Guildford borough Submission
Local Plan: strategy and sites

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

December 2017

Document 4 of 12

Sections covered
Policy E1: Meeting Employment Needs
Policy E2: Locations of new employment floorspace
Policy E3: Maintaining employment capacity and improving employment floorspace
Policy E4: Surrey Research Park
Policy E5: Rural Economy
Policy E6: The leisure and visitor experience
Policy E7: Guildford Town Centre
Policy E8: District Centres
Policy E9: Local Centres and isolated retail units
Policy D1: Place shaping
Policy D2: Sustainable design, construction and energy
Policy D3: Historic environment
Policy D4: Character and design of new development
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Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

Document part: Policy E1 - Meeting Employment Needs
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

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<tr>
<th>Comment ID: PSLPP16/11414</th>
<th>Respondent: 8559297 / Holy Trinity Amenity Group (Robert Bromham)</th>
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E1. Sustainable Employment. P63

While the town centre can be a suitable location for Offices (use B1a) – assuming that journeys to it are not made by car - it may not be so for **Research and Development** (B1b), which requires spacious sites and usually some industrial equipment and has comparatively low employee numbers. We ask for suitable qualification of this 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: PSLPP16/17683</th>
<th>Respondent: 8561377 / The Guildford Society (Julian Lyon)</th>
<th>Agent:</th>
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Guildford has had very low unemployment figures and in recent surveys has emerged as one of the wealthiest and best educated communities in Britain with successful high economic growth rates.

This successful development has been largely due to skilled worker inputs with very high value-added labour, especially around a cluster of economic activities outside the traditional town centre based on the Surrey Research Park, the University and hospital.

There is now a serious scarcity of housing for skilled workers who are key to the maintenance of existing facilities and enterprises such as schools, hospitals, public administration and of course highly specialised technical enterprises who not only make a great contribution to the Guildford economy but are also important to the British economy.

There are reliable reports that new companies are now reluctant, due to high housing costs, to establish themselves here.

While there is a need for welfare housing, recently the Office of National Statistics reported Guildford as the least deprived community in Britain.

This does not mean there are no problems in this area, but it needs to be seen in perspective with the need to sustain and encourage an efficient economy without which welfare social and environmental improvements cannot be sustained.

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

Attached documents:

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ddd) The Guildford Society agrees that Guildford has been one of the most economically successful towns over the past 30 years, and supports the importance of the University, Surrey Research Park and The Pirbright Institute as key enablers of the growth of high value enterprises with high value jobs. The Society also supports efforts to expand and retain existing corporate and professional services operations, particularly in the town centre.

ee) Employment provision is under threat from infrastructure deficit, there is evidence that businesses are put off by congestion, and a lack of high quality commercial space and affordable housing.

fff) The Guildford Society also notes the emerging desire, via LEPs and County Councils, to collaborate in an arc of towns around London, stretching from Cambridge via Oxford to Reading, Guildford and Ashford. This is a major opportunity for high tech businesses to collaborate. Guildford, with the right vision and leadership, can build on Guildford’s strengths. The Guildford Society believes the plan should have clear proposals to participate in this LEP driven strategy to ensure the town attracts high value employment to the town.

ggg) We are concerned the council has yet to plan for changes in the need for Retail space. Recent developments indicate retail is moving either to mega shopping centres e.g. White City Westfield type developments and to on-line shopping. It is also noted that the Gross Value Added of Retail employment is low. The Guildford Society believes the local plan needs to be built on an explicit aim to bring high value employment to the borough with retail development being restricted to local requirements e.g. supermarket expansion, and expansion of small retail offers or market space and restaurant space to support leisure in the town centre. The local plan makes no mention of these strategic choices, assuming ‘business as usual’.

hhh) The current Plan proposes a Guildford with a quantum leap in shopping space, in the town centre that will be inaccessible due to inadequate transport provision. New housing is scattered around the edges of the town centre, also with inadequate transport and other facilities. Proposed employment centres may exacerbate transport difficulties e.g. more cross-town commuting.

iii) Policy E1 has been revised to reflect the change in the lifetime of the Local Plan. However, as a result, the number of class B1 jobs has been increased from 3,200 to 4,100. The reason for this increase is unclear and has not been referenced within the summary of changes to the Local Plan which accompanies the document. However, in direct contradiction to this increase, the amount of floorspace allocated for these jobs has decreased from a range of 37,000-47,000 sq m to a range of 36,100 - 43,700. Again, the reason for this change remains unclear and requires further clarification.

jjj) The Guildford Society believes in enabling economic growth but it should be high quality, high value whilst delivering environmental quality for the community. The current draft Local Plan fundamentally fails to consider how this can be achieved in the planning area as a whole.

jjj. a) There needs to be a statement on employment priorities which highlights that professional workers with high GVAs have been largely responsible for Guildford’s impressive economic growth.
jjj. b) Due to high housing costs, many of these types of employees cannot afford to live here. jjj. c) Companies and Government utilities, hospitals and schools cannot recruit skilled staff.
jjj. d) Priority should be given to the provision of skilled worker housing. This does not eliminate the need for supporting less skilled workers, or for welfare housing, but recognises the need to strike a balance between them. Without promoting the most productive labour skills the others will not prosper.

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

Attached documents:
POLICY E1 - Meeting employment needs

We object to this policy.

1. We object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

1. The site is in any event subject to frequent flooding and contains ancient woodland and is unsuitable for development.

1. We object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

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

Attached documents:

Comment ID: pslp171/1496  Respondent: 8563169 / Send Parish Council (Debbie Hurdle)  Agent: Tibbalds Planning and Urban Design (Richard Crutchley)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E1

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

5. Employment Land Allocations in Send, Send Marsh, and Burnt Common

5.01 Send Parish Council object to the following proposals related to employment designations and allocations included within the 2017 draft Guildford Local Plan:

- Send Business Centre – designation changed from “Locally Significant Employment Site” to “Strategic Employment Site”.
- Site A58 – Land around Burnt Common warehouse – “Strategic Employment Site” providing a minimum of 7,000sqm employment floorspace.

The reasons for objections are set out below.

Send Business Centre – changed designation

5.02 As discussed in Section 4, the 2014 draft version of the Guildford Local Plan proposed to inset the Send Business Centre and the adjacent employment land, Site Allocation 67, from the Green Belt. The employment land proposed at Site Allocation 67 would have effectively extended the existing Business Centre by approximately 1.4ha. However, despite this proposed enlargement, in the 2014 draft Local Plan Policy 13 did not include Send Business Centre in the list of new Strategic Employment Sites.

5.03 The 2015 Employment Land Needs Assessment [ELNA], prepared as part of the evidence base for 2016 draft Guildford Local Plan, includes Send Business Centre in its list of Non-Strategic Employment Sites. The 2015 ELNA states that Send Business Centre has “indirect” strategic road access, “poor” access to amenities and facilities, and “very
poor” access to public transport [see Table 4.2 of the 2015 ELNA]. The report also states that there is no identified potential for intensification and/or additional floorspace. It is clear from this assessment that Send Business Centre is not an appropriate site for the development of further employment land.

5.04 In the 2016 draft version of the Local Plan, employment land Site Allocation 67 was removed, as was the proposal to inset Send Business Centre from the Green Belt. As discussed in Section 4.04 of this document, the reason for this was the allocation’s location in high sensitivity Green Belt. The removal of Send Business Centre’s proposed extension and insetting from the Green Belt reflected the findings of the 2015 ELNA, which correctly identified the shortcomings of the site with regard to further employment land development. In line with this, Policy E1 of the 2016 draft Local Plan included Send Business Centre in its list of Locally Significant Employment Sites.

5.05 The 2017 ELNA was prepared as part of the evidence base to the 2017 draft Guildford Local Plan and now includes the Send Business Centre in its list of Strategic Employment Sites. The 2017 ELNA states that Send Business Centre has “indirect” strategic road access, “good” access to amenities and facilities, and “good” access to public transport [see Table 4.1 of the 2017 ELNA]. The report also states that there is potential for intensification and/or additional floorspace to be provided.

5.06 Send Parish Council contest that the findings of the 2017 ELNA are completely unfounded and mark a significant departure from the findings of the 2015 ELNA published just two years previously.

5.07 Firstly, Tannery Lane, which forms the main access point to the Business Centre from Send village, is a rural single-track road with only irregular passing places for vehicles and as such is not appropriate for significant use by commercial vehicles. It provides no street lighting or infrastructure for pedestrians or cyclists and, as is correctly stated in the 2015 ELNA, constitutes poor access to the local amenities available in Send village. There have been no significant alterations to this road since the publication of the ELNA and, thus, it is unclear why the classification of access to amenities from Send Business Centre has changed from “poor” to “good” within two years. It is the opinion of Send Parish Council that a single-track country lane with no street lighting and no pedestrian or cycling infrastructure does not constitute the “good” access to amenities stated in the 2017 ELNA. In fact, it represents an unsafe environment for non-car users wishing to make use of local amenities and an inappropriate environment for a significant increase in vehicular traffic due to the characteristics of the road. As an access route for a Strategic Employment Site, Tannery Lane is fundamentally inappropriate, and as such the findings of the report need to be re-examined with relation to Send Business Centre.

5.08 In light of the changed designations at Send Business Centre, and the increase in housing numbers at Clockbarn Nursery, we would also suggest that the 2016 Strategic Flood Risk Assessment is revisited to include Send Business Centre in order to consider the impact of development on Tannery Lane’s flooding issues. The susceptibility of the area to groundwater flooding was clearly set out in the environmental statement [Volume 8, Water, prepared by Johns Associates.] submitted with the marina application.

5.09 Secondly, as correctly stated in the 2015 ELNA, access to public transport provision at Send Business Centre is very poor. The closest bus stop, which has only hourly bus services to Guildford and Woking, is located in Send village centre and is accessed by a ten-minute walk along the aforementioned Tannery Lane, lacking pedestrian infrastructure, cycle infrastructure, or street lighting. For the 2017 ELNA to refer to this situation as constituting “good” access to public transport does not make logical sense. It represents an unsafe environment for non-car users and, as such, would put increased traffic pressures on Tannery Lane. Send Parish Council calls on the findings of the report related to Send Business Centre to be re-examined.

5.10 Finally, the 2015 ELNA states that there is no potential for intensification and/or additional floor space at the Send Business Centre. This reflects the constrained nature of the site in light of its setting within high sensitivity Green Belt. In the 2017 ELNA, it is stated that there is potential at Send Business Centre for intensification and/or additional floor space. The report does not give an indication as to why this stance has altered in the two years that passed between the 2015 ELNA and the 2017 ELNA, nor how potential intensification and/or additional floorspace would be catered for at the Centre. It does not explain why such growth could not be accommodated in more appropriate locations.

5.11 There are no explanations readily available in the 2017 ELNA which seek to justify why Send Business Centre is proposed to be enlarged and re-classified as a Strategic Employment Site, nor why the classification of its access to public transport and local amenities have been upgraded so significantly when no improvements or alterations have occurred.
with regard to these matters between 2015 and 2017. Send Parish Council believe that these changes are unfounded in available facts and represent a questionable approach to assessing the Borough’s current and future stock of employment land.

5.12 Policy E1 of the 2017 draft Local Plan includes Send Business Centre within its list of Office (B1a) and Research & Development (B1b) Strategic Employment Sites. No explanations for this change of designation are included in the Local Plan document itself. The Employment Topic Paper, prepared as part of the evidence base for the 2017 draft Local Plan, identifies the 1.4ha Tannery House site adjacent to the Send Business Centre. It states, “Although it [the Tannery House site] remains in high sensitivity Green Belt the unique nature of the site and the existing infrastructure in place means it is considered appropriate for development” [paragraph 4.43 of the Employment Topic Paper]. The Topic Paper goes on to state that significant investment, which has already been secured, will help create an estimated 400 new direct and indirect jobs [paragraph 4.47]. In addition to this in states that “longer term there is potential for significant expansion of 6-7,000sqm on the land adjacent [paragraph 4.49], although it is unclear where this expansion would occur.

5.13 Send Parish Council deem this change of Send Business Centre’s designation and its proposed enlargement wholly inappropriate and unjustifiable. Send Business Centre is located in high sensitivity Green Belt unsuitable for significant development and accessed via infrastructure that is simply unsuitable for supporting the proposed changes at the Centre.

5.14 The Employment Topic Paper states that funding in the Send Business Centre could create an estimated 400 new direct and indirect jobs. Assuming that at the very least 300 of these are direct jobs, this would mean 300 additional employees accessing the Centre. Given the inadequacy of the public transport offer, the likely means of accessing the site is by private car (even if we assume that some employment could be generated locally). The existing car park at the Centre is insufficient for such demand. The single-track Tannery Lane appears unable to deal with such an increase in traffic stress that these movements would bring, without factoring in any additional commercial vehicles visiting the centre. As discussed above, access to local amenities and local public transport provision is similarly inappropriate, with no street lighting provided on Tannery Lane and no pedestrian and cycling infrastructure. Furthermore, the Topic Paper states that there is potential for a significant expansion of 6-7,000sqm of employment space on the land adjacent to the Centre, yet it is unclear whether the jobs created from this floorspace is included within the aforementioned 300+ jobs. If not, then this would mean even greater stress on infrastructure that seems simply unable to cope.

5.15 Changes sought to make the Local Plan sound:

- Remove the proposal to change the designation of Send Business Centre from Locally Significant Employment Site to Strategic Employment Site;
- Remove the proposal to enlarge Send Business Centre by insetting Centre and adjacent land from Green Belt

A58 – Land around Burnt Common warehouse – a minimum of 7,000sqm employment (B1c/B2/B8) floorspace

5.16 The 2014 draft version of the Local Plan included Site Allocation 74, which proposed employment-led mixed-use development on the land around Burnt Common warehouse. This allocation was subsequently removed from the 2016 draft version of the Local Plan, with proposed housing and employment development relocated to the newly created Site Allocation 43 – Garlick’s Arch. This allocation proposed 400 new homes and up to 7,000sqm of commercial (B1c/B2/B8) uses (our emphasis). During the consultation process for the 2016 draft Local Plan, Send Parish made representations against this proposal, which was inappropriate for the site.

5.17 The draft 2017 Local Plan removes the allocation for commercial development from Garlick’s Arch and relocates it back to the land around the Burnt Common warehouse site. Policy E1 includes the land around Burnt Common warehouse within its list of proposed Strategic Employment Sites, while Policy A58 outlines the allocation for the site for a “minimum of 7,000sqm of either or a mix of light industrial (B1c), general industrial (B2), and storage and distribution (B8) with a potential for further industrial floorspace to meet future borough needs” (our emphasis). No residential element is included in this site allocation.

5.18 Send Parish Council does not object to the principal of employment land development on this site. Indeed, in representations made to the draft 2016 version of the Local Plan, Send Parish Council proposed that Guildford Borough Council re-instate the previous allocation for industrial development on Land around Burnt Common Warehouse.
However, Policy A58 does not provide an appropriate limit to the scale of industrial development to take place on this site. The previous allocation for employment land at Garlick’s Arch stated that up to 7,000sqm of employment floorspace would be created. No such maximum exists within Policy A58, with at least 7,000sqm of employment land proposed on Land around Burnt Common Warehouse. Send Parish Council deem this approach unacceptable as it opens the door to a significant intensification of employment uses on the site which would not be suitable for the site.

5.19 Proposed changes to make the Local Plan sound:

- Provide an upper limit for the amount of employment floorspace to be created within Policy A58 – Land around Burnt Common warehouse.

Summary of Employment Land Provision within Send

5.20 Send is a village of approximately 2,300 people, while Send Marsh/Burnt Common has a population of approximately 1,900. In the May 2014 Settlement Hierarchy Document prepared by Guildford Borough Council as part of the evidence base for the 2014 draft Local Plan, Send, Send Marsh/ Burnt Common are considered to be large villages. Chapter 4 of this document recognises that Send Marsh/Burnt Common is only identified as a large village due to its proximity to Send’s services. Send itself has modest public and commercial amenities, with few additional amenities provided in Send Marsh/Burnt Common. Both villages have limited access to public transport – served only by hourly bus services which pass through the villages en route between Woking and Guildford – but have good links to the strategic road network.

5.21 The draft Local Plan proposes the creation of two Strategic Employment Sites in the Send Parish. On Send’s current designated Employment Sites, there exists 7,800sqm of employment floorspace. The creation of two Strategic Employment Sites in the Send Parish would increase the employment floorspace within designated employment sites within the Parish to at least 21,000sqm should only the minimum 7,000sqm be provided at Burnt Common. This figure is likely to rise should further employment land be developed at Burnt Common.

