird - the Dartford warbler, woodlark and nightjar. The latter two are ground nesting and therefore particularly susceptible to disturbance from people and animals. In fact Natural England believes that recreational use of the heaths arising from housing developments up to five kilometres away from a SPA will create disturbance to rare bird populations.

A survey in 2008 showed that more than 83% of visitors to the SPA arrived by car and that 70% of those had come from within 5km of its access point. A very large proportion of the TBH SPA visitors are dog walkers, many of whom visit a particular site on a regular basis. A follow-up survey in 2012 found that there was a 10% increase in visitors to the SPA.

A survey of households carried out by a veterinary team at Bristol University in 2010 “Number and ownership profiles of cats and dogs in the UK” published in the Journal of The British Veterinary Association indicates 31% households own dogs and 26% households own cats. Dogs were more likely to be owned by rural households.
Applying this analysis for all new housing at the listed strategic housing sites in the draft Local Plan within the 400m-5km mitigation zone of TBHSPA (in total 7,000 new homes), the cumulative impact of dog ownership (up to an estimated 2,200 new dogs within 5 km of TBHSPA) with dog-walker incursions on the rare bird species habitat of the TBHSPA will be a devastating increase. No amount of SANG nor SAMM programmes will change human behaviour and the draft Local Plan evidence base contains no studies or data to prove otherwise, it contains only unproven assertions. Natural England can provide no survey evidence of the effectiveness of SANG or SAMM programmes in attracting dog-walkers and other visitors away from TBHSPA.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/821  **Respondent:** 10804961 / M. Basson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

OBJECT. This policy is weak. The mitigation (cash compensation) offered for development in the special protection area is so small and negligible as to be meaningless.

SANG (Suitable Alternative Natural Greenspace) is not beneficial; the sites identified or targeted are already green space. To create SANG is just using agricultural or wooded land as recreation land in order to justify building on other green spaces. There is no actual increase in environmental protection; it is a policy designed to permit building on otherwise protected areas. SANG – in part used to prevent dogs and cats attacking nesting birds - must ensure that it is not using land which is adjacent to the special protection areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/6633  **Respondent:** 10829121 / Julie Brown  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

**I object to POLICY P5 - Thames Basin Heath Special Protection Areas**

- Compensation mechanism too feeble to provide protection.
- Cynical encouragement of SANG to justify nearby development in protected areas. Does not extend protection or amount of green space, and can damage them (e.g. dog and cat attacks on wildlife).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/1222  **Respondent:** 10829889 / Geraldine Leiper  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P5
I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to Thames Basin Heaths Special Protection area (SPZ), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14518  
**Respondent:** 10846625 / Frank Drennan  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

I object to POLICY P5 - Thames Basin Heath Special Protection Areas

- Compensation mechanism too feeble to provide protection.
- Cynical encouragement of SANG to justify nearby development in protected areas. Does not extend protection or amount of green space, and can damage them (e.g. dog and cat attacks on wildlife).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8878  
**Respondent:** 10857889 / William Kyte OBE  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

1.1 I object to policy P5 “Thames Basin Heath Special Protection Areas” on the grounds that;

1.2 This policy is weak. The mitigation (cash compensation) offered for development in the special protection area is so small as to be meaningless.

1.3 SANG (Suitable Alternative Natural Greenspace) is not beneficial since the sites identified or targeted are already green space. This is just using agricultural or wooded land as recreation land in order to justify building on other green spaces nearby. There is no actual increase in open space or environmental protection; instead, it is a ploy designed to permit building on otherwise protected areas. SANG – in part used to prevent dogs and cats attacking nesting birds – must also ensure that it is not using land which is adjacent to the Special Protection Areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy P5: Thames Basin Heaths Special Protection Area

I OBJECT to this policy.

This policy is weak.

SANG (Suitable Alternative Natural Greenspace) is not beneficial; the sites identified or targeted are already green space, which could be destroyed by urbanisation in order to spend the developer compensation received.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18595  Respondent: 10858977 / Angela Otterson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to policy P5 Thames Basin Heath Special Protection Areas

This policy is weak. The mitigation (cash compensation) offered for development in the special protection area is so small as to be meaningless.

SANG (Suitable Alternative Natural Greenspace) is not beneficial since the sites identified or targeted are already green space. This is just using agricultural or wooded land as recreation land in order to justify building on other green spaces nearby. There is no actual increase in open space or environmental protection; instead, it is a ploy designed to permit building on otherwise protected areas.

SANG – in part used to prevent dogs and cats attacking nesting birds – must also ensure that it is not using land which is adjacent to the Special Protection Areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16016  Respondent: 10859553 / MARK Curtis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY P5 SPAs

I object to policy P5 Thames Basin Heath Special Protection Areas

This policy is not robust enough. The mitigation (cash compensation) offered for development in the special protection area is so small as to be meaningless.
SANG (Suitable Alternative Natural Greenspace) is not beneficial since the sites identified or targeted are already green space. This is just using agricultural or wooded land as recreation land in order to justify building on other green spaces nearby. There is no actual increase in open space or environmental protection; instead, it is a ploy designed to permit building on otherwise protected areas. SANG – in part used to prevent dogs and cats attacking nesting birds – must also ensure that it is not using land which is adjacent to the Special Protection Areas.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/18128</th>
<th>Respondent: 10910273 / Lynda M Williams</th>
<th>Agent:</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P5</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
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<tr>
<td>We support this policy.</td>
<td></td>
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<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<tr>
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</table>

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<th>Comment ID: PSLPP16/7213</th>
<th>Respondent: 10915361 / Judy Young</th>
<th>Agent:</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P5</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>
| POLICY P5 – Thames Basin Heath Special Protection Areas

I OBJECT to this policy which offers no increase in environmental protection. Suitable Alternative Natural Greenspaces cannot be justified where development is then permitted on otherwise protected areas. | |
| **What changes (2016)/further amendments (2017) do you suggest should be made to the document?** | | |
| **Attached documents:** | | |

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/8294</th>
<th>Respondent: 10918657 / Angus MacDonald</th>
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<tbody>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P5</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>
| I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation. | | |
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11318  Respondent: 10923297 / Matthew Burnham   Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P5
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY P5 (THAMES BASIN HEATH S.P.A.):

- Compensation mechanism too feeble to provide protection.
- Cynical encouragement of SANG to justify nearby development in protected areas. Does not extend protection or amount of green space, and can damage them (e.g. dog and cat attacks on wildlife).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1709  Respondent: 10933793 / Julia Tilbury   Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P5
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY P5 -Thames Basin Heath Special Protection Areas

I OBJECT . This policy is weak. The mitigation (cash compensation) offered for development in the special protection area is so small as to be meaningless.