5.22 While Send Parish Council recognises the importance of developing a strong rural economy, this significant increase in employment land within the Parish is unsustainable and uncalled for. Send Parish does not have the requisite amenities, facilities, and infrastructure to support two Strategic Employment Sites within its boundaries.

5.23 Changes sought to make the Local Plan sound:

- Maintain existing designation of Send Business Centre as Locally Significant Employment Site.
- Provide an upper limit for the amount of employment floorspace to be created within Policy A58 – Land around Burnt Common warehouse.

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

Attached documents:
In brief: Proposed new office and industrial land area are located on western side of Borough, remote from West Horsley

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

Attached documents:

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**POLICY E1: Sustainable employment**

WHPC supports the general policy statements made in this policy. However sustainability is not served by the location of the new office space and industrial land area proposed being on the opposite side of the Borough to West Horsley, giving rise to more to / from work car journeys for residents of the proposed new housing developments in the village. This does not fit with sustainable development as set out in NPPF para 7.

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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<th>2017 WHPC position</th>
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<td>E1 – Meeting employment needs</td>
<td>Supports Neutral</td>
<td>Proposed new office and industrial land area are located on western side of Borough, remote from West Horsley</td>
<td>Supports</td>
<td>Contrary to national trends, too much potential development land within the town centre is being allocated for retail or commercial development rather than housing. High added value businesses are welcome in the borough, but much of the employment land is designated for retail or low added value employment floorspace, which only exacerbates the current issue of lack of low cost housing.</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: PSLPP16/7773  Respondent: 8566529 / Derek Corden  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1  

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

I confirm that I act on behalf of the tenants of No. 4 Kernel Court, Walnut Tree Close, Alifabs Design & Construction Limited and Aluminium Building Products Limited and am instructed by them to submit comments in respect of The Local Plan.

Background  

The site is presently in industrial/warehouse use and under Policy A13 on Page 153, the allocation is for 100 homes.

Para 2.8: Under paragraph 2.8 of the draft Local Plan, it is pointed out that the number of jobs in the Borough continues to grow and that new employment land is required to sustain such growth. Employment land is categorised as Bla & Blb (in effect offices) and then Blc, B2 & B8 which is, in effect, industrial and warehousing.

Notwithstanding the acknowledgement that new employment land is required, The Local Plan does not provide sufficient Blc, B2 & B8 to meet the employment needs, with a mere 4.7 - 5.3 hectares being allocated over the plan period. This would account for a new supply of approximately 1,500 sq m per annum, which does not comply with Policy El in which it is stated that "we will support the retention, creation and development of small local businesses by encouraging a range of types and sizes of new premises, including incubator units, managed workspace and serviced office accommodation. "

The opening paragraph of Policy El states that the purpose of the Policy is to "ensure an adequate supply of land is available for employment purposes".

Firstly, the allocation fails to support existing businesses, but secondly fails to make provision for employment for the new population which will arrive with the additional houses that are to be built. Thirdly it is proposed to remove this and other sites from employment use without adequate replacements. We believe that that Borough Council has a duty to provide sufficient land for Blc, and it has failed to 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: PSLPP16/7776  Respondent: 8566529 / Derek Corden  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1  

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

Page 20 sets out a vision and ambition and in particular, proposes an extension to The Surrey Research Park of approximately 11 hectares, to comprise 35,000 sq m of business premises.

The Property & Transport side of the Guildford Business Forum considers the University and The Surrey Research Park to be tremendous assets to the town and their expansion should be encouraged. However, the University is not an
organisation that is prepared to build speculatively and therefore, reacts to a relatively small number of organisations who are able to plan, say two years ahead. This represents only a fraction of the market place for new occupiers, the vast majority of whom rely on premises being available in a three-six month period.

In the existing 2003 Local Plan, the Borough Council allocated their own property holdings at the Slyfield Industrial Estate as the new land supply. Once again, the land was placed in the hands of an organisation who would not build speculatively and therefore, did little to assist in providing expansion facilities for existing companies, let alone new ones. We believe that you cannot put all your eggs in one basket and this is, therefore, a flawed policy.

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Under Policy E1 an average of 5 hectares is being provided over the plan period for B1c, B2 & B8 amounting to approximately 1,486 sq m per annum. We consider this allocation to be totally insufficient to cater for existing businesses, let alone an expanded workforce and a balanced economy.

Furthermore, this document proposes losing existing B1c, B2 & B8 sites and the allocation is not adequate for their replacement, let alone expansion of the economy or catering for the needs of local businesses.

Under the section headed "B Class Uses" and in particular strategic employment sites, there are sites that are missing from here that are of major significance. For example, whilst you have identified the Guildford Business Park, you have not included nearly 16,000 sq m of offices known as G2000 and G3000 where Regus and Avaya are.

Under the heading "Industrial (B1c, B2 & BB) Strategic Employment Sites" you have noted The Guildway on the Portsmouth. This, in fact, is an office site not industrial. Within the same Policy, there is a heading "Locally Significant Employment Sites". Specific sites are mentioned at 32 Chertsey Street and 1-7 Stoke Road, Andrews House, College Road, College House, Stoke House, Leapale House and Bell Court and 65 Woodbridge Road. However, all of these sites are located within the proposed town centre boundary and therefore, surely should fall under the definition of Strategic Employment Sites in the Guildford Town Centre Employment Core.

Another site described as a locally significant employment site is The Courtyard at Wisley. It would be surprising if this totalled more than 1,000 sq m, but significantly the Plan seeks to remove a site several times larger at Broadford Park, Shalford. This provides an unusual mix of light industrial and office accommodation, which is not typically provided elsewhere in the Borough and therefore, represents a scare resource. We wonder why this is being taken away from employment use. We believe that it falls within the definition set out in 4.4.7.

Under the section "Monitoring Indicators", the source for monitoring is Planning Applications and Appeals. However, these are simply pieces of paper and not buildings within which people can obtain jobs. The Monitoring Indicators should, therefore, be buildings constructed.

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

Attached documents:

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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy E1</td>
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</table>
5. OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

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

I object to policy E1 sustainable employment

I note that there is a significant reduction of between 71% and 79% in the previous job target and resultant 79% reduction in employment space in response to the many objections lodged in 2014 against an unsubstantiated agenda for economic expansion in the last draft and based on new findings by Aecom in the latest ELNA 2015.I have concern as to the ill-informed clustering of all B classes in terms of the clarity of market evidence required to inform effective planning and a failure to provide a clear understanding of business needs required under Section 160 of the NPPF. I also note the dramatic reduction in assessed demand by two Employment Land Needs Assessment Reports carried out under the same terms of reference within a period of 2 years which calls into question the general reliability of the process of collection and interpretation of data in the overall forward planning process by GBC. I am concerned however that the research undertaken by Aecom is generally superficial and lacks sufficient detail and analysis between B1a, B1b, B1c, B2 and B8 use classes and that no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of office, research and development, light industrial, general industrial and warehousing and distribution floor space. No proper analysis has been made of data held by GBC in respect of different B classes in terms of planning applications granted or evidence gathered by the economic development function at GBC and no robust assessment of local market demand apart from fairly brief references to freely available market research undertaken by commercial estate agents such as Lambert Smith Hampton covering a much wider area.GBC appear to fail to appreciate the fundamental rationale of the Use Classes Order as a planning tool in terms of useful property market research or forward planning. What we are left with is a fairly clumsy and poorly informed plan which clusters B classes without any appreciation of widely different employment impact and economic sustainability. E.g. B1 generates at least 5 times as much employment as B8. The lack of appreciation as to the opportunity for widely different uses being generated within B class clusters defeats the whole point of proper planning of employment uses and can significantly endanger previously good planning put forward in the previous 2003 plan. E.g. the creation of a research and development park linked to the University but now has the threat of being downgraded into a general business park (see below).Little regard has been given in the plan to the economic reality of falling demand for B2 industrial space which is clustered with other B classes almost randomly throughout the plan. Little regard is given to the opportunity of B1b space as an opportunity for research and development which needs to be nurtured and preserved without the detrimental and confused clustering with other B classes both in terms of planning and promotion of a research hub. I note that the past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 derived from VoA analysis and that the calculated annual floor space

Comment ID: PSLPP16/2187  Respondent: 8570273 / Fiona Curtis  Agent: Fiona Curtis

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
demand is 0.7% over the plan period up to 2033. I support the concept of seeking increased investment in our local knowledge-based, high technology economy. This will provide well paid, creative jobs and generate the funding necessary to pay for the infrastructure and environment this sort of industry requires. We need to distinguish between wanting to increase the added value of the economy and physical expansion, especially given the scarcity of land in Guildford. Guildford is not the place for large space hungry businesses. So I should target high added value small and medium sized enterprises rather than the headquarters of larger corporations.

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

Attached documents:

<table>
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<th>Respondent: 8570273 / Fiona Curtis</th>
<th>Agent:</th>
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Policy E1

Replacement of 'Sustainable employment needs' with 'Meeting employment needs'

I object to this omission. It is up to local authorities to balance the economic guidance received with the need to provide a sustainable plan. It is therefore important to retain sustainability at the heart of the plan and not forget that LEPs are one of many formal consultees. Failure to balance the needs of all could result in a plan that is LEP / economy driven and balance would be lost.

Policy E1

9

The criteria used to determine the significance of an employment site appears to be based on space and the amount of land it takes up and does not account for value / number of people it employs? This means farms with relatively low turn over and staff numbers are mapped whilst their contribution to the economy is relatively small? All sites meeting the criteria are added to the list, which currently only lists 9 sites? Protection of sites must surely be based on a much wider remit than space alone and I would recommend that this policy be reviewed to encourage efficient use of space and monitoring indicators based on the contribution to our economy.

Indicators

I am concerned that the emphasis on B8 class jobs (storage & distribution) will lead to land hungry warehousing and increases in large trucks and lorries on our roads which are already amongst the most congested roads in the UK. Very few jobs are generated from warehousing and the salaries commensurate with this business class add to pressure on affordable housing. I would prefer to see a greater emphasis on A2 and B1

Object

Comment

I object to the ongoing poor quality of the updated research undertaken by Aecom. The Employment Land Needs Assessment 2017 is superficial and lacks sufficient detail and analysis between B1a, B1b, B1c, B2 and B8 use classes and no reliable analysis has been undertaken of the widely different supply and demand dynamics of the
categories ie. office, research and development, light industrial, general industrial and warehousing and distribution floor space.

The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

38,357sqm of B1c, B2 or B8 use class is quite sufficient supply for the plan period and does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced in part by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

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

Attached documents:

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Comment ID: PSLPP16/13042  Respondent: 8573793 / Harry Eve  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

I object

67. I am not satisfied that the evidence is sound and it appears to me that, rather than meet existing employment needs in an area of low unemployment and concentrate on what Guildford is good at (i.e. high tech), this is a policy to create more employment needs to justify excessive housing growth in an area that cannot support it. The second paragraph – “The Plan aims….” Seems contrary to the likely outcome if this plan goes ahead. The Plan is likely to create conditions that make Guildford less attractive to businesses.

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

Attached documents:

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Comment ID: pslp171/1692  Respondent: 8573793 / Harry Eve  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy E1  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

4.4.3(a) mentions the role of the Enterprise M3 LEP in determining local priorities. The LEP is an unelected body covering a wide area and should have no power or influence over planning priorities in Guildford especially as they are focussed on growth for their area regardless of consequences for local people. I object to the influence that the LEP is having on the local plan process.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5957  Respondent: 8575585 / Ian Macpherson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

Policy E1: Meeting employment needs

One unlisted locally significant employment site uses and supplements former pig rearing sheds on Manor Farm alongside the old Portsmouth Road at Artington. It has achieved its present position by stealth. It is most unsightly [fly boards and other tat along the road, as well as the unattractive hoardings on the sheds] but occupies very high amenity land - Green Belt and River Valley. Now quite inappropriate. It would be good to have it removed or reverted to agriculture or used for car parking behind trees and hedges [as the existing Artington P&R, which now is quite well hidden and so not inappropriate for its placing].

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

Attached documents:

Comment ID: PSLPP16/7006  Respondent: 8575617 / Effingham Parish Council (Ian Symes)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

E1, E2, E3, E4, E7 Economy – No Comment

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

Attached documents:

Comment ID: PSLPP16/17555  Respondent: 8581505 / Burpham Neighbourhood Forum (Jim Allen)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

This policy is another indication of illogical thinking. The only ‘Sustainable Employment’ is in the food supply chain, no other jobs can be considered ‘sustainable’ – they are simply here for the present and gone in the future.

Stagecoach manufacture, busy in the 1700’s, vanished in the 1800’s, when trains arrived. These were destroyed in the 1960’s by Beeching. Now we have the motor car.
This policy should have the wording changed to reflect the transitory nature of the work place over the next 20 years. The word ‘Sustainable’ should be removed from its title.

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

**Attached documents:**

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**Comment ID:** pslp171/2194  **Respondent:** 8581505 / Burpham Neighbourhood Forum (Jim Allen)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy E1

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

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### 4.0 Policy E1

#### 4.4 Economy Policies

**4.4.3a**

Insert “Due to failure of transport Infrastructure” after ‘Locations’

[Page 70, paragraph 4.4.2]

Reinstate full description of EM3 MEP

Note: Too many unfamiliar TLA’s confuse the reader throughout the document; it should be a policy of the documents layout to use no abbreviations unless they are in common use.

[Page 70, paragraph 4.4.3a]

**4.4.5**

Industrial expansion figures are miscalculated with knock on effect to employment and housing, etc. The SHMA, as previously stated, is incorrect so industrial requirements are also mismatched.

**4.4.6**

Retain definition of ‘ELNA’ at least once.

---

**Policy E1**

As the SHMA housing figure is excessive by 30%, consideration needs to be made to the resultant change in the required level of industrial floor space and subsequent jobs ‘needed’ to create ‘full’ employment. A rough calculation would indicate a reduction in employment requirements to 3,200 jobs.

Item ‘D’ does not make sense.

[Page 71, paragraph Policy E1 (5)]

Within this policy, SCC depot was planned to be moving to the Slyfield Industrial Estate extension. No mention is made of this in this policy. In previous iterations of the Plan this proposal was included. Is this proposal still current? Is it no longer proposed that SCC would move sites? Furthermore, what is the knock on effect to the expansion of Slyfield Industrial Estate, which was primarily based on both GBC and SCC effectively amalgamating onto the extension site?

**4.4.7**

‘ELNA’ should be left expanded for ease of reading in all cases specifically within the definitions section.

**4.4.8**

There is no safe-guarded land for infrastructure: with both Burnt Common and Gosden Hill identified for some industrial
use a strong infrastructure link to the A3 is a basic requirement. However no rational provision has been made for northbound (A3) access to Gosden Hill or southbound Burnt Common, nor access to Gosden Hill from Burnt Common. Thus, should a company decide for whatever reason to take up opportunities on both sites they are unable to access one from the other without considerable mileage in both directions for what is less than a quarter of a mile as the crow flies. Does the statement below tally with the current SCC waste management plan considering that SCC is apparently not moving from Merrow Business Park? Currently the waste management plan is under review, thus item 10 is ambiguous.

[Page 73, paragraph (10)]

4.4.7 The figure for meeting employment needs is one third higher than required as homes needed is approximatly 7,000 not 10,000.

4.4.8 Reviewed every 3 years.

4.4.11a Habitat Regulation Assessment: has this been defined? Yet another tla to remember...

BDES 2013 – 2031 (old dates) (3) enterprise M3 2014;

The document has not been publically scrutinised by the community and is not available under that description on the GBC Local Plan website. The document promote’s Guildford as a ‘growth town’, yet there is no mention of this growth town in the Local Plan; nor have the residents of the Borough been consulted about this status. Does this document fundamentally affect the Local Plan? If so why is it not more widely published within the evidence base? There is no mention of what these ‘improvements’ mean in respect of the Local Plan provisions.

This document is promoting rail infrastructure with no cooperation with Network Rail. This misleads the LPA in that no station is planned at Gosden Hill within the life of the Local Plan.

[Image]

[Image]

[Image]

[Image]

No other mention of these proposals is included within the rail report, yet specific mention is made of other projects including CrossRail and Heathrow southern link, suggesting Network Rail give the proposal little merit.

Enterprise M3 statements referring to Guildford; Not one aspect of the strategic package has been consulted on with the community of Guildford and the document is not available on GBC web site. This organisation appears to have undue influence on the Local Plan while being totally unaccountable to the community which will be affected.

[Image]

The alleged Interchange improvements are not going to happen until post 2030 according to Highways England and their commitments schedule. No details exist in the public forum to allow them to be studied in detail.

[Image]

Again, this document is supporting a non-existent, non-achievable goal [see above]. Clearly the writer of this M3 document has little knowledge off the situation in Guildford, as they refer to corridor improvements ‘near’ Guildford when in reality the improvement is needed to be ‘along the length of the A3 through Guildford.
So the unaccountable Enterprise M3 can ask for road improvements to be accelerated yet, when the community ask for the same improvements, they are ignored.

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

Attached documents:  

Comment ID: PSLPP16/12169  Respondent: 8582017 / The Clandon Society (J Wright)  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1 
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

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

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Comment ID: PSLPP16/13494  Respondent: 8582977 / Guildford Environment Forum (John Bannister)  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1 
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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<td>Economic Policies:</td>
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<th>Agent: Strutt &amp; Parker LLP (Rachel Patch)</th>
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<tr>
<td>We support the aim of an additional 3,200 additional B Class jobs to 2033, although this should not be interpreted as a ceiling. Although not a strategic employment site the Loseley Estate has a number of businesses on the estate which make an important contribution to local employment opportunities.</td>
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<td>Policy E1 - Meeting Employment Needs</td>
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<td>Permitted development allows commercial properties to be converted to residential use, but at a loss of employment opportunities. I object to development of brownfield sites without some commercial activity being included, proportionate to the size of development, unless exceptional circumstances prevail.</td>
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Policies E1 – E3 – we note that the required provision of new office and research & development floorspace and industrial land has been revised based on the updated Employment Land Needs Assessment and that three additional strategic employment sites have been designated. We support this robust analysis and these policies. We would however still be concerned about the delivery of the economy policies if one or more of the key development sites for employment use were not able to proceed due to transport or other reasons.

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

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<tr>
<td>POLICY E1 - Meeting employment needs We object to this policy.</td>
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This should be renamed Employment or “Sustainable Employment” defined.

As the majority of the large scale employment is office based and not dependant upon being in Guildford the biggest threat to continuing employment is poor transport provision. If the owners of businesses no longer enjoy being in Guildford they can simply move their operation to a location that has appropriate transport infrastructure and move their jobs with them. The Plan is unsound as it does not address the existing infrastructure problems or provide infrastructure to deal with economic growth.

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

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<td>Policy E1. We note and support the inclusion of Broadford Business Park as a Locally Significant Employment Site and note its removal as a site for housing development.</td>
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<td>E1 Sustainable Employment (Research Park and Slyfield) Support.</td>
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Policy E1: Sustainable employment

Response

Summary

I OBJECT because:

- the evidence base is unreliable
- there is unclear differentiation between B class uses
- only high added-value business uses are desirable, not low grade, low employment warehousing which is land hungry
- industrial and commercial businesses must be concentrated in the urban area, or existing business parks (eg Slyfield) not in the rural environment which the infrastructure is unable to support
- the rural environment must support micro or high tech businesses, agricultural industries, and tourism, and these sectors must not be damaged by general industrial development which is inappropriate

Detailed response:

I OBJECT to this policy.

I need to distinguish between wanting to increase the added value of the economy and physical expansion, especially given the scarcity of land in Guildford. Guildford is not the place for large space hungry businesses. I believe Guildford should target high added-value small and medium sized enterprises or the headquarters of larger corporations, but not provide low added value warehousing and industrial space.

GBC appear to fail to appreciate the fundamental rationale of the Use Classes Order as a planning tool in terms of useful property market research or forward planning.

No proper analysis has been made of data held by GBC in respect of different B classes in terms of planning applications granted or evidence gathered by the economic development function at GBC without any attempt at real market demand apart from vague references to freely available market research undertaken by commercial estate agents. (See definitions of B classes at end of this policy response).

What I are left with is a fairly clumsy and poorly informed plan which clusters B classes without any appreciation of widely different employment impact and economic sustainability. E.g. B1 (mostly local office use/R&D) generates at least 5 times as much employment as B8 (distribution and warehousing).

This draft Local Plan is partly based on new findings by Aecom in the latest ELNA 2015 [Employment Land Needs Assessment 2015]. This includes the recasting of the ELNA by Aecom in 2015 which updated the ELNA 2013 prepared by GBC. I have had regard to the evidence base provided by Aecom in the 2015 ELNA and find it a more reliable evidence base for overall projected employment in the borough over the plan period in overall numbers than done previously by GBC in 2013. However, I have concern that the survey work by Lambert Smith Hampton is in the form of high level free property research that is used for the purposes of marketing their services over a wide area not specifically commissioned for the borough of Guildford and undertaken for ELNA purposes.

However, I am concerned that the research undertaken by Aecom is generally superficial and lacks sufficient detail and analysis between B1a, B1b, B1c, B2 and B8 use classes and that no reliable individual analysis has been undertaken of
the widely different supply and demand dynamics of office, research and development, light industrial, general industrial and warehousing and distribution floor space.

The lack of appreciation by GBC as to the opportunity for widely different uses being generated within B class clusters defeats the whole point of proper planning of employment uses and can significantly endanger previously good planning put forward in the previous 2003 plan. I support the concept of seeking increased investment in our local knowledge-based, high technology economy. This will provide well paid, creative jobs and generate the wealth necessary to fund the infrastructure and environment this sort of industry requires.

I need to promote the idea of new knowledge transfer in incubator units and small premises for new start up enterprises. We need to be on the wave of innovative new technology as opposed to older established businesses. High value-added industry is desirable; low tech, land-hungry older businesses which will increase congestion are not desirable.

I have concern as to the ill-informed clustering of all B classes. This is unclear in terms of market evidence required to inform effective planning. There is a failure to provide a clear understanding of business needs within the relevant area as required under Section 160 of the NPPF.

Little regard has been given in the plan to the economic reality of falling demand for B2 industrial space which is clustered with other B classes almost randomly throughout the plan.

Little regard is had to the opportunity of B1 b space as an opportunity for research and development which needs to be nurtured and preserved without the detrimental and confused clustering with other B classes both in terms of planning and promotion of a research hub.

I do not support the policy of creating Strategic Employment sites outside the urban centres.

Some of the strategic industrial sites would be better classified as brownfield land suitable for use as a residential area, eg Woodbridge Park, Woodbridge Road and Merrow Lane.

This study varies very significantly from the previous Guildford Borough Council ELNA 2013, which after two years has been completely re-written. This leads us to question the reliability of the evidence base here which has been used to justify the assumptions and plans; it is unclear that the current evidence base is any more reliable than that used previously. This calls into question the general reliability of the process of collection and interpretation of data in the overall forward planning process by GBC.

DEFINITIONS:

B1 Business

B1 building use is use for all or any of the following purposes:

(a) as an office other than a use within class A2 (financial and professional services),

(b) for research and development of products or processes, or

(c) for any industrial process, being a use which can be carried out in any residential area without detriment to the amenity of that area by reason of noise, vibration, smell, fumes, smoke, soot, ash, dust or grit.

General Industrial

B2 building use is for the carrying on of an industrial process other than one falling within class B1 above or within classes B3 to B7 below. (Note: B3-B7 relates to very heavy industry such as oil refining, smelting etc).

Distribution or Storage

B8 building use is for storage or as a distribution centre.
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? ( )

We OBJECT because

- the evidence base is unreliable
- there is unclear differentiation between B class uses
- only high added-value business uses are desirable, not low grade, low employment warehousing which is land hungry
- industrial and commercial businesses must be concentrated in the urban area, or existing business parks (eg Slyfield) not in the rural environment which the infrastructure is unable to support
- the rural environment must support micro or high tech businesses, agricultural industries, and tourism, and these sectors must not be damaged by general industrial development which is inappropriate

Full response

We OBJECT to this policy.

We need to distinguish between wanting to increase the added value of the economy and physical expansion, especially given the scarcity of land in Guildford. Guildford is not the place for large space hungry businesses. We believe Guildford should target high added-value small and medium sized enterprises or the headquarters of larger corporations, but not provide low added value warehousing and industrial space.

GBC appear to fail to appreciate the fundamental rationale of the Use Classes Order as a planning tool in terms of useful property market research or forward planning.

No proper analysis has been made of data held by GBC in respect of different B classes in terms of planning applications granted or evidence gathered by the economic development function at GBC without any attempt at real market demand apart from vague references to freely available market research undertaken by commercial estate agents. (See definitions of B classes at end of this policy response).

What we are left with is a fairly clumsy and poorly informed plan which clusters B classes without any appreciation of widely different employment impact and economic sustainability. E.g. B1 (mostly local office use/R&D) generates at least 5 times as much employment as B8 (distribution and warehousing).

This draft Local Plan is partly based on new findings by Aecom in the latest ELNA 2015 [Employment Land Needs Assessment 2015]. This includes the recasting of the ELNA by Aecom in 2015 which updated the ELNA 2013 prepared by GBC. We have had regard to the evidence base provided by Aecom in the 2015 ELNA and find it a more reliable evidence base for overall projected employment in the borough over the plan period in overall numbers than done previously by GBC in 2013. However, we have concern that the survey work by Lambert Smith Hampton is in the form of high level free property research that is used for the purposes of marketing their services over a wide area not specifically commissioned for the borough of Guildford and undertaken for ELNA purposes.
However, we are concerned that the research undertaken by Aecom is generally superficial and lacks sufficient detail and analysis between B1a, B1b, B1c, B2 and B8 use classes and that no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of office, research and development, light industrial, general industrial and warehousing and distribution floor space.

The lack of appreciation by GBC as to the opportunity for widely different uses being generated within B class clusters defeats the whole point of proper planning of employment uses and can significantly endanger previously good planning put forward in the previous 2003 plan. We support the concept of seeking increased investment in our local knowledge-based, high technology economy. This will provide well paid, creative jobs and generate the wealth necessary to fund the infrastructure and environment this sort of industry requires.

We need to promote the idea of new knowledge transfer in incubator units and small premises for new start up enterprises. We need to be on the wave of innovative new technology as opposed to older established businesses. High value-added industry is desirable; low tech, land-hungry older businesses which will increase congestion are not desirable.

We have concern as to the ill-informed clustering of all B classes. This is unclear in terms of market evidence required to inform effective planning. There is a failure to provide a clear understanding of business needs within the relevant area as required under Section 160 of the NPPF.

Little regard has been given in the plan to the economic reality of falling demand for B2 industrial space which is clustered with other B classes almost randomly throughout the plan.

Little regard is had to the opportunity of B1b space as an opportunity for research and development which needs to be nurtured and preserved without the detrimental and confused clustering with other B classes both in terms of planning and promotion of a research hub.

We do not support the policy of creating Strategic Employment sites outside the urban centres.

Some of the strategic industrial sites would be better classified as brownfield land suitable for use as a residential area, eg Woodbridge Park, Woodbridge Road and Merrow Lane.

This study varies very significantly from the previous Guildford Borough Council ELNA 2013, which after two years has been completely re-written. This leads us to question the reliability of the evidence base here which has been used to justify the assumptions and plans; it is unclear that the current evidence base is any more reliable than that used previously. This calls into question the general reliability of the process of collection and interpretation of data in the overall forward planning process by GBC.

DEFINITIONS:

**B1**

**Business**

B1 building use is use for all or any of the following purposes:

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**General Industrial**
B2 building use is for the carrying on of an industrial process other than one falling within class B1 above or within classes B3 to B7 below. (Note: B3-B7 relates to very heavy industry such as oil refining, smelting etc).

**Distribution or Storage**

B8 building use is for storage or as a distribution centre.

We note that there is a significant reduction of between 71% and 79% in the previous job target and resultant 79% reduction in employment space in response to the many objections lodged in 2014 against an unsubstantiated agenda for economic expansion in the last draft and based on new findings by Aecom in the latest ELNA 2015. We have concern as to the ill-informed clustering of all B classes in terms of the clarity of market evidence required to inform effective planning and a failure to provide a clear understanding of business needs required under Section 160 of the NPPF. We also note the dramatic reduction in assessed demand by two Employment Land Needs Assessment Reports carried out under the same terms of reference within a period of 2 years which calls into question the general reliability of the process of collection and interpretation of data in the overall forward planning process by GBC. We do not support the policy of creating a Strategic Employment site at Garlick's Arch (A43) in the Green Belt which is completely unnecessary due to the overall decrease in demand for industrial space which could be easily accommodated at Slyfield. We are concerned however that the research undertaken by Aecom is generally superficial and lacks sufficient detail and analysis between B1a, B1b, B1c, B2 and B8 use classes and that no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of office, research and development, light industrial, general industrial and warehousing and distribution floor space. No proper analysis has been made of data held by GBC in respect of different B classes in terms of planning applications granted or evidence gathered by the economic development function at GBC and no robust assessment of local market demand apart from fairly brief references to freely available market research undertaken by commercial estate agents such as Lambert Smith Hampton covering a much wider area. GBC appear to fail to appreciate the fundamental rationale of the Use Classes Order as a planning tool in terms of useful property market research or forward planning. What we are left with is a fairly clumsy and poorly informed plan which clusters B classes without any appreciation of widely different employment impact and economic sustainability. E.g. B1 generates at least 5 times as much employment as B8. The lack of appreciation by GBC as to the opportunity for widely different uses being generated within B class clusters defeats the whole point of proper planning of employment uses and can significantly endanger previously good planning put forward in the previous 2003 plan. E.g. the creation of a research and development park linked to the University but now has the threat of being downgraded into a general business park (see below). Little regard has been given in the plan to the economic reality of falling demand for B2 industrial space which is clustered with other B classes almost randomly throughout the plan. Little regard is had to the opportunity of B1 b space as an opportunity for research and development which needs to be nurtured and preserved without the detrimental and confused clustering with other B classes both in terms of planning and promotion of a research hub. We note that the past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 derived from VoA analysis and that the calculated annual floor space demand is 0.7% over the plan period up to 2033. We support the concept of seeking increased investment in our local knowledge-based, high technology economy. This will provide well paid, creative jobs and generate the funding necessary to pay for the infrastructure and environment this sort of industry requires. We need to distinguish between wanting to increase the added value of the economy and physical expansion, especially given the scarcity of land in Guildford. Guildford is not the place for large space hungry businesses. So we should target high added value small and medium sized enterprises rather than the headquarters of larger corporations. We need to promote the idea of new knowledge transfer in incubator units and small premises for new start up enterprises. They need to be on the wave of innovative new technology as opposed to older established businesses. We object to the policy of creating a Strategic Employment at Garlick's Arch (A43) in the Green Belt. The stated requirement of 7,000 sq m (B1c, B2 and B8) could easily be accommodated at the Slyfield Regeneration site of 40 ha.

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

**Attached documents:**
### 1. POLICY E1

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

**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: PSLPP16/2311  Respondent: 8671969 / Valerie Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

E1 Meeting employment needs

I object to a policy which promotes low employment warehousing

Industrial development should be concentrated in existing areas of development such as Slyfield, not placed in the rural environment.

Rural environments should be used for small businesses in redundant farm or other existing buildings or for tourism.

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

Attached documents:

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Comment ID: PSLPP16/1074  Respondent: 8687265 / Dagero Ltd (David Roberts)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

POLICY E1 - Meeting employment needs

I OBJECT because -

• The evidence base is unreliable;
• There is unclear differentiation between B class uses;
• Only high value-added business uses, contributing to a modern “knowledge economy”, are desirable, not low-grade, low-employment warehousing which is also land hungry;
• Industrial and commercial businesses must be concentrated in the urban area or existing business parks (e.g. Slyfield) not in the rural environment which the infrastructure is unable to support;

1. See footnote 3

• The rural environment must support micro- or high-tech businesses, agricultural industries, and tourism, and these sectors must not be damaged by general industrial development which 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: PSLPP16/2626  Respondent: 8693153 / Vicki Willetts  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

I OBJECT TO POLICY E1 (EMPLOYMENT):

• Poor evidence base.
• Too much encouragement to low added-value employment that’s needed elsewhere in the country.
• Fails to concentrate general business activity in urban areas or business parks that have the infrastructure.
• Fails to differentiate this from appropriate rural business.
• Too much encouragement of warehousing, for which Guildford is too congested.

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

Attached documents:

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Comment ID: PSLPP16/15020  Respondent: 8708545 / Nigel Wicks  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

I object to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be
I object to site Policy E1 Burnt Common, which has now become a ‘Strategic Employment Site’ for the reasons set out in the submission of West Clandon Parish Council. As a consequence of the change, the overall burden on West Clandon, in terms of traffic and congestion, of the proposed minimum (my italics) of 7000sq m of industrial space is greater than the now deleted up-to (my italics) 7000 sq m from the neighbouring site A43 Garlick’s Arch. This is a net gain in traffic and congestion in this area.