SANG (Suitable Alternative Natural Greenspace) is not beneficial since the sites identified or targeted are already green space. This is just using agricultural or wooded land as recreation land in order to justify building on other green spaces nearby. There is no actual increase in open space or environmental protection; instead, it is a ploy designed to permit building on otherwise protected areas. SANG- in part used to prevent dogs and cats attacking nesting birds - must also ensure that it is not using land which is adjacent to the Special Protection Areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1681  Respondent: 10933857 / C J Tilbury   Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P5
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY P5 -Thames Basin Heath Special Protection Areas
I OBJECT. This policy is weak. The mitigation (cash compensation) offered for development in the special protection area is so small as to be meaningless.

SANG (Suitable Alternative Natural Greenspace) is not beneficial since the sites identified or targeted are already green space. This is just using agricultural or wooded land as recreation land in order to justify building on other green spaces nearby. There is no actual increase in open space or environmental protection; instead, it is a ploy designed to permit building on otherwise protected areas. SANG – in part used to prevent dogs and cats attacking nesting birds – must also ensure that it is not using land which is adjacent to the Special Protection Areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Thames Basin Heath Special Protection Areas – I OBJECT. This policy is weak. The mitigation (cash compensation) offered for development in the special protection area is so small and negligible as to be meaningless. SANG (Suitable Alternative Natural Greenspace) is not beneficial; the sites identified or targeted are already green space. To create SANG is just using agricultural or wooded land as recreation land in order to justify building on other green spaces. There is no actual increase in environmental protection; it is a policy designed to permit building on otherwise protected areas. SANG – in part used to prevent dogs and cats attacking nesting birds - must ensure that it is not using land which is adjacent to the special protection areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8789  Respondent:  11011777 / Sally Norton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy P5 Thames Basin Heaths SPA

I object to Policy P5 Thames Basin Heaths SPA

I believe that the Plan is unsound as the Habitats Regulations Assessment prepared for GBC does not take sufficient account of the impact seven proposed major housing developments within 5 km will have upon the Thames Basin Heaths Special Protection Area (TBH SPA) which is a European Site (as defined under the Habitats Directive and Conservation of Habitats and Species Regulations 2010 [as amended]).

Thames Basin Heaths Special Protection Area is a statutory site designated for its rare and vulnerable birds, specifically nightjar, Dartford warbler and woodlark under the EU Birds Directive.

This site also forms part of the Thursley, Ash, Pirbright and Chobham Special Area of Conservation (SAC), a statutory site designated for its North Atlantic wet heaths, European dry heaths and peat bogs.

SANG (Suitable Alternative Natural Greenspace) is not additional; the sites identified or targeted are already green space. To create SANG will use existing Grade 2 and 3a agricultural or wooded land as recreation land in order to justify building on other green spaces. There is no actual increase in environmental protection; it is a policy designed to permit building on otherwise protected areas. SANG, in part used to prevent dogs and cats attacking nesting birds, must ensure that it is not using land which is adjacent to the special protection areas.

A Natural England survey in 2005 showed that more than 83% of visitors to the SPA arrived by car and that 70% of those had come from within 5km of its access point. A very large proportion of the TBH SPA visitors are dog walkers, many of whom visit a particular site on a regular basis. A follow-up survey in 2012 found that there was a 10% increase in visitors to the SPA since 2005. Habitats Regulation Assessment [HRA]

I object to the HRA and its Appendixes A, B and C I object to the omission of 2012/13 Natural England survey of visitor numbers to the TBHSPA report from the HRA. The HRA fails to list the 2012 Natural England Survey of Visitors to the TBHSPA as material evidence (Natural England Commissioned Report NECR136 Results of the 2012/13 visitor survey on the Thames Basin Heaths Special Protection Area (SPA), First Published 13 February 2014;

Natural England Project Manager - Patrick McKernan, Natural England, Guildbourne House, Chatsworth Road, Worthing, West Sussex, BN11 1LD
The 2012 NE visitor survey reports a 10% increase in visitor numbers. This is neither considered nor critically appraised as a contribution to the analysis of success or failure of the TBHSPA Avoidance Strategy 2009-2014 and the implications for Policy P2, P5, E8 and E9. The HRA fails to assess whether SANG and SAMM current policies and programmes are effective, either independently or in combination, in attracting visitors, cross-country cyclists and dog-walkers away from TBHSPA. On enquiry, Natural England admitted they have no such survey evidence for TBHSPA SANG or SAMM programmes.

The HRA fails to assess in detail, with associated numerical calculations and a described methodology that can be independently verified, the cumulative potential impact on disturbance and predation rates within TBHSPA by the introduction of domestic pets (dogs and cats) from new dwellings; the introduction of over 8,000 dwellings within the 400m-5km mitigation zone will give rise to over 19,000 human inhabitants (ONS 2.4 people per household).

A survey of households carried out by a veterinary team at Bristol University in 2010 “Number and ownership profiles of cats and dogs in the UK” published in the Journal of The British Veterinary Association (Veterinary Record 2010;166:163-168 doi:10.1136/vr.b4712 Authors: J. K. Murray, BScEcon, MSc, PhD1, W. J. Browne, BSc, MSc, PhD1, M. A. Roberts, BVM&S, MRCVS2, A. Whitmarsh1 and T. J. Gruffydd-Jones, BVetMed, PhD, MRCVS1) indicates 31% households own dogs and 26% households own cats. Dogs were more likely to be owned by rural households.