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:** PSLPP16/4726  **Respondent:** 8711841 / Rosmarie Roberts-Kunz  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

I OBJECT TO POLICY E1 (EMPLOYMENT):

• Poor evidence base.
• Too much encouragement to low added-value employment that’s needed elsewhere in the country.
• Fails to concentrate general business activity in urban areas or business parks that have the infrastructure.
• Fails to differentiate this from appropriate rural business.
• Too much encouragement of warehousing, for which Guildford is too congested.

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

Attached documents:

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**Comment ID:** PSLPP16/9059  **Respondent:** 8723809 / Sally Blake  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

I object to POLICY E1 - Meeting employment needs

• The evidence base is unreliable;
• There is unclear differentiation between B class uses;
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I object to the changed statement in para 4.4.4 of the introduction to policy E1 that:

“Innovative industries have emerged and clustered, some based at the Surrey Research Park and the University of Surrey and others in the town centre, such as electronic gaming, stem cell research and satellite technology. The borough has benefited from strong cluster growth in high tech innovative businesses including healthcare and bioscience and satellite technology.”

The rhetoric around the Surrey Research Park being a “hub” or “cluster” for these specialist industries is a myth created by the owner, the University of Surrey. The “hub” for these sectors is not in Guildford, but the whole of the South-East, including places such as Whitehill & Bordon, Basingstoke, Bracknell and Reading, and the East Midlands (in terms of satellite technology). The developer of Send Business Park is using this same rhetoric, claiming its Tandridge Studios site is a “hub” for the digital-creative sector:
“Tandridge Studios is complementary to the science park and has the scale to become the creative hub for the area, and this development will provide opportunities with the M3 graduates… Guildford is the centre of a unique supply chain, with educators, including ACM and Surrey University, as well as being the centre of the video games, virtual effects and animation sectors that currently lacks a hub - a gap we seek to meet.” George Hamburger (Borough, Economy and Infrastructure Executive Advisory Board, 20 April 2017).

It should also be noted that a number of organisations have moved away from the Surrey Research Park, notably Microsoft (with Lionhead studios) last year. Individual members of staff also have mixed feelings about working in Guildford, with an example of what should be a 30 minute commute, taking 70:

“I commute in from Hampshire and sadly work on the research park. The traffic situation is intolerable and I am at the point where I might just change jobs simply because the current morning rush hour puts me in such a foul mood for the rest of the day.” (Email from Chris Twin to Karen Stevens, dated July 18, 2017).

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Attached documents: KJS 2017 consultation response (rev 01F).pdf (7.6 MB)

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/6700</th>
<th>Respondent: 8731649 / Ian Slater</th>
<th>Agent:</th>
</tr>
</thead>
</table>
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1 | 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:** pslp171/557  **Respondent:** 8733857 / Tony Edwards  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy E1

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

**Employment land – POLICY E1, E2**

Contrary to national trends, too much potential development land within the town centre is being allocated for retail or commercial development rather than housing. High added value businesses are welcome in the borough, but much of the employment land is designated for retail or low added value employment floorspace, which only exacerbates current issues such as lack of low cost housing and heavy traffic. Sites such as the Burnt Common Triangle, currently in the Green Belt, are inappropriate for heavy industry.

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

Attached documents:

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**Comment ID:** PSLPP16/12930  **Respondent:** 8735873 / David and Gillian Allan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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Attached documents:

Comment ID: PSLPP16/9279  Respondent: 8744417 / Mark & Gillie Hammersley  Agent:

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Comment ID: pslp171/1635  Respondent: 8746465 / Matthew Tipper  Agent:
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Comment ID: PSLPP16/17023  Respondent: 8787969 / K Britton  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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Attached documents:

Comment ID: PSLPP16/12745  Respondent:  8800545 / Bill Taylor  Agent:

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 a strategic employment site at Gosden Hill Farm (Policy A25). Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

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Attached documents:

Comment ID: PSLPP16/2359  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 E1 - Meeting employment needs

I OBJECT because:

• The evidence base is unreliable;
• There is unclear differentiation between B class uses;
• Only high value-added business uses, contributing to a modern “knowledge economy”, are desirable, not low-grade, low-employment warehousing which is also land hungry;
• Industrial and commercial businesses must be concentrated in the urban area or existing business parks (e.g. Slyfield) not in the rural environment which the infrastructure is unable to support;
• The rural environment must support micro- or high-tech businesses, agricultural industries, and tourism, and these sectors must not be damaged by general industrial development which is inappropriate.

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

Attached documents:
1. **POLICY E1**

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

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

**Attached documents:**

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**Comment ID:** PSLPP16/16538  **Respondent:** 8810849 / Charles Lee  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

**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:** PSLPP16/13222  **Respondent:** 8820353 / Gillian Beaton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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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:** PSLPP16/5569  **Respondent:** 8826081 / Simon Wilcockson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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Attached documents:

Comment ID: PSLPP16/3122  
**Respondent:** 8826177 / Charles Spence  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

Policy E1 seeks to provide an additional 3,200 jobs by 2033. I agree with the need to provide jobs, but it seems inconsistent to provide 3,200 jobs whilst seeking to construct 13,860 new homes over the same period. This implies either that the housing need is overestimated or that it is expected that the majority of workers will travel outside the Borough with a consequent increase in traffic and use of public transport. 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: PSLPP16/13375  
**Respondent:** 8826369 / Tim Madge  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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:** PSLPP16/15767  **Respondent:** 8836129 / Roger Shapley  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

We object because

- the evidence base is unreliable
- there is unclear differentiation between B class uses
- only high added-value business uses are desirable, not low grade, low employment warehousing which is land hungry
- industrial and commercial businesses must be concentrated in the urban area, or existing business parks (e.g. Slyfield) not in the rural environment which the infrastructure is unable to support
- the rural environment must support micro or high tech businesses, agricultural industries, and tourism, and these sectors must not be damaged by general industrial development which is inappropriate

We note that there is a significant reduction of between 71% and 79% in the previous job target and resultant 79% reduction in employment space in response to the many objections lodged in 2014 against an unsubstantiated agenda for economic expansion in the last draft and based on new findings by AECOM in the latest ELNA 2015

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

**Attached documents:**

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**Comment ID:** PSLPP16/7082  **Respondent:** 8837313 / Maria Baker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

**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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Comment ID: PSLPP16/16931  Respondent: 8837729 / Harry Clarke  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

1. Policy E1 – object
   1. The policy is not sustainable as there is not sufficient land available. See also comments for Policy S1
   2. The Economic Assessment for the Borough is inflated. See also comments for Policy S2.

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

Attached documents:

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Comment ID: PSLPP16/16220  Respondent: 8839041 / Jon Maslin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

I object to policy E1 sustainable employment.

I note that there is a significant reduction of between 71% and 79% in the previous job target and resultant 79% reduction in employment space in response to the many objections lodged in 2014 against an unsubstantiated agenda for economic expansion in the last draft and based on new findings by Aecom in the latest ELNA 2015.

I have concern as to the ill-informed clustering of all B classes in terms of the clarity of market evidence required to inform effective planning and a failure to provide a clear understanding of business needs required under Section 160 of the NPPF.

I also note the dramatic reduction in assessed demand by two Employment Land Needs Assessment Reports carried out under the same terms of reference within a period of 2 years which calls into question the general reliability of the process of collection and interpretation of data in the overall forward planning process by GBC. I am concerned however that the research undertaken by Aecom is generally superficial and lacks sufficient detail and analysis between B1a, B1b, B1c, B2 and B8 use classes and that no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of office, research and development, light industrial, general industrial and warehousing and distribution floor space.
No proper analysis has been made of data held by GBC in respect of different B classes in terms of planning applications granted or evidence gathered by the economic development function at GBC and no robust assessment of local market demand apart from fairly brief references to freely available market research undertaken by commercial estate agents such as Lambert Smith Hampton covering a much wider area.

GBC appears to fail to appreciate the fundamental rationale of the Use Classes Order as a planning tool in terms of useful property market research or forward planning.

What we are left with is a fairly clumsy and poorly informed plan which clusters B classes without any appreciation of widely different employment impact and economic sustainability. E.g. B1 generates at least 5 times as much employment as B8.

The lack of appreciation as to the opportunity for widely different uses being generated within B class clusters defeats the whole point of proper planning of employment uses and can significantly endanger previously good planning put forward in the previous 2003 plan. e.g. the creation of a research and development park linked to the University but now has the threat of being downgraded into a general business park (see below).

Little regard has been given in the plan to the economic reality of falling demand for B2 industrial space which is clustered with other B classes almost randomly throughout the plan.

Little regard is given to the opportunity of B1 b space as an opportunity for research and development which needs to be nurtured and preserved without the detrimental and confused clustering with other B classes both in terms of planning and promotion of a research hub.

I note that the past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 derived from VoA analysis and that the calculated annual floor space demand is 0.7% over the plan period up to 2033.

I support the concept of seeking increased investment in our local knowledge-based, high technology economy. This will provide well paid, creative jobs and generate the funding necessary to pay for the infrastructure and environment this sort of industry requires.

We need to distinguish between wanting to increase the added value of the economy and physical expansion, especially given the scarcity of land in Guildford. Guildford is not the place for large space hungry businesses. So I should target high added value small and medium sized enterprises rather than the headquarters of larger corporations.

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

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Comment ID: PSLPP16/13186  **Respondent:** 8840449 / David Wilson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

POLICY E1 to E9: Economy

11.1. **I OBJECT** to the elements of these policies which relate to a blind following of the growth mantra. This lemming like argument is part of the problem creating a “notional” need for housing, some of which would not exist if growth was seen as part of the problem rather than something to always applaud.

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

Attached documents:

Comment ID: PSLPP16/18184  **Respondent:** 8843361 / Adrian Atkinson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

**I object** to policy E1 sustainable employment  We need to distinguish between wanting to increase the added value of the economy and physical expansion, especially given the scarcity of land in Guildford. Guildford is not the place for large space hungry businesses. High added value small and medium sized enterprises should be more in keeping with
Guildford rather than the headquarters of larger corporations. We need to promote the idea of new knowledge transfer in incubator units and small premises for new start up enterprises. They need to be on the wave of innovative new technology as opposed to older established businesses, this is more in keeping of the competitive advantage of Guildford. **I object** to the policy of creating a Strategic Employment at Garlicks Arch (A43) in the Green Belt. The stated requirement of 7,000 sq m (B1c, B2 and B8) could easily be accommodated at the Slyfield Regeneration site of 40 ha.

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

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<th>Respondent: 8850433 / Ian Doherty</th>
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The proposed development of up to 7,000 sq m of either or a mix of light industrial (Blc), general industrial (B2) and storage and distribution (BS) at Garlick's Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick's Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

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

Attached documents:

---

Comment ID: PSLPP16/2516  
Respondent: 8858113 / Ramsey Nagaty  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

Guildford has low unemployment. Most job creation would appear to be retail or hopefully additional hi tech research park and other office based work. Most jobs would be relatively low paid. Such employees would struggle to purchase housing from the new proposed sites. This will lead to further commuting and gridlock.

There is way too much development expected in this plan well over what can reasonably be attained.

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

Attached documents:

---

Comment ID: PSLPP16/17778  
Respondent: 8858113 / Ramsey Nagaty  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

I OBJECT because

• the evidence base is unreliable
• there is unclear differentiation between B class uses
• only high added-value business uses are desirable, not low grade, low employment warehousing which is land hungry
• industrial and commercial businesses must be concentrated in the urban area, or existing business parks (eg Slyfield) not in the rural environment which the infrastructure is unable to support
• the rural environment must support micro or high tech businesses, agricultural industries, and tourism, and these sectors must not be damaged by general industrial development which is inappropriate

Full response
I OBJECT to this policy.

One needs to distinguish between wanting to increase the added value of the economy and physical expansion, especially given the scarcity of land in Guildford. Guildford is not the place for large space hungry businesses. We believe Guildford should target high added-value small and medium sized enterprises or the headquarters of larger corporations, but not provide low added value warehousing and industrial space.

GBC appear to fail to appreciate the fundamental rationale of the Use Classes Order as a planning tool in terms of useful property market research or forward planning.

No proper analysis has been made of data held by GBC in respect of different B classes in terms of planning applications granted or evidence gathered by the economic development function at GBC without any attempt at real market demand apart from vague references to freely available market research undertaken by commercial estate agents. (See definitions of B classes at end of this policy response).

What we are left with is a fairly clumsy and poorly informed plan which clusters B classes without any appreciation of widely different employment impact and economic sustainability. E.g. B1 (mostly local office use/R&D) generates at least 5 times as much employment as B8 (distribution and warehousing).

This draft Local Plan is partly based on new findings by Aecom in the latest ELNA 2015 [Employment Land Needs Assessment 2015]. This includes the recasting of the ELNA by Aecom in 2015 which updated the ELNA 2013 prepared by GBC. We have had regard to the evidence base provided by Aecom in the 2015 ELNA and find it a more reliable evidence base for overall projected employment in the borough over the plan period in overall numbers than done previously by GBC in 2013. However, we have concern that the survey work by Lambert Smith Hampton is in the form of high level free property research that is used for the purposes of marketing their services over a wide area not specifically commissioned for the borough of Guildford and undertaken for ELNA purposes.

However, I am concerned that the research undertaken by Aecom is generally superficial and lacks sufficient detail and analysis between B1a, B1b, B1c, B2 and B8 use classes and that no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of office, research and development, light industrial, general industrial and warehousing and distribution floor space.

The lack of appreciation by GBC as to the opportunity for widely different uses being generated within B class clusters defeats the whole point of proper planning of employment uses and can significantly endanger previously good planning put forward in the previous 2003 plan. We support the concept of seeking increased investment in our local knowledge-based, high technology economy. This will provide well paid, creative jobs and generate the wealth necessary to fund the infrastructure and environment this sort of industry requires.

We need to promote the idea of new knowledge transfer in incubator units and small premises for new start up enterprises. We need to be on the wave of innovative new technology as opposed to older established businesses. High value-added industry is desirable; low tech, land-hungry older businesses which will increase congestion are not desirable.

I have concern as to the ill-informed clustering of all B classes. This is unclear in terms of market evidence required to inform effective planning. There is a failure to provide a clear understanding of business needs within the relevant area as required under Section 160 of the NPPF.

Little regard has been given in the plan to the economic reality of falling demand for B2 industrial space which is clustered with other B classes almost randomly throughout the plan.

Little regard is had to the opportunity of B1 b space as an opportunity for research and development which needs to be nurtured and preserved without the detrimental and confused clustering with other B classes both in terms of planning and promotion of a research hub.

I do not support the policy of creating Strategic Employment sites outside the urban centres.
Some of the strategic industrial sites would be better classified as brownfield land suitable for use as a residential area, eg Woodbridge Park, Woodbridge Road and Merrow Lane.

This study varies very significantly from the previous Guildford Borough Council ELNA 2013, which after two years has been completely re-written. This leads us to question the reliability of the evidence base here which has been used to justify the assumptions and plans; it is unclear that the current evidence base is any more reliable than that used previously. This calls into question the general reliability of the process of collection and interpretation of data in the overall forward planning process by GBC.

DEFINITIONS:

B1

Business

B1 building use is use for all or any of the following purposes:

(a) as an office other than a use within class A2 (financial and professional services),

(b) for research and development of products or processes, or

(c) for any industrial process, being a use which can be carried out in any residential area without detriment to the amenity of that area by reason of noise, vibration, smell, fumes, smoke, soot, ash, dust or grit.

General Industrial

B2 building use is for the carrying on of an industrial process other than one falling within class B1 above or within classes B3 to B7 below. (Note: B3-B7 relates to very heavy industry such as oil refining, smelting etc).

Distribution or Storage

B8 building use is for storage or as a distribution centre.

I note that there is a significant reduction of between 71% and 79% in the previous job target and resultant 79% reduction in employment space in response to the many objections lodged in 2014 against an unsubstantiated agenda for economic expansion in the last draft and based on new findings by Aecom in the latest ELNA 2015.

I have concern as to the ill-informed clustering of all B classes in terms of the clarity of market evidence required to inform effective planning and a failure to provide a clear understanding of business needs required under Section 160 of the NPPF.

I also note the dramatic reduction in assessed demand by two Employment Land Needs Assessment Reports carried out under the same terms of reference within a period of 2 years which calls into question the general reliability of the process of collection and interpretation of data in the overall forward planning process by GBC. We do not support the policy of creating a Strategic Employment site at Garlick’s Arch (A43) in the Green Belt which is completely unnecessary due to the overall decrease in demand for industrial space which could be easily accommodated at Slyfield.

I am concerned however that the research undertaken by Aecom is generally superficial and lacks sufficient detail and analysis between B1a, B1b, B1c, B2 and B8 use classes and that no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of office, research and development, light industrial, general industrial and warehousing and distribution floor space.

No proper analysis has been made of data held by GBC in respect of different B classes in terms of planning applications granted or evidence gathered by the economic development function at GBC and no robust assessment of local market
demand apart from fairly brief references to freely available market research undertaken by commercial estate agents such as Lambert Smith Hampton covering a much wider area.

GBC appear to fail to appreciate the fundamental rationale of the Use Classes Order as a planning tool in terms of useful property market research or forward planning.

What we are left with is a fairly clumsy and poorly informed plan which clusters B classes without any appreciation of widely different employment impact and economic sustainability. E.g. B1 generates at least 5 times as much employment as B8.

The lack of appreciation by GBC as to the opportunity for widely different uses being generated within B class clusters defeats the whole point of proper planning of employment uses and can significantly endanger previously good planning put forward in the previous 2003 plan. E.g. the creation of a research and development park linked to the University but now has the threat of being downgraded into a general business park (see below).

Little regard has been given in the plan to the economic reality of falling demand for B2 industrial space which is clustered with other B classes almost randomly throughout the plan.

I support the concept of seeking increased investment in our local knowledge-based, high technology economy. This will provide well paid, creative jobs and generate the funding necessary to pay for the infrastructure and environment this sort of industry requires.

One needs to distinguish between wanting to increase the added value of the economy and physical expansion, especially given the scarcity of land in Guildford. Guildford is not the place for large space hungry businesses. So We should target high added value small and medium sized enterprises rather than the headquarters of larger corporations.

I object to the policy of creating a Strategic Employment at Garlicks Arch (A43) in the Green Belt. The stated requirement of 7,000 sq m (B1c, B2 and B8) could easily be accommodated at the Slyfield Regeneration site of 40 ha.

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

Attached documents:
12.2 I object to the inclusion of Send Business Centre/Tannery Studios Tannery Lane, Send in relation to proposed inset from the Green Belt because:

- The impact on small surrounding roads will create traffic gridlock
- The 2017 Employment Land Need Assessment shows a reduction in demand to a low of 3.7 and a high of 4.1 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Burnt Common in the Green Belt
- The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land as shown in the Employment Land Needs Assessment 2017
- Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate.

12.3 I object to the change in Policy E1 of proposed designation of Burnt Common as an Industrial Strategic Employment Site.

- It is adjacent to the beautiful Wey Navigation
- It is effectively an old non-conforming user in an area of outstanding countryside
- There is highly restricted vehicular access along Tannery Lane in both directions
- It was deleted from the 2014 draft because of all the local objections made previously and there is no logical reason to go back on this decision
- There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have many empty sites and industrial units
- There are patently no exceptional circumstances in terms of demand for employment space to build on this important area of Green Belt which effectively separates existing development in Send and Ripley and prevents urban sprawl
- It will join up existing villages and defeat the purpose of the Green Belt

12.4 I also object to the potential inclusion at Burnt Common of a waste management facility mentioned at the change to paragraph 4.423a which lacks sufficient detail for proper consultation and is completely inappropriate

12.5 I object to the ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 which generally is superficial and lacks sufficient detail and analysis between B1a, B1b, B1c, B2 and B8 use classes and that no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of office, research and development, light industrial, general industrial and warehousing and distribution floor space.

12.6 I object to the fact that no reliable analysis has yet been made of data held by GBC in respect of different B classes in terms of planning applications granted or evidence gathered by the economic development function at GBC and no robust assessment of local market demand apart from fairly brief references to freely available market research undertaken by commercial estate agents such as Lambert Smith Hampton covering a much wider area.

12.7 GBC in their role as a Planning Authority appear to fail to appreciate the fundamental rationale of the Use Classes Order as a planning tool in terms of procurement of useful property market research analysis or forward planning.

12.8 What we are left with is a fairly clumsy and poorly informed plan which clusters B classes without any appreciation of widely different employment impact and economic sustainability. E.g. B1 generates at least 5 times as much employment as B8.

12.9 The lack of appreciation by GBC as to the opportunity for widely different uses being generated within B class clusters defeats the whole point of proper planning of employment uses and can significantly endanger previously good planning put forward in the previous 2003 plan. E.g. the creation of a research and development park linked to the University but now has the threat of being downgraded into a general business park (see below).

12.10 Little regard has been given in the plan to the economic reality of falling demand for B2 industrial space which is clustered with other B classes almost randomly throughout the plan.

12.11 The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an
additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space."

12.12 38,357sqm of B1c, B2 or B8 use class is quite sufficient supply for the plan period and does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

12.13 Little regard is still not given to the opportunity of specific B1 b space as an opportunity for research and development which needs to be nurtured and preserved without the detrimental and confused clustering with other B classes both in terms of planning and promotion of a research hub.

12.14 I support the concept of seeking increased investment in our local knowledge-based, high technology economy. This will provide well paid, creative jobs and generate the funding necessary to pay for the infrastructure and environment this sort of industry requires. This could be on existing commercial land at Manor Farm or further afield. It does not need to be in close proximity to the University and there is no justification for expanding onto Green Belt and AONB at Blackwell Farm.

12.15 We need to distinguish between wanting to increase the added value of the economy and physical expansion, especially given the scarcity of land in Guildford. Guildford is not the place for large space hungry businesses. So i should target high added value small and medium sized enterprises rather than the headquarters of larger corporations.

12.16 We need to promote the idea of new knowledge transfer in incubator units and small premises for new start up enterprises. They need to be on the wave of innovative new technology as opposed to older established businesses.

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

Attached documents:

**Comment ID:** PSLPP16/2424  **Respondent:** 8858433 / Eric Peters  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

**Policy E1 - Meeting Employment Needs**

I object. The evidence base is not reliable. Industrial and commercial businesses must be concentrated in the urban or existing industrial areas that have infrastructure to support it rather than the rural areas.

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

**Attached documents:**

**Comment ID:** PSLPP16/2220  **Respondent:** 8860897 / Julia Shaw  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

- the evidence base is unreliable
- there is unclear differentiation between B class uses
- only high added-value business uses are desirable, not low grade, low employment warehousing which is land hungry
- industrial and commercial businesses must be concentrated in the urban area, or existing business parks (e.g. Slyfield) not in the rural environment which the infrastructure is unable to support
- the rural environment must support micro or high tech businesses, agricultural industries, and tourism, and these sectors must not be damaged by general industrial development which is inappropriate

We need to distinguish between wanting to increase the added value of the economy and physical expansion, especially given the scarcity of land in Guildford. Guildford is not the place for large space hungry businesses. I believe Guildford should target high added-value small and medium sized enterprises or the headquarters of larger corporations, but not provide low added value warehousing and industrial space.

GBC appear to fail to appreciate the fundamental rationale of the Use Classes Order as a planning tool in terms of useful property market research or forward planning.

No proper analysis has been made of data held by GBC in respect of different B classes in terms of planning applications granted or evidence gathered by the economic development function at GBC without any attempt at real market demand apart from vague references to freely available market research undertaken by commercial estate agents. (See definitions of B classes at end of this policy response).

What we are left with is a fairly clumsy and poorly informed plan which clusters B classes without any appreciation of widely different employment impact and economic sustainability. E.g. B1 (mostly local office use/R&D) generates at least 5 times as much employment as B8 (distribution and warehousing).

This draft Local Plan is partly based on new findings by Aecom in the latest ELNA 2015 [Employment Land Needs Assessment 2015]. This includes the recasting of the ELNA by Aecom in 2015 which updated the ELNA 2013 prepared by GBC. People I know have had regard to the evidence base provided by Aecom in the 2015 ELNA and find it a more reliable evidence base for overall projected employment in the borough over the plan period in overall numbers than done previously by GBC in 2013. However, I have concern that the survey work by Lambert Smith Hampton is in the form of high level free property research that is used for the purposes of marketing their services over a wide area not specifically commissioned for the borough of Guildford and undertaken for ELNA purposes.

However, I am concerned that the research undertaken by Aecom is generally superficial and lacks sufficient detail and analysis between B1a, B1b, B1c, B2 and B8 use classes and that no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of office, research and development, light industrial, general industrial and warehousing and distribution floor space.

The lack of appreciation by GBC as to the opportunity for widely different uses being generated within B class clusters defeats the whole point of proper planning of employment uses and can significantly endanger previously good planning put forward in the previous 2003 plan. I support the concept of seeking increased investment in our local knowledge-based, high technology economy. This will provide well paid, creative jobs and generate the wealth necessary to fund the infrastructure and environment this sort of industry requires.

We need to promote the idea of new knowledge transfer in incubator units and small premises for new start up enterprises. We need to be on the wave of innovative new technology as opposed to older established businesses. High value-added industry is desirable; low tech, land-hungry older businesses which will increase congestion are not desirable.

I have concern as to the ill-informed clustering of all B classes. This is unclear in terms of market evidence required to inform effective planning. There is a failure to provide a clear understanding of business needs within the relevant area as required under Section 160 of the NPPF.
Little regard has been given in the plan to the economic reality of falling demand for B2 industrial space which is clustered with other B classes almost randomly throughout the plan.

Little regard is had to the opportunity of B1 b space as an opportunity for research and development which needs to be nurtured and preserved without the detrimental and confused clustering with other B classes both in terms of planning and promotion of a research hub.

I do not support the policy of creating Strategic Employment sites outside the urban centres.

Some of the strategic industrial sites would be better classified as brownfield land suitable for use as a residential area, eg Woodbridge Park, Woodbridge Road and Merrow Lane.

This study varies very significantly from the previous Guildford Borough Council ELNA 2013, which after two years has been completely re-written. This leads me to question the reliability of the evidence base here which has been used to justify the assumptions and plans; it is unclear that the current evidence base is any more reliable than that used previously. This calls into question the general reliability of the process of collection and interpretation of data in the overall forward planning process by GBC.

**DEFINITIONS:**

**B1 Business**

B1 building use is use for all or any of the following purposes:

(a) as an office other than a use within class A2 (financial and professional services),

(b) for research and development of products or processes, or

(c) for any industrial process, being a use which can be carried out in any residential area without detriment to the amenity of that area by reason of noise, vibration, smell, fumes, smoke, soot, ash, dust or grit.

**General Industrial**

B2 building use is for the carrying on of an industrial process other than one falling within class B1 above or within classes B3 to B7 below. (Note: B3-B7 relates to very heavy industry such as oil refining, smelting etc).

**Distribution or Storage**

B8 building use is for storage or as a distribution centre.

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

**Attached documents:**
• 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.

1. I object to the change in Policy E1 of proposed designation of Burnt Common as an Industrial Strategic Employment Site.

• It was deleted from the 2014 draft because of all the local objections made previously and there is no logical reason to go back on this decision
• The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land as shown in the Employment Land Needs Assessment 2017
• There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have many empty sites and industrial units
• The 2017 Employment Land Need Assessment shows a reduction in demand to a low of 3.7 and a high of 4.1 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Burnt Common in the Green Belt
• There are patently no exceptional circumstances in terms of demand for employment space to build on this important area of Green Belt which effectively separates existing development in Send and Ripley and prevents urban sprawl
• The impact on small surrounding roads will create traffic gridlock
• It will join up existing villages and defeat the purpose of the Green Belt

1. I also object to the potential inclusion at Burnt Common of a waste management facility mentioned at the change to paragraph 4.423a which lacks sufficient detail for proper consultation and is completely inappropriate

2. I object to the ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 which generally is superficial and lacks sufficient detail and analysis between B1a, B1b, B1c, B2 and B8 use classes and that no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of office, research and development, light industrial, general industrial and warehousing and distribution floor space.

3. I object to the fact that no reliable analysis has yet been made of data held by GBC in respect of different B classes in terms of planning applications granted or evidence gathered by the economic development function at GBC and no robust assessment of local market demand apart from fairly brief references to freely available market research undertaken by commercial estate agents such as Lambert Smith Hampton covering a much wider area.

4. GBC in their role as a Planning Authority appear to fail to appreciate the fundamental rationale of the Use Classes Order as a planning tool in terms of procurement of useful property market research analysis or forward planning.

5. What we are left with is a fairly clumsy and poorly informed plan which clusters B classes without any appreciation of widely different employment impact and economic sustainability. E.g. B1 generates at least 5 times as much employment as B8.

6. The lack of appreciation by GBC as to the opportunity for widely different uses being generated within B class clusters defeats the whole point of proper planning of employment uses and can significantly endanger previously good planning put forward in the previous 2003 plan. E.g. the creation of a research and development park linked to the University but now has the threat of being downgraded into a general business park (see below).

7. Little regard has been given in the plan to the economic reality of falling demand for B2 industrial space which is clustered with other B classes almost randomly throughout the plan.

8. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

9. 38,357sqm of B1c, B2 or B8 use class is quite sufficient supply for the plan period and does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old
existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. Little regard is still not given to the opportunity of specific B1 space as an opportunity for research and development which needs to be nurtured and preserved without the detrimental and confused clustering with other B classes both in terms of planning and promotion of a research hub.

11. I support the concept of seeking increased investment in our local knowledge-based, high technology economy. This will provide well paid, creative jobs and generate the funding necessary to pay for the infrastructure and environment this sort of industry requires.

12. We need to distinguish between wanting to increase the added value of the economy and physical expansion, especially given the scarcity of land in Guildford. Guildford is not the place for large space hungry businesses. So I should target high added value small and medium sized enterprises rather than the headquarters of larger corporations.

13. We need to promote the idea of new knowledge transfer in incubator units and small premises for new start up enterprises. They need to be on the wave of innovative new technology as opposed to older established businesses.

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

Attached documents:

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<th>Comment ID: PSLPP16/2846</th>
<th>Respondent: 8865377 / Angus McIntosh</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1</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>There is very little about the future of the Science Park and employment generally; this is a jewel in the borough, which is almost ignored. Where is the evident of future employment change and the extra traffic generated?</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 object to the sustainable employment policy (Policy E1)</td>
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<tr>
<td>I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.</td>
<td></td>
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<tr>
<td>I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated</td>
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on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

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

Attended documents:

Comment ID: PSLPP16/14844  Respondent: 8865985 / Grant Ringshaw  Agent:

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

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

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

Attached documents:

Comment ID: PSLPP16/1349  Respondent: 8875233 / Richard Hiam  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 sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

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**Attached documents:**

<table>
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<tr>
<th>Comment ID: PSLPP16/7631</th>
<th>Respondent: 8875457 / Mark Ground</th>
<th>Agent:</th>
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<th>Comment ID: PSLPP16/7156</th>
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Attached documents:
There is limited employment in the area which will mean that people will commute to other areas to work necessitating car journeys which exacerbate congestion and can hardly be described as sustainable. Local employment and infrastructure considerations should be a key factor in development decisions of this scale and this has clearly not been addressed in the local plan.

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<th>Comment ID: PSLPP16/2932</th>
<th>Respondent: 8888449 / Phillip Marazzi</th>
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<td>Where are these people going to work? There is very limited local employment, so they will largely consist of commuters with all the problems associated with this.</td>
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1.1 We object to policy E1 sustainable employment

1.2 We note that there is a significant reduction of between 71% and 79% in the previous job target and resultant 79% reduction in employment space in response to the many objections lodged in 2014 against an unsubstantiated agenda for economic expansion in the last draft and based on new findings by Aecom in the latest ELNA 2015.

1.3 We have concern as to the ill-informed clustering of all B classes in terms of the clarity of market evidence required to inform effective planning and a failure to provide a clear understanding of business needs required under Section 160 of the NPPF.

1.4 We also note the dramatic reduction in assessed demand by two Employment Land Needs Assessment Reports carried out under the same terms of reference within a period of 2 years which calls into question the general reliability of the process of collection and interpretation of data in the overall forward planning process by GBC. I do not support the policy of creating a Strategic Employment site at Garlick’s Arch (A43) in the Green Belt which is completely unnecessary due to the overall decrease in demand for industrial space which could be easily accommodated at Slyfield.

1.5 We are concerned however that the research undertaken by Aecom is generally superficial and lacks sufficient detail and analysis between B1a, B1b, B1c, B2 and B8 use classes and that no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of office, research and development, light industrial, general industrial and warehousing and distribution floor space.

1.6 No proper analysis has been made of data held by GBC in respect of different B classes in terms of planning applications granted or evidence gathered by the economic development function at GBC and no robust assessment of
local market demand apart from fairly brief references to freely available market research undertaken by commercial
estate agents such as Lambert Smith Hampton covering a much wider area.