Applying this analysis for all new housing at the listed strategic housing sites in the draft Local Plan within the 400m-5km mitigation zone of TBHSPA (in total 8,000+ new homes), the cumulative impact of dog ownership (up to an estimated 2,500 new dogs and 2,000 new cats within 5 km of TBHSPA) with associated dog-walker incursions on the rare bird species habitat of the TBHSPA will be a devastating increase.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLP16/2451  **Respondent:** Linda Peters-Smith  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Policy P5 - Thames Basin Health Special Protection Areas**

I object. Suitable Alternative Green Space is not beneficial as they are already green spaces and is being used to justify development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLP16/1853  **Respondent:** Lorraine Pipe  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5633  Respondent: 11029409 / John Lay  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin (Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14127  Respondent: 11036289 / Osman Abdullah  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to policy P5 Thames Basin Heath Special Protection Areas This policy is not robust enough. The mitigation (cash compensation) offered for development in the special protection area is so small as to be meaningless. SANG (Suitable Alternative Natural Greenspace) is not beneficial since the sites identified or targeted are already green space. This is just using agricultural or wooded land as recreation land in order to justify building on other green spaces nearby. There is no actual increase in open space or environmental protection; instead, it is a ploy designed to permit building on otherwise protected areas. SANG – in part used to prevent dogs and cats attacking nesting birds – must also ensure that it is not using land which is adjacent to the Special Protection Areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14586  Respondent: 11036801 / Judith Mercer  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to POLICY P5(Thames Basin Heath Special Protection Areas) This policy does not increase environmental protection. It is simply designed to allow building on otherwise protected areas.
The SANG (Suitable Alternative Natural Greenspace) is not beneficial as the sites identified or targeted are already green space. It is using existing agricultural or wooded land as recreation land to justify building on other green spaces nearby! It is nonsensical and obvious that it is a ploy to ‘get round’ the protections already in place.

The policy should give clear statements of the current protections which SPAs are afforded by the EC Birds and Habitats Directives. This site is also part of the Special Area of Conservation (SAC) (Thursley, Ash Pirbright and Chobham) - a statutory designated site.

SANG should in part protect the nesting of rare species of birds on the SPA by ensuring it doesn't use land adjacent to the SPA areas.

The plan is unsound where the Habitats Regulations Assessment on behalf of Guildford Borough Council (GBC) has failed to study the impact of the 7 proposed developments being less than 5km away from the SPA. Analysis from surveys of visitors to the SPA areas has shown an increase in numbers from within 5km of the SPA. In addition analysis reveals that the effect of dog and cat ownership would indicate a harmful effect on the TBH SPA through the development of houses and other buildings also within 5km of the area not just a 400m distance away.

Therefore it would be reasonable to conclude that the SANG should also not be appropriate within that 5km distance from the SPAs thus giving proper protection from visitors and animals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/2917  Respondent: 11086433 / Colin Carmichael  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17150  Respondent: 12316001 / Vail Williams LLP (Jane Terry)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( Yes ), is Legally Compliant? ( Yes )

Proposals for a bespoke SANG straddling the administrative boundary between Guildford and Waverley Borough Councils have been submitted within the planning application for residential development in line with Policy A46 to the east of The Street, Tongham. This is a bespoke SANG which is intended to provide for the mitigation requirements of residential development to the south of Tongham (Policy A46). However it also provides additional mitigation capacity for further residential development within a 5km catchment area and is well placed to provide mitigation for the rest of the Policy A29 strategic development area.

The SANG proposal does not appear in the Guildford Infrastructure Delivery Plan as either a strategic SANG or bespoke SANG. Rather, SANG provision is set out in the Infrastructure Delivery Plan with Policy A29 development being allocated solely to the Russell Place Farm SANG whose 5km catchment in any event does not cover the whole of the A29 strategic development area. Recognition should be given to the Tongham Road SANG which will provide the appropriate SPA mitigation and which, following the submission of further details as to the delivery plan, is now expected to receive the support of Natural England. This SANG will also provide additional capacity and flexibility to deliver the necessary mitigation to other sites within the strategic development area as well as those coming forward in Waverley Borough. Its inclusion in the Plan will enhance resilience of the Plan by ensuring much needed residential development is not delayed through non-delivery of either the Russell Place or Ash Lodge Drive SANGS.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4755  Respondent: 15084897 / Save Send Action Group (Andrew Procter)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

16  POLICY P5 SPAs

16.1  I object to policy P5 Thames Basin Heath Special Protection Areas
16.2 This policy is weak. The mitigation (cash compensation) offered for development in the special protection area is so small as to be meaningless.

16.3 SANG (Suitable Alternative Natural Greenspace) is not beneficial since the sites identified or targeted are already green space. This is just using agricultural or wooded land as recreation land in order to justify building on other green spaces nearby. There is no actual increase in open space or environmental protection; instead, it is a ploy designed to permit building on otherwise protected areas. SANG – in part used to prevent dogs and cats attacking nesting birds – must also ensure that it is not using land which is adjacent to the Special Protection Areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/1322  **Respondent:** 15225857 / BlackOnyx Developments limited  **Agent:** AECOM (Philip Scott)

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

*Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )*  

**PROPOSED SUITABLE ALTERNATIVE NATURAL GREENSPACE (‘SANG8’) - LAND ADJACENT TO LONG REACH, WEST HORSLEY**

On behalf of our client, Green Reach Limited the owner of the land subject of these representations, please accept and register these formal representations to the Borough Council’s Proposed Submission Local Plan (Regulation 19) in regard to the promotion of 24.73 hectares of land adjacent Long Reach, West Horsley to deliver Suitable Alternative Natural Greenspace (‘SANG’).

In this particular regard these representations confirm our support for the following Proposed Submission policies:

- Proposed Submission Policy P5: Thames Basin Heaths Special Protection Areas
- Proposed Submission Policy I1: Infrastructure and Delivery

Additionally, these representations confirm our support the following identified site in Section 3 (Green Infrastructure) contained in the Borough Council’s Infrastructure Schedule:

- SANG 8 Long Reach Farm, West Horsley

However, we wish to propose a minor modification to the proposed site description of SANG 8 as follows:

‘SANG 8 Land Adjacent Long Reach, West Horsley’.

Reasoned Justification: The proposed SANG 8 as described in the Infrastructure Schedule is incorrect as there is no such address as Long Reach Farm. The 24.73 hectare site comprises former agricultural land located to immediately to the west (adjacent to) Long Reach in West Horsley. The land owner is Green Reach Limited. Therefore, an appropriate site description for inclusion within the Infrastructure Schedule is ‘SANG 8 Land Adjacent Long Reach, West Horsley’.