1.7 GBC appear to fail to appreciate the fundamental rationale of the Use Classes Order as a planning tool in terms
of useful property market research or forward planning.

1.8 What we are left with is a fairly clumsy and poorly informed plan which clusters B classes without any
appreciation of widely different employment impact and economic sustainability. E.g. B1 generates at least 5 times as
much employment as B8.

1.9 The lack of appreciation by GBC as to the opportunity for widely different uses being generated within B class
clusters defeats the whole point of proper planning of employment uses and can significantly endanger previously good
planning put forward in the previous 2003 plan. E.g. the creation of a research and development park linked to the
University but now has the threat of being downgraded into a general business park (see below).

1.10 Little regard has been given in the plan to the economic reality of falling demand for B2 industrial space which is
clustered with other B classes almost randomly throughout the plan.

1.11 Little regard is had to the opportunity of B1 b space as an opportunity for research and development which needs
to be nurtured and preserved without the detrimental and confused clustering with other B classes both in terms of
planning and promotion of a research hub.

1.12 We note that the past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 derived
from VoA analysis and that the calculated annual floor space demand is 0.7% over the plan period up to 2033.

1.13 We support the concept of seeking increased investment in our local knowledge-based, high technology
economy. This will provide well paid, creative jobs and generate the funding necessary to pay for the infrastructure and
environment this sort of industry requires.

1.14 We need to distinguish between wanting to increase the added value of the economy and physical expansion,
especially given the scarcity of land in Guildford. Guildford is not the place for large space hungry businesses. So i
should target high added value small and medium sized enterprises rather than the headquarters of larger corporations.

1.15 We need to promote the idea of new knowledge transfer in incubator units and small premises for new start up
enterprises. They need to be on the wave of innovative new technology as opposed to older established businesses.

1.16 **We object** to the policy of creating a Strategic Employment at Garlicks Arch (A43) in the Green Belt. The stated
requirement of 7,000 sq m (B1c, B2 and B8) could easily be accommodated at the Slyfield Regeneration site of 40 ha.

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

Attached documents:

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**Comment ID:** pslp171/1782  **Respondent:** 8893057 / Dianne Garnett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy E1

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

National trends show that too much retail and commercial space in the town centre has been allocated for commercial
retail rather than housing. Large floorspaces of this nature will end up as white elephants and the green belt will be built
over. It also exacerbates the issue of gridlocked traffic when workers commute. I object to this.

**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?
I object to E1 because High value added businesses are what is required, not low value ones.

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

Attached documents:

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Comment ID: PSLPP16/8033  Respondent: 8899713 / Tessa Crago  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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Comment ID: PSLPP16/4250  Respondent: 8900705 / Susan Fuller  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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I OBJECT TO POLICY E1 (EMPLOYMENT):

- Poor evidence base.
- Too much encouragement to low added-value employment that’s needed elsewhere in the country.
- Fails to concentrate general business activity in urban areas or business parks that have the infrastructure.
- Fails to differentiate this from appropriate rural business.
- Too much encouragement of warehousing, for which Guildford is too congested.

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

Attached documents:

Comment ID: PSLPP16/16948  Respondent: 8902689 / Lyndell Mussell  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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BUSINESS DEVELOPMENT

Business development must be limited. Land is a finite resource and plans to build further business projects in a congested area must increase costs of production. Of course better utilisation of existing 'brown field sites' is always welcome.

In addition, concentration of high value (i.e. Hi-tech) industries, which require less space resources should be encouraged.

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

Attached documents:

Comment ID: PSLPP16/18522  Respondent: 8903265 / Susan Anderson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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Comment ID: PSLPP16/15022  Respondent: 8904129 / Elizabeth Ross  Agent:

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Comment ID: PSLPP16/4185  Respondent: 8904673 / Colin Burnside  Agent:
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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?
Henley Business Park - Listed as Strategic Employment Site

There is no evidence that the businesses based at Henley offer local jobs and therefore numbers of vehicles in the car parks are testament that no-one walks to this site. I would even hazard a guess that NOT ONE person working at any company based there walks to work. Access to this site is only realistically by road as the distance from any main housing is too great and the pavement access is very poor down a very fast and dark road. Therefore even adding the new housing in Policy 46 will NOT make this a sustainable. So the evidence to make Henley Business Park a Sustainable Employment for the local community is not proven.

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

1. POLICY E1

I OBJECT to the sustainable employment policy (Policy E1)

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Comment ID: PSLPP16/13007  Respondent: 8921569 / Steven Cliff  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

I object to the sustainable employment policy (Policy E1)

I understand that the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site if it was developed. However, in the wider industrial development context the 7,000 sq m of development proposed for a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is small. I note the surplus land available in the existing industrial development just to the south of the site at Burnt Common – easily sufficient to take 7,000 sq m of further development of this type. Given suitable alternative brownfield site very close by, the Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site.

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

Attached documents:

Comment ID: PSLPP16/13202  Respondent: 8921857 / Claire Kukielka  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

1. POLICY E1

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<thead>
<tr>
<th>Comment ID: PSLPP16/5783</th>
<th><strong>Respondent:</strong> 8924577 / Charles Lee</th>
<th><strong>Agent:</strong></th>
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<td><strong>Document:</strong></td>
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<tr>
<th>Comment ID: PSLPP16/10989</th>
<th><strong>Respondent:</strong> 8926401 / Christine Medlow</th>
<th><strong>Agent:</strong></th>
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<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy E1</td>
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</tbody>
</table>

**E1 Sustainable Employment** (P 63).

While the town centre can be a suitable location for Offices (use B1a) – assuming that journeys to it are not made by car - it is not so for Research and Development (B1b). R and D normally requires spacious sites and usually some industrial equipment and has low employee density. I ask that class B1b be removed from this policy objective.

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

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15142</th>
<th><strong>Respondent:</strong> 8926529 / Annie Cross</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 E1</td>
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</table>
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Policy E1 - Meeting Employment Needs

Permitted development allows commercial properties to be converted to residential use, but at a loss of employment opportunities. I object to development of brownfield sites without some commercial activity being included, proportionate to the size of development.

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

Attached documents:

Comment ID: PSLPP16/11705  Respondent: 8928033 / P. Richardson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

Attached documents:

Comment ID: PSLPP16/11929  Respondent: 8928289 / Trevor Skerritt  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

POLICY E1: Sustainable employment

We support the general policy statements made in this policy, whilst having no opinion on the scale of the new office space and industrial land area being proposed by GBC.

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

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<tr>
<th>Comment ID: PSLPP16/8761</th>
<th>Respondent: 8933185 / Peter See</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1</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>Page 64 Policy E1: Sustainable Employment and include: including</td>
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<tr>
<td>Page 71 Policy E1: Meeting Employment Needs</td>
<td>4.4.9 choice and flexibility is not: choice and flexibility are not We recommend to the Inspector that Policy E1 is changed in the following way: &quot;choice and flexibility is not&quot; is amended to &quot;choice and flexibility are not&quot; Review for duly made</td>
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<th>Comment ID: pslp171/815</th>
<th>Respondent: 8933537 / Annie Ladd</th>
<th>Agent:</th>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
FLAG would like to see more differentiation between the different classes of Industrial Land. We want to encourage hi-tech businesses, but feel that warehouses are not an efficient use of expensive land.

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

**Attached documents:**

---

**Comment ID:** PSLPP16/17590  
**Respondent:** 8944737 / Martin Grant Homes (Martin Grant Homes)  
**Agent:** Barton Willmore (Michael Knott)

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

7.1 In relation to office (B1a) and Research & Development (B1b) Strategic Employment Sites, Policy E1 states that:

“**When developed, the new employment site at Gosden Hill Farm will be treated as a Strategic Employment Site.”**

7.2 As explained in more detail below and detailed within the VDFD submitted with these representations, MGH’s current proposals for Gosden Hill envisage the delivery of a prime B1 office site alongside the new A3 access and Park and Ride, together with other employment provision being delivered as part of a mixed use area located at the southern end of the site, adjacent to the proposed Merrow Station.

7.3 It therefore needs to be made clear in Policy E1 that this relates only to employment land which is envisaged to be delivered alongside the A3 development access at Gosden Hill for B1a Office development.

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

**Attached documents:**

---

**Comment ID:** pslp171/2727  
**Respondent:** 8944929 / A Jefferies  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy E1

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

14. I object to para 10 of policy E1. Where is the “new industrial employment land on the west side of the former Wisley airfield”? there is no “new” employed land listed under policy A35. This is confusing and needs to be clarified.

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

**Attached documents:**

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**Comment ID:** pslp171/1303  
**Respondent:** 8947457 / Gerry Armstrong  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy E1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**
I object to Policy E1 and E2 because it is nationally recognised there is a down turn in retail within town centres. Employment in this sector is in decline due to the rapid rise of internet shopping. It would be better used for mixed housing.

This week I received a leaflet from local supplier Afinity Water, highlighting that ‘After months of low rainfall, water resources are below average’..... ‘after months of low winter rainfall, our groundwater resources remain well below average – despite the rain in May and June’. Here is a good example illustrating that our natural resources have limits and could fail under such large scale excessive demands from new development.

No one seems to be looking at the ‘big picture’ realistically or considering the overall impact that these large developments, in close proximity to each other, will have on the area! It is downright irresponsible that this has not been factored into council plans and the overall housing numbers substantially reduced.

In conclusion I object to the unsustainable, unrealistic levels of homes the Government are pushing on Councils in the South East of England. Our roads are already running above capacity. This whole area is in serious danger of grinding to a complete standstill. The addition of 60,000 cars from new development joining the network (large scale developments in neighbouring Aldershot, Waverly, Woking and Rushmoor) would simply be too much for the area and would destroy our environment.

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

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16159</th>
<th>Respondent: 8948385 / Gillian Eve</th>
<th>Agent:</th>
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<tr>
<td>No comment. This should not be taken to imply support for this policy.</td>
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<tr>
<th>Comment ID: PSLPP16/17301</th>
<th>Respondent: 8967233 / University of Surrey (University of Surrey)</th>
<th>Agent: Terence O'Rourke (Luke Vallins)</th>
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<tr>
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<tr>
<td>The University supports the allocation of between 37,000 and 47,000 sq m of floorspace for B1a and B1b uses and between 4.7 and 5.3 ha land for B1c, B2 and B8 use class floor space to ensure an adequate supply of land is available for employment purposes.</td>
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<tr>
<td>In addition, the University supports the Plan’s view that “The retention of existing and creation of new incubator and move-on units is key to supporting new businesses in the borough and helping existing small businesses to thrive” and also the stated view that “A priority in our economic strategy is to increase the amount of incubator and start-up space for new and emerging SME’s.”</td>
<td></td>
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</tr>
<tr>
<td>The University of Surrey and Surrey Research Park are important contributors to business innovation and start up and the Blackwell Farm allocation will enable the Surrey Research Park to expand and secure further success.</td>
<td></td>
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<tr>
<td>The University supports recognition of the University of Surrey and Surrey Research Park as significant contributors to the local economy, as outlined in paragraph 4.4.4 as follows:</td>
<td></td>
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<tr>
<td>“Guildford’s economy is strong in areas that the government has announced are high priority growth areas for the UK including health and life sciences, space, digital and creative industries, and professional services. We are seeing the emergence and clustering of innovative industries, some based at the Surrey Research Park and the University of Surrey and others in the town centre, such as electronic gaming, stem cell research and satellite technology. We have also benefited from strong cluster growth in high tech innovative businesses including healthcare and bioscience and satellite technology. There are some emerging clusters built around 5G technologies and veterinary science (including the significant recent investment and presence of the Pirbright Institute, world leaders in animal virology) which have considerable potential for inward investment and business start ups.”</td>
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<td>The University supports the protection of the Surrey Research Park (extended) as a Strategic Employment Site.</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: pslp171/3257</th>
<th>Respondent: 8973377 / Cassidy Slyfield Ltd. (Cassidy Slyfield Ltd)</th>
<th>Agent: Nathaniel Lichfield &amp; Partners (Steven Butterworth)</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Land North of Slyfield Industrial Estate (Formerly Site 63): Representation on behalf of Cassidy Slyfield Ltd and Mr & Mrs Mostyn

The amendments to Policy E1 and its reasoned justification, and the underpinning updated evidence base, do not alter our assessment such that the Local Plan remains unsound for the reasons cited in our July 16 representation.

Specifically, we note that following the publication for the revised ELNA (March 2017), the allocation of industrial land (B1c, B2 and B8) has reduced further from a range of 4.7-5.1ha to 3.7-4.1ha. Policy E1 is unsound because the policy has not been positively prepared, adequately justified, is not effective in meeting the needs and therefore remains inconsistent with the NPPF, as it does not allocate sufficient land to provide a range and choice of employment premises over the plan period to accommodate growth required for the borough’s economy to develop and strengthen.

Plan Modifications Sought

In order to make Policy E1 and the Site Allocations sound in this respect:
1 The ENLA and Policy E1 should revisit the actual employment floorspace needed (which we have not revisited again);
2 Policy E1 and the Site Allocations should identify the North Slyfield Site for employment use development (if necessary prioritised ahead of land at Garlick’s Arch, Send Marsh and at Burnt Common, given it is a better planning option), such that:
   - Policy E1 is amended to read: "(8) When developed, the new employment site at North Slyfield, will be treated as an Industrial Strategic Employment Site";
   - An additional Site Allocation is identified within the Guildford Urban Area as set out below:

[Table]

Allocation Reasons Summary

The 4ha North Slyfield Site should be removed from the Green Belt and be allocated in the Guildford Local Plan for employment development within Classes B1c, B2 and B8, for the following summary reasons:

Employment
1 There is a quantitative need to allocate additional employment land in the Borough.
2 There is a qualitative need to provide additional employment land adjacent to SIE, Guildford’s premier industrial / warehousing location.
3 The North Slyfield Site would be more easily delivered than the other employment allocations.
4 The allocation of the North Slyfield Site would positively support other Council strategies.

Green Belt
5 Development of the North Slyfield Site would not harm the Green Belt or landscape.

Site Characteristics
6 The North Slyfield Site is preferable compared to the employment allocations in the Proposed Submission Local Plan.

Local Plan Consultation Responses
7 The allocation of the North Slyfield Site for employment purposes did not arouse a significant degree of opposition from the general public or other stakeholders.

Concluding Remarks
The 4ha North Slyfield Site should be removed from the Green Belt and be allocated in the Guildford Local Plan for employment development within Classes B1c, B2 and B8, to make the Policy E1 and the employment Site Allocations within the PSLP sound.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Policy E1 is amended to read: "(8) When developed, the new employment site at North Slyfield, will be treated as an Industrial Strategic Employment Site"; and

- An additional Site Allocation is identified within the Guildford Urban Area as set out below:

[Table]

Attached documents: 13719 Proposed Submission Local Plan (Reg 19) Consultation Rep 18.07.16.pdf (8.2 MB)
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY E1 Meeting employment needs

OBJECT because

• the evidence base is unreliable
• there is unclear differentiation between B class uses
• only high added-value business uses are desirable, not low grade, low employment warehousing which is land hungry
• industrial and commercial businesses must be concentrated in the urban area, or existing business parks (eg Slyfield) not in the rural environment which the infrastructure is unable to support
• the rural environment must support micro or high tech businesses, agricultural industries, and tourism, and these sectors must not be damaged by general industrial development which is inappropriate

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

I object to the change in Policy E1 sustainable employment because they have not addressed many of the 32,000 objections made to the 2016 plan.

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.

I object to the change in Policy E1 of proposed designation of Burnt Common as an Industrial Strategic Employment Site.

• It was deleted from the 2014 draft because of all the local objections made previously and there is no logical reason to go back on this decision
• The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land as shown in the Employment Land Needs Assessment 2017
• There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have many empty sites and industrial units
• The 2017 Employment Land Need Assessment shows a reduction in demand to a low of 3.7 and a high of 4.1 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Burnt Common in the Green
There are patently no exceptional circumstances in terms of demand for employment space to build on this important area of Green Belt which effectively separates existing development in Send and Ripley and prevents urban sprawl.

- The impact on small surrounding roads will create traffic gridlock
- It will join up existing villages and defeat the purpose of the Green Belt

I also object to the potential inclusion at Burnt Common of a waste management facility mentioned at the change to paragraph 4.423a which lacks sufficient detail for proper consultation and is completely inappropriate.

I object to the ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 which generally is superficial and lacks sufficient detail and analysis between B1a, B1b, B1c, B2 and B8 use classes and that no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of office, research and development, light industrial, general industrial and warehousing and distribution floor space.

I object to the fact that no reliable analysis has yet been made of data held by GBC in respect of different B classes in terms of planning applications granted or evidence gathered by the economic development function at GBC and no robust assessment of local market demand apart from fairly brief references to freely available market research undertaken by commercial estate agents such as Lambert Smith Hampton covering a much wider area.

GBC in their role as a Planning Authority appear to fail to appreciate the fundamental rationale of the Use Classes Order as a planning tool in terms of procurement of useful property market research analysis or forward planning.

What we are left with is a fairly clumsy and poorly informed plan which clusters B classes without any appreciation of widely different employment impact and economic sustainability. E.g. B1 generates at least 5 times as much employment as B8.

The lack of appreciation by GBC as to the opportunity for widely different uses being generated within B class clusters defeats the whole point of proper planning of employment uses and can significantly endanger previously good planning put forward in the previous 2003 plan. E.g. the creation of a research and development park linked to the University but now has the threat of being downgraded into a general business park (see below).

Little regard has been given in the plan to the economic reality of falling demand for B2 industrial space which is clustered with other B classes almost randomly throughout the plan.

The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

38,357sqm of B1c, B2 or B8 use class is quite sufficient supply for the plan period and does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

Little regard is still not given to the opportunity of specific B1 h space as an opportunity for research and development which needs to be nurtured and preserved without the detrimental and confused clustering with other B classes both in terms of planning and promotion of a research hub.

I support the concept of seeking increased investment in our local knowledge-based, high technology economy. This will provide well paid, creative jobs and generate the funding necessary to pay for the infrastructure and environment this sort of industry requires.
We need to distinguish between wanting to increase the added value of the economy and physical expansion, especially given the scarcity of land in Guildford. Guildford is not the place for large space hungry businesses. So I should target high added value small and medium sized enterprises rather than the headquarters of larger corporations.

We need to promote the idea of new knowledge transfer in incubator units and small premises for new start up enterprises. They need to be on the wave of innovative new technology as opposed to older established businesses.

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

Attached documents:

Comment ID: PSLPP16/7004  Respondent: 9094753 / D Jones  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

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

Attached documents:

Comment ID: PSLPP16/4478  Respondent: 9298465 / Peter Grover  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1
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: PSLPP16/14949  Respondent: 9327009 / sp2 Consulting Limited (Stephen Parker)  Agent:

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

I OBJECT because
• the evidence base is unreliable
• there is unclear differentiation between B class uses
• only high added-value business uses are desirable, not low grade, low employment warehousing which is land hungry
• industrial and commercial businesses must be concentrated in the urban area, or existing business parks (e.g. Slyfield) not in the rural environment which the infrastructure is unable to support
• the rural environment must support micro or high tech businesses, agricultural industries, and tourism, and these sectors must not be damaged by general industrial development which is inappropriate

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

Attached documents:

Comment ID: PSLPP16/10639  Respondent: 9335041 / David Reeve  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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?

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Policy E1: Sustainable Employment

**I OBJECT** to this policy on the basis that it has been developed on the same data on economic growth that has been called into question in respect of the SHMA. It needs to be thoroughly reviewed before this policy is considered seriously.

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

**Attached documents:**

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5. **I OBJECT** to the sustainable employment policy

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000sqm. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

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I **OBJECT** to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

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The site is in any event subject to frequent flooding and unsuitable for development.

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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: PSLPP16/10273  Respondent: 10305921 / Enterprise M3 Local Enterprise Partnersh (Kathy Slack)
Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

Employment

In 2016 Enterprise M3 LEP commissioned Regeneris to undertake a review of their 2013 Commercial Property Market
Study. The final report is due to be considered at Enterprise M3’s Board Meeting in July 2016. Information relating to
this is not yet in the public domain but for the purposes of this consultation has been referenced to help support our
response. In light of this, Enterprise M3 requests that this response is only made public once the Commercial Property Market
Study has been published.

The Enterprise M3 Commercial Property Market Study, 2016 highlights that Guildford is a highly sought after office
location. Its highly skilled labour, market and transport connections to London mean that office development attracts
some of the highest rental values in the LEP area and that speculative office development is therefore commercially
viable. Future developments, such as the planned expansion of the University of Surrey will further enhance the appeal of
Guildford as a location for inward investment.

The Commercial Property Market Study, 2016 highlights that the challenge facing Guildford is that it has a major
shortage of office space within the town centre and a very limited pipeline of sites. The few vacant sites in the town
centre are also under growing pressure to be converted to residential uses. It therefore follows that Enterprise M3 is
therefore very supportive of employment allocations for quality, grade A office space within Guildford town centre which
meets this demand. Although within the Proposed Submission Local Plan we have noted that there are a limited number
of allocations for employment development within the town centre, Enterprise M3 is supportive of the Draft Guildford
Town Centre Masterplan, 2015 and look forward to seeing the proposals and working with Guildford Borough Council to
bring it forward. In particular, the ability of the Bedford Wharf area to provide much needed employment space within
the town centre would be very much welcomed.

Nevertheless, given the recognised shortage of office space within the town centre we encourage further consideration to
be given to ensuring that there is sufficient land allocated for quality office development within the town centre in order to prevent the loss of existing and new major users in the future finding no suitable land in Guildford and subsequently locating elsewhere to the economic detriment of the wider Enterprise M3 area.

The Commercial Property Market Study, 2016 also highlights that demand for industrial sites in Guildford has been strong, evidenced by the take up and development at Henley Business Park. Since 2013 the business park has achieved one pre-let and is also speculatively building out two units, with only 6,000 sq m of development space remaining.

However, the Commercial Property Market Study, 2016 recognises that there remains a persistent shortage of both available industrial space and land with development potential in most market areas within the LEP. This includes light industrial space which is suitable for SMEs, but particularly for large scale warehousing which could attract new investment to the LEP area in light of recent upwards trends in e-commerce. This undersupply of B8 space transcends LEP boundaries, with very strong demand evident for any sites that can serve the London market. We would therefore encourage further consideration to be given in planning for storage & distribution employment space to meet the needs of the warehousing/logistics sector in the South East, a region which has been recognised as experiencing a particular shortage.

Policy E1 makes reference to the need to plan for between 4.7ha and 5.3ha of industrial land (B1c, B2, and B8 uses) within Guildford during the plan period 2013 - 2033. From looking through the Site Allocations section of the Proposed Submission Local Plan, the majority of this requirement for industrial land can be met through the development of the Slyfield Regeneration Area (Allocation A24), a 40 ha site allocated for light industrial uses as well as 1,000 homes, 4 traveller pitches, a new waste management depot and sewage treatment works and community facilities. A further 7,000 sq m of land for industrial and storage & distribution uses can also be accommodated at Garlick’s Arch, Send Marsh/ Burnt Common and Ripley (Allocation A43) and as aforementioned, 6,000 sq m of development space for storage & distribution uses also remains at Henley Business Park. This indicates that there is enough supply to meet the requirements for industrial development as set out in Guildford’s Employment Lands Needs Assessment, 2015 and we are supportive of this approach.

On balance, Enterprise M3 LEP is supportive of Guildford’s Proposed Submission Local Plan and welcomes the strategy put forward to allow Guildford to continue to play a pivotal role in the economic prosperity of the M3 Corridor as one of the LEPs key Growth Towns. As mentioned above we would encourage the Council to give further consideration on how additional employment sites to meet the demand for office space within the town centre can be incorporated to support the continued growth and prosperity of the town centre going forward. We are very supportive of the increased housing target and would very much welcome the opportunity to work with you to ensure its delivery and to continue to work with you in the positive way which we have done to date.

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

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response. In light of this, Enterprise M3 requests that this response is only made public once the Commercial Property Market Study has been published.

The Enterprise M3 Commercial Property Market Study, 2016 highlights that Guildford is a highly sought after office location. Its highly skilled labour, market and transport connections to London mean that office development attracts some of the highest rental values in the LEP area and that speculative office development is therefore commercially viable. Future developments, such as the planned expansion of the University of Surrey will further enhance the appeal of Guildford as a location for inward investment.

The Commercial Property Market Study, 2016 highlights that the challenge facing Guildford is that it has a major shortage of office space within the town centre and a very limited pipeline of sites. The few vacant sites in the town centre are also under growing pressure to be converted to residential uses. It therefore follows that Enterprise M3 is therefore very supportive of employment allocations for quality, grade A office space within Guildford town centre which meets this demand.

Although within the Proposed Submission Local Plan we have noted that there are a limited number of allocations for employment development within the town centre, Enterprise M3 is supportive of the Draft Guildford Town Centre Masterplan, 2015 and look forward to seeing the proposals and working with Guildford Borough Council to bring it forward. In particular, the ability of the Bedford Wharf area to provide much needed employment space within the town centre would be very much welcomed.

Nevertheless, given the recognised shortage of office space within the town centre we encourage further consideration to be given to ensuring that there is sufficient land allocated for quality office development within the town centre in order to prevent the loss of existing and new major users in the future finding no suitable land in Guildford and subsequently locating elsewhere to the economic detriment of the wider Enterprise M3 area.

Enterprise M3 is very supportive of policy E4, which makes provision for a 10 ha extension to Surrey Research Park. This is one of the Borough’s largest employment areas and a centre of excellence in technology, science health and engineering. This extension is expected to provide up to 35,000 sq m of additional office and R&D floor space, which added to the remaining 9,000 sq m provides a significant amount of employment space for research, development and design activities that are complimentary to those activities undertaken at the University of Surrey. This extension will ensure the continued growth and success of the Research Park and the businesses within it, which aligns strongly within our ambitions for innovation and enterprise across the Enterprise M3 LEP area, particularly around the development of 5G technology for which the University of Surrey is playing a key part.

The Commercial Property Market Study, 2016 also highlights that demand for industrial sites in Guildford has been strong, evidenced by the take up and development at Henley Business Park. Since 2013 the business park has achieved one pre-let and is also speculatively building out two units, with only 6,000 sq m of development space remaining.

However, the Commercial Property Market Study, 2016 recognises that there remains a persistent shortage of both available industrial space and land with development potential in most market areas within the LEP. This includes light industrial space which is suitable for SMEs, but particularly for large scale warehousing which could attract new investment to the LEP area in light of recent upwards trends in e-commerce. This undersupply of B8 space transcends LEP boundaries, with very strong demand evident for any sites that can serve the London market. We would therefore encourage further consideration to be given in planning for storage & distribution employment space to meet the needs of the warehousing/logistics sector in the South East, a region which has been recognised as experiencing a particular shortage.

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requirements for industrial development as set out in Guildford’s Employment Lands Needs Assessment, 2015 and we are supportive of this approach.

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

Attached documents:

Comment ID: PSLPP16/12666  Respondent: 10619169 / Wendy Critchlow  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

I OBJECT to the sustainable employment policy (Policy E1)

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The site is in any event subject to frequent flooding and unsuitable for development.

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

Attached documents:

Comment ID: PSLPP16/8222  Respondent: 10662849 / Garry Walton  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

POLICY E1 - Meeting employment needs

I OBJECT because -
the evidence base is unreliable;
there is unclear differentiation between B class uses;
only high value-added business uses, contributing to a modern “knowledge economy”, are desirable, not low-grade, low-
employment warehousing which is also land hungry;
industrial and commercial businesses must be concentrated in the urban area or existing business parks (e.g. Slyfield) not
in the rural environment which the infrastructure is unable to support;
the rural environment must support micro- or high-tech businesses, agricultural industries, and tourism, and these sectors
must not be damaged by general industrial development which is inappropriate.

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

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/5918</th>
<th>Respondent: 10672417 / Matthew Kalupka</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1</td>
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<table>
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<tr>
<th>Comment ID: PSLPP16/13442</th>
<th>Respondent: 10701537 / Ben Gamble</th>
<th>Agent:</th>
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<tr>
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<th>Comment ID: PSLPP16/1518</th>
<th>Respondent: 10717985 / Alison Drennan</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>
I object - Post Brexit - with its economic uncertainties renders all the data used for this Policy unreliable.

I object - Slyfield is an existing and well-served locality in which to contain and adequately serve industrial and commercial businesses, not the rural environment. Development here would be inappropriate.

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

**Attached documents:**

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**Comment ID:** PSLPP16/5189  **Respondent:** 10720833 / S Bryon  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

I OBJECT TO FURTHER INDUSTRIAL SPACE AT BURNT COMMON AFTER THE 80% REDUCTION IN EMPLOYMENT SPACE IN 2013

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

**Attached documents:**

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**Comment ID:** PSLPP16/17909  **Respondent:** 10722049 / Richard Smith  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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:** PSLPP16/14783  **Respondent:** 10735777 / S. May  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
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<tr>
<th>Comment ID: PSLPP16/4975</th>
<th>Respondent: 10758593 / Richard &amp; Delia Baker</th>
<th>Agent:</th>
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<tr>
<th>Comment ID: PSLPP16/12202</th>
<th>Respondent: 10765249 / Andy &amp; Sonja Freebody</th>
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<th>Respondent: 10769121 / Ali Elson</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: PSLPP16/13598  Respondent:  10773441 / Barry Marshall  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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: PSLPP16/11540  Respondent:  10774145 / P Jordan  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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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I OBJECT TO POLICY E1 (EMPLOYMENT):

- Poor evidence base.
- Too much encouragement to low added-value employment that’s needed elsewhere in the country.
- Fails to concentrate general business activity in urban areas or business parks that have the infrastructure.
- Fails to differentiate this from appropriate rural business.
- Too much encouragement of warehousing, for which Guildford is too congested.

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

Attached documents:

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Comment ID: PSLPP16/15291  Respondent: 10782689 / Murray Dudgeon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

I OBJECT to the sustainable employment policy (Policy E1)

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Comment ID: PSLPP16/9124  Respondent: 10785633 / Penelope Eagle  Agent:
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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:** PSLPP16/333  **Respondent:** 10799169 / Neal Basson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

**POLICY E1 Meeting employment needs**

**OBJECT because**

- the evidence base is unreliable
- there is unclear differentiation between B class uses
- only high added-value business uses are desirable, not low grade, low employment warehousing which is land hungry
- industrial and commercial businesses must be concentrated in the urban area, or existing business parks (e.g. Slyfield) not in the rural environment which the infrastructure is unable to support
- the rural environment must support micro or high tech businesses, agricultural industries, and tourism, and these sectors must not be damaged by general industrial development which 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:** PSLPP16/18379  **Respondent:** 10799169 / Neal Basson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

**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: 10799169 / Neal Basson</th>
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<tr>
<th>Comment ID: PSLPP16/17529</th>
<th>Respondent: 10799425 / Guildford Greenbelt Group (Susan Parker)</th>
<th>Agent:</th>
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Full response

We OBJECT to this policy.
We need to distinguish between wanting to increase the added value of the economy and physical expansion, especially given the scarcity of land in Guildford. Guildford is not the place for large space hungry businesses. We believe Guildford should target high added-value small and medium sized enterprises or the headquarters of larger corporations, but not provide low added value warehousing and industrial space.

GBC appear to fail to appreciate the fundamental rationale of the Use Classes Order as a planning tool in terms of useful property market research or forward planning.

No proper analysis has been made of data held by GBC in respect of different B classes in terms of planning applications granted or evidence gathered by the economic development function at GBC without any attempt at real market demand apart from vague references to freely available market research undertaken by commercial estate agents. (See definitions of B classes at end of this policy response).

What we are left with is a fairly clumsy and poorly informed plan which clusters B classes without any appreciation of widely different employment impact and economic sustainability. E.g. B1 (mostly local office use/R&D) generates at least 5 times as much employment as B8 (distribution and warehousing).

This draft Local Plan is partly based on new findings by Aecom in the latest ELNA 2015 [Employment Land Needs Assessment 2015]. This includes the recasting of the ELNA by Aecom in 2015 which updated the ELNA 2013 prepared by GBC. We have had regard to the evidence base provided by Aecom in the 2015 ELNA and find it a more reliable evidence base for overall projected employment in the borough over the plan period in overall numbers than done previously by GBC in 2013. However, we have concern that the survey work by Lambert Smith Hampton is in the form of high level free property research that is used for the purposes of marketing their services over a wide area not specifically commissioned for the borough of Guildford and undertaken for ELNA purposes.

However, we are concerned that the research undertaken by Aecom is generally superficial and lacks sufficient detail and analysis between B1a, B1b, B1c, B2 and B8 use classes and that no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of office, research and development, light industrial, general industrial and warehousing and distribution floor space.

The lack of appreciation by GBC as to the opportunity for widely different uses being generated within B class clusters defeats the whole point of proper planning of employment uses and can significantly endanger previously good planning put forward in the previous 2003 plan. We support the concept of seeking increased investment in our local knowledge-based, high technology economy. This will provide well paid, creative jobs and generate the wealth necessary to fund the infrastructure and environment this sort of industry requires.