**Background**

Green Reach Limited fully supports the Submission Local Plan in regard to the provision of a new strategic SANG to the east of the borough at Long Reach, West Horsley. This is an area of the borough that suffers from a significant shortfall of strategic SANG. That shortfall detrimentally impacts on the Borough Council’s ability to encourage people away from the protected Thames Basin Heaths SPA and it has a significant detrimental impact on the Council’s spatial development strategy.
The provision of SANG forms an important part of a mitigation strategy formulated by the Borough Council as part of the adopted Thames Basin Heaths Special Protection Area (‘SPA’) Avoidance Strategy (2009-2016) which is overseen and implemented in partnership with Natural England in its role as an advisor to Government and as a statutory consultee.

The SPA is an area of Lowland Heath covering over 8,000 hectares of land across Surrey, Berkshire and Hampshire. The SPA was designated under the European Birds Directive in March 2005 because it supports important breeding populations of ground nesting birds that are particularly vulnerable to disturbance activities associated with people and domestic pets. To protect ground nesting birds the SPAs are afforded significant protection from new residential development so that the ecological integrity of SPAs are maintained. Accordingly, there is a significant requirement for areas affected by SPA to provide sufficient SANG in the SPA ‘zone of influence’ (400 metres to 5km catchment measured from the boundary of the SPA) to provide accessible areas for walking and outdoor recreation so that existing and future residents have a suitable alternative to using the highly vulnerable SPA for their recreation needs.

The urgent requirement for SANG has understandably resulted in the Borough Council identifying the need for new SANG land as part of the Infrastructure Schedule which accompanies the Proposed Submission Local Plan.

The Proposed Submission Local Plan identifies the need for, and objectives of, additional SANG land as part of Proposed Submission Policy P5: Thames Basin Heaths Special Protection Areas and Proposed Submission Policy I1: Infrastructure and Delivery. We fully support the aims and objectives of these proposed submission policies which are fully consistent with the Government’s National Planning Policy Framework (NPPF) and with Policy NRM6 of the South East Plan (which remains applicable at the regional level).

Specifically, in regard to national planning policy; section 11 of the NPPF is dedicated to the need to conserve and enhance the natural environment and in particular the need to minimise impacts on biodiversity and providing net gains in biodiversity wherever possible. Section 11 encourages local planning authorities to, ‘...set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure’. In this regard, we consider that Proposed Submission Policy SP5 and Policy I1, and proposed SANG 8 are fully in accordance with the NPPF.

Suitable Alternative Natural Greenspace – SANG 8 Long Reach, West Horsley

SANG’s themselves need to be rural in character and appearance, they should be interesting in their own right, comprise a minimum of 8 hectares in size incorporating at minimum 2.3 kilometre walk, and maintained and managed in perpetuity, and to deliver works that will improve SANG’s overall quality. This enhances the SANG’s capacity for recreation, makes it more attractive to users, and increases residents choice of sites to visit, thereby providing a range of sites of comparable interest and quality and removing visitor pressure on the fragile habitat of the SPA. At 24.73 hectares in size with potential for a car park and, the proposed Long Reach SANG will be able to accommodate an appropriate circular walk and would have a mitigation catchment area of 5 kilometres meaning that it would represent a strategic SANG in a geographic part of the borough that is short of available SANG land.

The site itself comprises 24.73 hectares of former agricultural land. The proposed site is not within a conservation area and there are no listed buildings or structures on the site. Furthermore, the site is not within the designated Area of Outstanding Natural Beauty (‘AONB’) and is not identified as being important in terms of any ecological designation. The site is located within the Green Belt, however, the primary function of SANG land is for informal recreation purposes drawing people away from the SPA and therefore the function and use of SANG will maintain the open characteristics of Green Belt in accordance with national planning policy.

A raft of baseline studies have been undertaken to assess the likely impacts of delivering a strategic SANG in this location, including; transport assessment, planning assessment, flooding and flood risk, ecological (stage 1) assessment, and landscape and visual impact assessment. All of these assessments demonstrate that the proposed SANG 8 can be delivered without causing detriment and indeed the benefits to the landscape, ecological value of the site and to the conservation objectives arising from the need to protect the Thames Basin Heaths SPA are considerable.

[IMAGE 1]

Proposed SANG 8 Land Adjacent Long Reach, West Horsley
A further benefit of proposed SANG 8 is that such provision would enable the potential impacts of permitted housing within the appropriate catchment to be properly mitigated and delivered in areas of the borough that would not otherwise be able to accommodate new housing. To be clear, SANG does not make unacceptable housing proposals acceptable. Its primary function is to act as mitigation against the potential harmful impacts of residents who might otherwise travel to the SPA for their outdoor recreation needs. Additionally, once designated and laid-out SANG land is maintained and improved in perpetuity meaning that it cannot be developed for alternative uses. Longer term maintenance and management of SANG will also ensure that SANG land deliver enhanced habitats for flora and fauna leading to ecological enrichment of landscapes.

The owners of proposed SANG 8 have already engaged with a variety of local and national stakeholders to discuss matters of broad principle including compliance with the Thames Basin Heaths SPA Avoidance Strategy. In particular, the owners have engaged with Natural England as part of its Discretionary Advice Service and has secured (without prejudice) advice on the principles of delivering a strategic SANG in this location. Natural England has confirmed that, subject to detailed considerations, it has no objection in principle to SANG 8 at Long Reach, West Horsley which is proposed in the Infrastructure Schedule.

Conclusion

The proposed Long Reach SANG (‘SANG 8’) as identified in the Borough Council’s Infrastructure Schedule and as supported by Proposed Submission Policy SP5 and Policy I1 is fully in accordance with the objectives of the Government’s National Planning Policy Framework, it will support the aims and objectives of policy NMR6 in the South East Plan, and it will support and uphold the Borough Council’s commitment towards the preservation and mitigation of the Thames Basin Heaths SPA as set out in the Council’s adopted Avoidance Strategy (2009-2016).

In all these respects the delivery of a strategic SANG site in this part of the borough, where there is a significant shortfall of appropriate SANG, is fully in accordance with the strategic policy objectives of the Borough Council.

We trust therefore that the Borough Council will continue to support the proposed SANG 8 as part of its Infrastructure Schedule with the minor modification to the proposed description of the SANG as set out in these representations.

In light of all of the above, I would be very grateful if you would confirm that these representations in support of Proposed Submission Policy P5: Thames Basin Heaths Special Protection Areas and Proposed Submission Policy I1: Infrastructure and Delivery, and support (with minor modification) for the proposed SANG 8: Long Reach, West Horsley are ‘duly made’.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  📄 IMAGE 1 AECOM1.png (433 KB)
I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Comment ID: PSLPP16/13740</th>
<th>Respondent: 15227905 / Nigel Alexander</th>
<th>Agent:</th>
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| Comment ID: PSLPP16/1737 | Respondent: 15244641 / Wesley Raynbird-Tilbury | Agent: |
POLICY P5: Thames Basin Heath Special Protection Areas

I Object. This policy is weak. The mitigation (cash compensation) offered for development in the special protection area is so small as to be meaningless.

SANG (Suitable Alternative Natural Greenspace) is not beneficial since the sites identified or targeted are already green space. This is just using agricultural or wooded land as recreation land in order to justify building on other green spaces nearby. There is no actual increase in open space or environmental protection; instead, it is a ploy designed to permit building on otherwise protected areas. SANG- in part used to prevent dogs and cats attacking nesting birds - must also ensure that it is not using land which is adjacent to the Special Protection Areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCl).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1858  Respondent: 15248449 / Peter Bessler  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

6) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCl).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1926  Respondent: 15254305 / Ben Barnwell  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCl).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7479  Respondent: 15264065 / Roshan Bailey  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to this policy as it stands since I believe it needs significant strengthening to ensure the appropriate level of protection for the Thames Basin Special Protection Area. It is important to ensure that measures required of developers will make a real difference in that the new residents will really use the designated alternatives. This means that the density of housing must be limited, truly significant green spaces must be an inherent part of larger developments, and alternative provision for smaller developments must be close by with easy access for new residents. I object to the
principle that developers may simply make a payment to Guildford Borough Council against a list of SANG sites which the new residents will not actually use as an alternative to the TBSPA. It is a cop out for developers, albeit a potential money making scheme for GBC, and will not achieve the protection ostensibly sought. Please also see my comments on Policy I1 re an addition to Appendix C. I walk for 1 to 2.5 hours almost every day, half the time towards the slopes of the Hogs Back and half the time on the Ranges (TBSPA). If site A26 goes ahead and the mitigation I suggest does not take place, I will undoubtedly walk on the Ranges even more often, and other walkers and riders would respond similarly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10947   Respondent: 15282625 / Kelly Graves   Agent: 
Document:   Proposed Submission Local Plan: strategy and sites 2016 / Policy P5
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY P5 (THAMES BASIN HEATH S.P.A.):
• Compensation mechanism too feeble to provide protection.
• Cynical encouragement of SANG to justify nearby development in protected areas. Does not extend protection or amount of green space, and can damage them (e.g. dog and cat attacks on wildlife).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14215   Respondent: 15299201 / Samira Abdullah   Agent: 
Document:   Proposed Submission Local Plan: strategy and sites 2016 / Policy P5
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to policy P5 Thames Basin Heath Special Protection Areas  This policy is not robust enough. The mitigation (cash compensation) offered for development in the special protection area is so small as to be meaningless. SANG (Suitable Alternative Natural Greenspace) is not beneficial since the sites identified or targeted are already green space. This is just using agricultural or wooded land as recreation land in order to justify building on other green spaces nearby. There is no actual increase in open space or environmental protection; instead, it is a ploy designed to permit building on otherwise protected areas. SANG – in part used to prevent dogs and cats attacking nesting birds – must also ensure that it is not using land which is adjacent to the Special Protection Areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2882   Respondent: 15301089 / Brian Yeomans   Agent: 
Document:   Proposed Submission Local Plan: strategy and sites 2016 / Policy P5
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3442  Respondent: 15320737 / Steven Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to POLICY P5 - Thames Basin Heath Special Protection Areas

- Compensation mechanism too feeble to provide protection.
- Cynical encouragement of SANG to justify nearby development in protected areas. Does not extend protection or amount of green space, and can damage them (e.g. dog and cat attacks on wildlife).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3149  Respondent: 15323041 / Jane Doherty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3312  Respondent: 15327905 / Julia Cook  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY P5 - Thames Basin Heath Special Protection Areas

I OBJECT. This policy is weak. The mitigation (cash compensation) offered for development in the special protection area is so small as to be meaningless.

SANG (Suitable Alternative Natural Greenspace) is not beneficial since the sites identified or targeted are already green space. This is just using agricultural or wooded land as recreation land in order to justify building on other green spaces nearby. There is no actual increase in open space or environmental protection; instead, it is a ploy designed to permit building on otherwise protected areas. SANG – in part used to prevent dogs and cats attacking nesting birds – must also ensure that it is not using land which is adjacent to the Special Protection Areas.
POLICY P5: Thames Basin Heath Special Protection Areas

GROUNDs FOR OBJECTION. This policy is weak. The mitigation (cash compensation) offered for development in the special protection area is so small and negligible as to be meaningless.

SANG (Suitable Alternative Natural Greenspace) is not beneficial; the sites identified or targeted are already green space. To create SANG is just using agricultural or wooded land as recreation land in order to justify building on other green spaces. There is no actual increase in environmental protection; it is a policy designed to permit building on otherwise protected areas. SANG – in part used to prevent dogs and cats attacking nesting birds - must ensure that it is not using land which is adjacent to the special protection areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/6746  Respondent: 15437889 / Janet Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Thames Basin Heath SPA  I support measures which protect this precious habitat.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6765  Respondent: 15438753 / Peter Fairbrass  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6783  Respondent: 15438945 / Jacqueline Davies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to POLICY P5 - Thames Basin Heath Special Protection Areas

• Compensation mechanism too feeble to provide protection.
• Cynical encouragement of SANG to justify nearby development in protected areas. Does not extend protection or amount of green space, and can damage them (e.g. dog and cat attacks on wildlife).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/7196  Respondent: 15445665 / Jonathan Hewlett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

8) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14365  Respondent: 15446401 / Louise Yandle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY P5 (THAMES BASIN HEATH S.P.A.):
• Compensation mechanism too feeble to provide protection.
• Cynical encouragement of SANG to justify nearby development in protected areas. Does not extend protection or amount of green space, and can damage them (e.g. dog and cat attacks on wildlife).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7629  Respondent: 15450817 / Audrey Gachen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to POLICY P5 - Thames Basin Heath Special Protection Areas
• Compensation mechanism too feeble to provide protection.
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8009  Respondent: 15457953 / Ian Symes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
P5

Thames Basin Heaths SPA:

I object to a car park on Effingham Common. Its proposed location in the middle of the common is in an area where Skylarks nest, and Skylarks are on the red list in the UK. A car park situated on the Common is completely impractical, it would be full of commuters’ cars from morning to night as it is so close to Effingham Junction station.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8015  Respondent: 15458081 / K C Meldrum  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy P5- the policy will have to be reviewed as a result of the UK’s decision to leave the EU.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8270  Respondent: 15463713 / Tracey Broadhurst-Jones  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8274  Respondent: 15463777 / Jade Broadhurst-Jones  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8278  Respondent: 15463841 / Jessie Macdonald  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Comment ID: PSLPP16/8283  Respondent: 15463873 / Ellen Macdonald  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/8922  Respondent: 15478017 / Kirstie Pankhurst  Agent:</th>
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<tr>
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<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
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<tr>
<td>I support this policy.</td>
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<th>Comment ID: PSLPP16/9116  Respondent: 15479201 / Nick Norton  Agent:</th>
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| I OBJECT TO POLICY P5 (THAMES BASIN HEATH S.P.A.):
  • Compensation mechanism too feeble to provide protection.
  • Cynical encouragement of SANG to justify nearby development in protected areas. Does not extend protection or amount of green space, and can damage them (e.g. dog and cat attacks on wildlife).
| **What changes (2016)/further amendments (2017) do you suggest should be made to the document?** |
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<th>Comment ID: PSLPP16/9116  Respondent: 15479201 / Nick Norton  Agent:</th>
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</table>
| I object to Policy P5 Thames Basin Heaths SPA

I believe that the Plan is unsound as the Habitats Regulations Assessment prepared for GBC does not take sufficient account of the impact seven proposed developments will have upon the Thames Basin Heaths Special Protection Area (TBH SPA) which is a European Site (as defined under the Habitats Directive and Conservation of Habitats and Species Regulations 2010 (as amended).

Thames Basin Heaths Special Protection Area is a statutory designated site and designated for its rare and vulnerable birds, specifically nightjar, Dartford warbler and woodlark under the EC Birds Directive. This site also forms part of the Thursley, Ash, Pirbright and Chobham Special Area of Conservation (SAC), a statutory designated site and designated for its North Atlantic wet heaths, European dry heaths and peat bogs.

SANG (Suitable Alternative Natural Greenspace) is not additional; the sites identified or targeted are already green space. To create SANG is just using agricultural or wooded land as recreation land in order to justify building on other green spaces. There is no actual increase in environmental protection; it is a policy designed to permit building on otherwise protected areas. SANG, in part used to prevent dogs and cats attacking nesting birds, must ensure that it is not using land which is adjacent to the special protection areas.

The seven proposed developments are less than five kilometres away from the TBH SPA and in some cases not much beyond the 400m exclusion zone, occupying an area between under 1km to just over 2km from the TBH SPA. It has been
indicated that the cumulative effect of further residential development up to 5 km from protected heathlands will have a significant adverse effect on the heaths.

A survey in 2005 showed that more than 83% of visitors to the SPA arrived by car and that 70% of those had come from within 5km of its access point. A very large proportion of the TBH SPA visitors are dog walkers, many of whom visit a particular site on a regular basis. A follow-up survey in 2012 found that there was a 10% increase in visitors to the SPA.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9740  Respondent: 15485665 / Lynne Davies  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the introduction of SANGs to justify using agricultural or woodland as recreation areas in order to justify building elsewhere. We do not need any more SANGs if we do not build on the green belt & AONB.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11079  Respondent: 15509057 / Richard Golding  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT. This policy is weak. The mitigation (cash compensation) offered for development in the special protection area is so small as to be meaningless. SANG (Suitable Alternative Natural Green space) is not beneficial since the sites identified or targeted are already green space. This is just using agricultural or wooded land as recreation land in order to justify building on other green spaces nearby. There is no actual increase in open space or environmental protection; instead, it is a ploy designed to permit building on otherwise protected areas. SANG – in part used to prevent dogs and cats attacking nesting birds – must also ensure that it is not using land which is adjacent to the Special Protection Areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11443  Respondent: 15571425 / Monika Neczaj  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY P5 (THAMES BASIN HEATH S.P.A.):

- Compensation mechanism too feeble to provide protection
• Cynical encouragement of SANG to justify nearby development in protected areas. Does not extend protection or amount of green space, and can damage them (e.g. dog and cat attacks on wildlife).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11487  Respondent: 15571553 / Darren Carbine  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY P5 - Thames Basin Heath Special Protection Areas - I OBJECT.

This policy is weak. The compensation offered for development in the special protection area is so small as to be meaningless. SANG (Suitable Alternative Natural Greenspace) is not beneficial since the sites identified or targeted are already green space. This is just using agricultural or wooded land as recreation land in order to justify building on other green spaces nearby. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11683  Respondent: 15573953 / Barbara Forrest  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Thames Basin Heath SPA/SSSI/SNCI : The impact of 2,068 houses on the environmentally sensitive TBHSPA cannot be mitigated. Damage will occur to the habitats of the protected and endangered rare species (including skylarks, nightjars and many others on the RSPB red list) in contravention of the EU Birds Directives and Habitats Regulations

• The siting of the proposed Suitable Alternative Natural Green Space (SANG) adjacent to the SPA will only increase visitor numbers causing further damage
• Part of the SANG is in a designated flood plain
• Para 119 of the NPPF “presumption in favour of sustainable development” does not apply where development requires assessment under the Birds or Habitat Directives
• It is impossible to state without doubt that the mitigation proposed will prevent damage to the SPA particularly in the light of inadequate traffic/air quality reports.
• There are likely to be over 700 dogs and 700 cats living on the proposed development. These will be a constant threat to ground nesting birds on the SPA and cannot be mitigated by one warden working a normal working day.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18727  Respondent: 15579457 / RSPB South East Office (Heather Richards)  Agent:
<table>
<thead>
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<td>To which section of the plan (paragraph/policy/map/table) does this comment relate?</td>
</tr>
<tr>
<td>Policy P5: Thames Basin Heath Special Protection Area</td>
</tr>
<tr>
<td><strong>Do you consider this section of the plan is legally compliant?</strong> Yes</td>
</tr>
<tr>
<td><strong>Do you consider this section of the plan is sound?</strong> Yes</td>
</tr>
<tr>
<td><strong>Do you consider this section of the document complies with the Duty to cooperate?</strong> Yes</td>
</tr>
<tr>
<td><strong>RSPB Comment:</strong></td>
</tr>
<tr>
<td>The RSPB welcomes the detailed policy to protect the Special Protection Area.</td>
</tr>
<tr>
<td><strong>What changes do you suggest should be made to the document?</strong></td>
</tr>
<tr>
<td>The RSPB does not recommend any changes should be made.</td>
</tr>
<tr>
<td><strong>If you are proposing a change to the Proposed Submission Local Plan: strategy and sites, do you wish to express an interest in participating at the Examination?</strong> Yes.</td>
</tr>
<tr>
<td><strong>Why do you wish to participate at the Examination?</strong></td>
</tr>
<tr>
<td>The RSPB has been involved in the formulation and subsequent delivery of the Thames Basin Heaths Special Protection Area Delivery Framework, whose objectives are delivered through policy P5. The RSPB is keen to be involved in any discussion about this policy at the Examination in order to support the approach that the Council have taken.</td>
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<td><strong>POLICY P5 SPAs</strong></td>
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<th>Comment ID: PSLPP16/16270</th>
<th>Respondent: 15603361 / Ann Watkins</th>
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<th>Respondent: 15614497 / Hannah Yandle</th>
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I object to policy P5 Thames Basin Heath Special Protection Areas. This policy is not robust enough. The mitigation (cash compensation) offered for development in the special protection area is so small as to be meaningless. SANG (Suitable Alternative Natural Greenspace) is not beneficial since the sites identified or targeted are already green space. This is just using agricultural or wooded land as recreation land in order to justify building on other green spaces nearby. There is no actual increase in open space or environmental protection; instead, it is a ploy designed to permit building on otherwise protected areas. SANG – in part used to prevent dogs and cats attacking nesting birds – must also ensure that it is not using land which is adjacent to the Special Protection Areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16334  Respondent: 15640897 / Jackie van Heesewijk  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

I OBJECT TO POLICY P5 (THAMES BASIN HEATH S.P.A.): • Compensation mechanism too feeble to provide protection. • Cynical encouragement of SANG to justify nearby development in protected areas. Does not extend protection or amount of green space, and can damage them (e.g. dog and cat attacks on wildlife).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16363  Respondent: 15641281 / Paula Redmond  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

I object to not protecting the wildlife within the range of the Local Plan and the cumulative impacts on wildlife populations in the Thames Basin Heaths and the UK as a whole P5

“The [Wisley] PMDA is located within a Site of Nature Conservation Importance (SNCI) as stated above. A designated Special Protection Area (SPA), Important Bird Area, Local Nature Reserve and Registered Common Land is also located to the north of the disused airfield within Ockham Common. The 400 metre buffer of the SPA includes land to the north of the PMDA generally to the north of the disused runway. Residential development would not be appropriate within the 400 metre SPA buffer, however, it may be suitable for other uses.”

“A designated Conservation Area is located at Ockham village to the south of the PMDA.”

It should not be forgotten that Green Belt and “buffers” are also wildlife corridors – birds and wildlife on Ockham Common - and throughout nature reserves and other important bird and wildlife sites across the country and Europe and worldwide – they move! Some species are resident but move between various locations, others are migratory species who need to link up breeding and feeding sites using wildlife corridors and stop over sites. If these areas are destroyed then the ability for our native and migratory species will be irreparably damaged and the species will die out. Development close
to such internationally important wildlife and nature sites such as those found locally in Surrey and the North Downs can have a devastating and widespread effect way outside of the direct construction zone and developed site.

A Special Protection Area (or SPA) is a site designated under the Birds Directive. These sites, together with Special Areas of Conservation (or SACs), are called Natura sites and they are internationally important for threatened habitats and species. SPAs are areas of the most important habitat for rare (listed on Annex I to the Directive) and migratory birds within the European Union.

Wisley Airfield is located within a local plan Site of Nature Conservation Importance (SNCI). The Guildford Borough Sites of Nature Conservation Importance Surveys (2004 –2007) describes this SNCI as a “disused airfield with derelict tarmac runway, arable fields, semi-improved grassland and hedgerows. This site is selected for its importance for reptiles, plants and birds.

9 notable Surrey plant species have been recorded on the site.

In addition 3 RSPB red list bird species and 7 RSPB amber list bird species have been recorded on the site.

The site has an exceptional or good population of a number of reptiles and amphibians.”

*IUCN Red List has just been updated for 2016 – there are now more species to be considered that were noted above.

What measures will the Council going to take, should development of Green Belt go ahead, to translocate/compensate for the loss to humans and wildlife? Are they going to give financial compensation to village residents and businesses for loss of value to their homes due to insetting and loss of revenue during the disruption of the building phases. Will they compensated for the increase in respiratory, cardiovascular and other pollution related diseases that they and their children and pets will suffer?

Is there a more up to date wildlife survey by the Council? – latest report by Surrey Wildlife seems to be 2004-2007

About 80 percent of butterfly species are confined to narrow home ranges that can be as little as an acre, and they’re unlikely to migrate across even a half-mile of inhospitable ground to find another suitable habitat. So a neighbourhood of meticulously maintained lawns, or a single highway, can be fatal for a species. Some butterfly species also have complex relationships with local ant species. These kind of complicated relationships are easily jeopardized by change. Pollution, drainage schemes, and climate change are among the other landscape-scale factors threatening butterflies.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16939  Respondent: 15658145 / Waverley Borough Council (Elizabeth Sims)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy P5 - Thames Basin Heaths Special Protection Areas

This policy is consistent with saved Policy NRM 6 of the South East Plan and the Thames Basin Heaths Delivery Framework and so is supported.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy P5 – Natural England are broadly very supportive of this Thames Basin Heaths Special Protection Area (SPA) policy. The only element missing from this policy is reference to how the financial contributions will be secured by Guildford Borough Council. Would the Community Infrastructure Levy be used? We feel it is referencing this matter either within Policy P5 supporting text, or within the HRA which accompanies this document.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the fact that insufficient consideration has been given to the harm caused by over-development to the Special Protection Area, the Sites of Special Scientific Interest and the borough’s Conservation Area and heritage assets.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the fact that air quality concerns have not been taken seriously – air quality in many parts of the borough is in excess of the EU permitted levels. Additional traffic with exacerbate this situation impacting the health of all current and future residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the proposed Strategic SANG allocation at Long Reach, West Horsley as it “supports” the development of close to 1000 additional homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17602  
Respondent: 15688481 / Sally Lescher  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to policy P5 Thames Basin Heath Special Protection Areas

This policy is not robust enough. The mitigation (cash compensation) offered for development in the special protection area is so small as to be meaningless.

SANG (Suitable Alternative Natural Greenspace) is not beneficial since the sites identified or targeted are already green space. This is just using agricultural or wooded land as recreation land in order to justify building on other green spaces nearby. There is no actual increase in open space or environmental protection; instead, it is a ploy designed to permit building on otherwise protected areas. SANG – in part used to prevent dogs and cats attacking nesting birds – must also ensure that it is not using land which is adjacent to the Special Protection Areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17690  
Respondent: 15694113 / Claire Netherton  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Object to insufficient consideration being given to the environmental and ecological value of the site and the area around it, taking account of the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18711  
Respondent: 15733665 / Vortal Properties Ltd  
Agent: Shrimplin Brown (James Brown)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY P5: THAMES BASIN HEATHS SPECIAL PROTECTION AREAS
Our Client considers that in assessing the requirement for mitigation within five and seven kilometres of the SPA the threshold of 50 net new dwellings is too low and would place a further unreasonable restriction on development.

The supporting text states that 80% of visitors come from within seven kilometres of the SPA, however, this does not quantify the proportion from the outer reaches of the zone of influence (5-7 kilometres).

This consideration is more relevant to the larger strategic sites and it is suggested that a threshold of 100 or 150 units should be imposed. Furthermore, the uncertainty presented by the case by case assessment will curtail the delivery of sites and could stifle housing delivery.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
Paragraph 4.3.62 should be revised to state that SAMM contributions are held by Hampshire County Council and that Natural England only act as a host to the project.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp171/2053  **Respondent:** 17243169 / RSPB (Chloe Rose)  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2017 / Policy P5

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is **Sound?** ( Yes ), is **Legally Compliant?** ( )

**Thames Basin Heaths Special Protection Areas**

The RSPB welcomes the addition of the references to “avoidance” within Policy P5. We consider that the Policy is sound. 4.3.50a – The RSPB welcomes the new text proposed here.

4.3.51 and 4.3.54: The RSPB notes that these paragraphs contain some uncertainty about whether student accommodation is required to provide SANG and SAMM. This uncertainty appears to be down to the last two sentences of paragraph 5.3.54. We recommend revising that the text is amended to read “The need for student accommodation and other permanent accommodation, and other types of permanent accommodation not listed in paragraph 4.3.51, to provide SANG will be assessed on a case by case basis: it will be the responsibility of the scheme promoter to provide information through a Habitats Regulations Assessment that demonstrates that SANG are not required for that particular development because its residents will not cause a net increase in recreational pressure upon the SPA.”

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

5.3.54 should be amended to read “The need for student accommodation and other permanent accommodation, and other types of permanent accommodation not listed in paragraph 4.3.51, to provide SANG will be assessed on a case by case basis: it will be the responsibility of the scheme promoter to provide information through a Habitats Regulations Assessment that demonstrates that SANG are not required for that particular development because its residents will not cause a net increase in recreational pressure upon the SPA.”

Attached documents:

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**Comment ID:** pslp171/1593  **Respondent:** 17406209 / Guildford Vision Group (Andrew Black)  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2017 / Policy P5

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is **Sound?** ( ), is **Legally Compliant?** ( )

**POLICY P5 - Thames Basin Heaths SPA**

3.26 Policy P5 requires all sites of over 50 net new dwellings to provide avoidance and mitigation measures for the SPA. The importance of the SPA and mitigation is understood and respected by GVG. However the imposition of mitigation measures on individual town centres presents a viability constraint which favours use of green belt sites rather than brownfield.

3.27 There is already a good proportion of open space within the town centre (in a borough with 89% of the land designated as green belt). More would come forward if a deliverable masterplan is approved. This can be then counted towards provision of SANG land with no requirement to provide contributions to other land outside of the town centre.
3.28 Within Guildford much of the urban area is under provided for open space on a pro-rated basis, it is the surrounding common areas that give Guildford its character and, if preserved, these should be sufficient to provide sustainable alternative natural green space for any and all development in the town centre without requiring further SANG. The increased riverside park proposed by GVG (and the Allies and Morrison plans) would add to the provision of accessible green space for residents and visitors to the town centre.

3.29 It is therefore suggested that the requirement for town centre sites, developed as part of a comprehensive plan, to contribute to SANGs land is removed from the Local Plan to increase the viability of these sites to develop sufficient affordable housing units, and to help meet the additional infrastructure burden.

3.30 The Evidence Base includes a viability assessment dating from 2014 which is considered to be historic in plan making terms and should be updated. The Infrastructure Delivery Plan has gone from 'the developer will contribute' to 'funded by the developer' Affordable housing viability comes after SANG, CIL s106 and so forth. There is absolutely no indication in the Local Plan that a single affordable housing unit would be built on this basis.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp171/2098  **Respondent:** 17976417 / Thakeham Homes (Sir or Madam)  **Agent:** RPS Planning & Development (Cameron Austin-Fell BA)

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P5

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

5.32 This policy sets out the Council’s approach in relation to the protection of the Thames Basin Heaths Special Protection Area (SPA). The policy has recently introduced some further new text which indicates that where new developments are proposed in the zone of influence (between 400m and 5km linear distance), avoidance and mitigation measures must be delivered prior to occupation of new dwellings. In this context the Council needs to clarify in the text, as Waverley Borough Council have, that the term ‘avoidance’ relates to the provision or contribution towards Suitable Alternative Natural Greenspace (SANG) sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp171/1167  **Respondent:** 17979553 / Land to the East of White Lane, Ash (Sir or Madam)  **Agent:** Vortal Properties Ltd (Robert Symons)

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P5

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( Yes ), is Sound? ( No ), is Legally Compliant? ( Yes )

Whilst Vortal Properties support that residential developments over 50 dwellings can provide or contribute to appropriate SANG and SAMM measures, and will not be required to undergo Appropriate Assessment, it is deemed definition 4.3.50c is too restrictive on smaller scale developments.

The threshold of ‘over 50 net new residential units’ should be increased to ‘over 100 net new residential units’ so as not to constrain the ability for smaller allocations to come forward.

The removal of C2 development from the zone of influence is recognised in line with other Borough Council Local Plans
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Total records: 206.