We need to promote the idea of new knowledge transfer in incubator units and small premises for new start up enterprises. We need to be on the wave of innovative new technology as opposed to older established businesses. High value-added industry is desirable; low tech, land-hungry older businesses which will increase congestion are not desirable.

We have concern as to the ill-informed clustering of all B classes. This is unclear in terms of market evidence required to inform effective planning. There is a failure to provide a clear understanding of business needs within the relevant area as required under Section 160 of the NPPF.

Little regard has been given in the plan to the economic reality of falling demand for B2 industrial space which is clustered with other B classes almost randomly throughout the plan. Little regard is had to the opportunity of B1b space as an opportunity for research and development which needs to be nurtured and preserved without the detrimental and confused clustering with other B classes both in terms of planning and promotion of a research hub.

We do not support the policy of creating Strategic Employment sites outside the urban centres.

Some of the strategic industrial sites would be better classified as brownfield land suitable for use as a residential area, eg Woodbridge Park, Woodbridge Road and Merrow Lane.
This study varies very significantly from the previous Guildford Borough Council ELNA 2013, which after two years has been completely re-written. This leads us to question the reliability of the evidence base here which has been used to justify the assumptions and plans; it is unclear that the current evidence base is any more reliable than that used previously. This calls into question the general reliability of the process of collection and interpretation of data in the overall forward planning process by GBC.

**DEFINITIONS:**

**B1**

*Business*

B1 building use is use for all or any of the following purposes:

(a) as an **office** other than a use within class A2 (financial and professional services),

(b) for **research** and **development** of products or processes, or

(c) for any industrial process, being a use which can be carried out in any residential area without detriment to the amenity of that area by reason of noise, vibration, smell, fumes, smoke, soot, ash, dust or grit.

**General Industrial**

B2 building use is for the carrying on of an industrial process other than one falling within class B1 above or within classes B3 to B7 below. (Note: B3-B7 relates to very heavy industry such as oil refining, smelting etc).

**Distribution or Storage**

B8 building use is for storage or as a distribution centre.

We note that there is a significant reduction of between 71% and 79% in the previous job target and resultant 79% reduction in employment space in response to the many objections lodged in 2014 against an unsubstantiated agenda for economic expansion in the last draft and based on new findings by Aecom in the latest ELNA 2015. We have concern as to the ill-informed clustering of all B classes in terms of the clarity of market evidence required to inform effective planning and a failure to provide a clear understanding of business needs required under Section 160 of the NPPF.

We also note the dramatic reduction in assessed demand by two Employment Land Needs Assessment Reports carried out under the same terms of reference within a period of 2 years which calls into question the general reliability of the process of collection and interpretation of data in the overall forward planning process by GBC. We do not support the policy of creating a Strategic Employment site at Garlick’s Arch (A43) in the Green Belt which is completely unnecessary due to the overall decrease in demand for industrial space which could be easily accommodated at Slyfield. We are concerned however that the research undertaken by Aecom is generally superficial and lacks sufficient detail and analysis between B1a, B1b, B1c, B2 and B8 use classes and that no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of office, research and development, light industrial, general industrial and warehousing and distribution floor space.

No proper analysis has been made of data held by GBC in respect of different B classes in terms of planning applications granted or evidence gathered by the economic development function at GBC and no robust assessment of local market demand apart from fairly brief references to freely available market research undertaken by commercial estate agents such as Lambert Smith Hampton covering a much wider area. GBC appear to fail to appreciate the fundamental rationale of the Use Classes Order as a planning tool in terms of useful property market research or forward planning. What we are left with is a fairly clumsy and poorly informed plan which clusters B classes without any appreciation of widely different employment impact and economic sustainability. E.g. B1 generates at least 5 times as much employment as B8. The lack of appreciation by GBC as to the opportunity for widely different uses being generated within B class clusters defeats the whole point of proper planning of employment uses and can significantly endanger previously good planning put forward.
in the previous 2003 plan. E.g. the creation of a research and development park linked to the University but now has the threat of being downgraded into a general business park (see below). Little regard has been given in the plan to the economic reality of falling demand for B2 industrial space which is clustered with other B classes almost randomly throughout the plan. Little regard is had to the opportunity of B1b space as an opportunity for research and development which needs to be nurtured and preserved without the detrimental and confused clustering with other B classes both in terms of planning and promotion of a research hub.

We note that the past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 derived from VoA analysis and that the calculated annual floor space demand is 0.7% over the plan period up to 2033. We support the concept of seeking increased investment in our local knowledge-based, high technology economy. This will provide well paid, creative jobs and generate the funding necessary to pay for the infrastructure and environment this sort of industry requires. We need to distinguish between wanting to increase the added value of the economy and physical expansion, especially given the scarcity of land in Guildford. Guildford is not the place for large space hungry businesses.

So we should target high added value small and medium sized enterprises rather than the headquarters of larger corporations. We need to promote the idea of new knowledge transfer in incubator units and small premises for new start up enterprises. They need to be on the wave of innovative new technology as opposed to older established businesses.

We object to the policy of creating a Strategic Employment at Garlicks Arch (A43) in the Green Belt. The stated requirement of 7,000 sq m (B1c, B2 and B8) could easily be accommodated at the Slyfield Regeneration site of 40 ha.

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

Attached documents:
1. POLICY E1

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (Blc), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

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

Attached documents:
I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be
developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far
more sustainable.

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

Attached documents:

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Comment ID: PSLPP16/6634  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 E1 - Meeting employment needs

  • The evidence base is unreliable;
  • There is unclear differentiation between B class uses;
  • Only high value-added business uses, contributing to a modern “knowledge economy”, are desirable, not ?low-

  • grade, low-employment warehousing which is also land hungry;
  • Industrial and commercial businesses must be concentrated in the urban area or existing business parks ?(e.g.

  Slyfield) not in the rural environment which the infrastructure is unable to support

  • The rural environment must support micro- or high-tech businesses, agricultural industries, and tourism, and these

  sectors must not be damaged by general industrial development which 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: PSLPP16/3871  Respondent: 10833537 / AC Vause  Agent:

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

I OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick's Arch, Send Marsh/Burnt Common {A43}, would be treated as a
Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial {B1c}, general industrial (B2) and
storage and distribution (B8) at Garlick's Arch (A43) is in the scheme of industrial development relatively small. Just to
the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could
accommodate a further development of 7,000 sq m. The Garlick's Arch site which is in the Green Belt should not be
developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far
more sustainable.

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

Attached documents:
I object to POLICY E1 - Meeting employment needs

- The evidence base is unreliable;
- There is unclear differentiation between B class uses;
- Only high value-added business uses, contributing to a modern “knowledge economy”, are desirable, not low-grade, low-employment warehousing which is also land hungry;
- Industrial and commercial businesses must be concentrated in the urban area or existing business parks (e.g. Slyfield) not in the rural environment which the infrastructure is unable to support;
- The rural environment must support micro- or high-tech businesses, agricultural industries, and tourism, and these sectors must not be damaged by general industrial development which is inappropriate.

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 E1 “sustainable employment” on the grounds that;

1.2 There is a significant reduction of between 71% and 79% in the previous job target and resultant 79% reduction in employment space in response to the many objections lodged in 2014 against an unsubstantiated agenda for economic expansion in the last draft and based on new findings by Aecom in the latest ELNA 2015.

1.3 The ill-informed clustering of all B classes in terms of the clarity of market evidence required to inform effective planning and a failure to provide a clear understanding of business needs required under Section 160 of the NPPF.

1.4 The dramatic reduction in assessed demand by two Employment Land Needs Assessment Reports carried out under the same terms of reference within a period of 2 years which calls into question the general reliability of the process of collection and interpretation of data in the overall forward planning process by GBC. I do not support the policy of creating a Strategic Employment site at Garlick’s Arch (A43) in the Green Belt which is completely unnecessary due to the overall decrease in demand for industrial space which could be easily accommodated at Slyfield.

1.5 That the research undertaken by Aecom is generally superficial and lacks sufficient detail and analysis between B1a, B1b, B1c, B2 and B8 use classes and that no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of office, research and development, light industrial, general industrial and warehousing and distribution floor space.

1.6 No proper analysis has been made of data held by GBC in respect of different B classes in terms of planning applications granted or evidence gathered by the economic development function at GBC and no robust assessment of local market demand apart from fairly brief references to freely available market research undertaken by commercial estate agents such as Lambert Smith Hampton covering a much wider area.

1.7 GBC appear to fail to appreciate the fundamental rationale of the Use Classes Order as a planning tool in terms of useful property market research or forward planning.
1.8 What we are left with is a fairly clumsy and poorly informed plan which clusters B classes without any appreciation of widely different employment impact and economic sustainability. E.g. B1 generates at least 5 times as much employment as B8.

1.9 The lack of appreciation by GBC as to the opportunity for widely different uses being generated within B class clusters defeats the whole point of proper planning of employment uses and can significantly endanger previously good planning put forward in the previous 2003 plan. E.g. the creation of a research and development park linked to the University but now has the threat of being downgraded into a general business park (see below).

1.10 Little regard has been given in the plan to the economic reality of falling demand for B2 industrial space which is clustered with other B classes almost randomly throughout the plan.

1.11 Little regard is had to the opportunity of B1 b space as an opportunity for research and development which needs to be nurtured and preserved without the detrimental and confused clustering with other B classes both in terms of planning and promotion of a research hub.

1.12 I note that the past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 derived from VoA analysis and that the calculated annual floor space demand is 0.7% over the plan period up to 2033.

1.13 I support the concept of seeking increased investment in our local knowledge-based, high technology economy. This will provide well paid, creative jobs and generate the funding necessary to pay for the infrastructure and environment this sort of industry requires.

1.14 We need to distinguish between wanting to increase the added value of the economy and physical expansion, especially given the scarcity of land in Guildford. Guildford is not the place for large space hungry businesses. So i should target high added value small and medium sized enterprises rather than the headquarters of larger corporations.

1.15 We need to promote the idea of new knowledge transfer in incubator units and small premises for new start up enterprises. They need to be on the wave of innovative new technology as opposed to older established businesses.

1.16 I object to the policy of creating a Strategic Employment at Garlicks Arch (A43) in the Green Belt. The stated requirement of 7,000 sq m (B1c, B2 and B8) could easily be accommodated at the Slyfield Regeneration site of 40 ha.

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

Attached documents:

Comment ID: pslp171/1108  Respondent: 10846625 / Frank Drennan  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy E1  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

I object to the change in Policy E1 of proposed designation of Burnt Common as an Industrial Strategic Employment Site.

- It was deleted from the 2014 draft because of all the local objections made previously and there is no logical reason to go back on this decision
- The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land as shown in the Employment Land Needs Assessment 2017
- There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have many empty sites and industrial units
- The 2017 Employment Land Need Assessment shows a reduction in demand to a low of 3.7 and a high of 4.1 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Burnt Common in the Green Belt
• There are patently no exceptional circumstances in terms of demand for employment space to build on this important area of Green Belt which effectively separates existing development in Send and Ripley and prevents urban sprawl
• The impact on small surrounding roads will create traffic gridlock
• It will join up existing villages and defeat the purpose of the Green Belt

I also object to the potential inclusion at Burnt Common of a waste management facility mentioned at the change to paragraph 4.423a which lacks sufficient detail for proper consultation and is completely inappropriate

I object to the fact that no reliable analysis has yet been made of data held by GBC in respect of different B classes in terms of planning applications granted or evidence gathered by the economic development function at GBC and no robust assessment of local market demand apart from fairly brief references to freely available market research undertaken by commercial estate agents such as Lambert Smith Hampton covering a much wider area.

The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

38,357sqm of B1c, B2 or B8 use class is quite sufficient supply for the plan period and does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

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

Attached documents:
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It was deleted from the 2014 draft because of all the local objections made previously and there is no logical reason to go back on this decision.

There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have many empty sites and industrial units.

There are patently no exceptional circumstances in terms of demand for employment space to build on this important area of Green Belt which effectively separates existing development in Send and Ripley and prevents urban sprawl.

It will join up existing villages and defeat the purpose of the Green Belt.

I also object to the potential inclusion at Burnt Common of a waste management facility mentioned at the change to paragraph 4.423a which lacks sufficient detail for proper consultation and is completely inappropriate.

I object to the ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 which generally is superficial and lacks sufficient detail and analysis between B1a, B1b, B1c, B2 and B8 use classes and that no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of office, research and development, light industrial, general industrial and warehousing and distribution floor space.

I object to the fact that no reliable analysis has yet been made of data held by GBC in respect of different B classes in terms of planning applications granted or evidence gathered by the economic development function at GBC and no robust assessment of local market demand apart from fairly brief references to freely available market research undertaken by commercial estate agents such as Lambert Smith Hampton covering a much wider area.

GBC in their role as a Planning Authority appear to fail to appreciate the fundamental rationale of the Use Classes Order as a planning tool in terms of procurement of useful property market research analysis or forward planning.

What we are left with is a fairly clumsy and poorly informed plan which clusters B classes without any appreciation of widely different employment impact and economic sustainability. E.g. B1 generates at least 5 times as much employment as B8.

The lack of appreciation by GBC as to the opportunity for widely different uses being generated within B class clusters defeats the whole point of proper planning of employment uses and can significantly endanger previously good planning put forward in the previous 2003 plan. E.g. the creation of a research and development park linked to the University but now has the threat of being downgraded into a general business park (see below).

Little regard has been given in the plan to the economic reality of falling demand for B2 industrial space which is clustered with other B classes almost randomly throughout the plan.

The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

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1.13  Little regard is **still not given** to the opportunity of specific B1 b space as an opportunity for research and development which needs to be nurtured and preserved without the detrimental and confused clustering with other B classes both in terms of planning and promotion of a research hub.

1.14  I support the concept of seeking increased investment in our local knowledge-based, high technology economy. This will provide well paid, creative jobs and generate the funding necessary to pay for the infrastructure and environment this sort of industry requires.

1.15  We need to distinguish between wanting to increase the added value of the economy and physical expansion, especially given the scarcity of land in Guildford. Guildford is not the place for large space hungry businesses. So I should target high added value small and medium sized enterprises rather than the headquarters of larger corporations.

1.16  We need to promote the idea of new knowledge transfer in incubator units and small premises for new start up enterprises. They need to be on the wave of innovative new technology as opposed to older established businesses.

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

**Attached documents:**

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**Comment ID:** PSLPP16/7173  **Respondent:** 10854113 / Sarah Pickering  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

WE OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site, which is in the Green Belt, should not be developed as a Strategic Employment Site when there is a suitable alternative Brownfield site very close by, which is far more 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?

Attached documents:

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I OBJECT to this policy

The evidence base is flawed and unreliable. Only high added-value business uses are desirable and the rural environment should not support general industrial 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 this policy

The evidence base is flawed and unreliable. Only high added-value business uses are desirable and the rural environment should not support general industrial 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 policy E1 sustainable employment**

I note that there is a significant reduction of between 71% and 79% in the previous job target and resultant 79% reduction in employment space in response to the many objections lodged in 2014 against an unsubstantiated agenda for economic expansion in the last draft and based on new findings by Aecom in the latest ELNA 2015.

I have concern as to the ill-informed clustering of all B classes in terms of the clarity of market evidence required to inform effective planning and a failure to provide a clear understanding of business needs required under Section 160 of the NPPF.

I also note the dramatic reduction in assessed demand by two Employment Land Needs Assessment Reports carried out under the same terms of reference within a period of 2 years which calls into question the general reliability of the process of collection and interpretation of data in the overall forward planning process by GBC. I do not support the policy of creating a Strategic Employment site at Garlick’s Arch (A43) in the Green Belt which is completely unnecessary due to the overall decrease in demand for industrial space which could be easily accommodated at Slyfield.

I am concerned however that the research undertaken by Aecom is generally superficial and lacks sufficient detail and analysis between B1a, B1b, B1c, B2 and B8 use classes and that no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of office, research and development, light industrial, general industrial and warehousing and distribution floor space.

No proper analysis has been made of data held by GBC in respect of different B classes in terms of planning applications granted or evidence gathered by the economic development function at GBC and no robust assessment of local market demand apart from fairly brief references to freely available market research undertaken by commercial estate agents such as Lambert Smith Hampton covering a much wider area.

GBC appear to fail to appreciate the fundamental rationale of the Use Classes Order as a planning tool in terms of useful property market research or forward planning.

What we are left with is a fairly clumsy and poorly informed plan which clusters B classes without any appreciation of widely different employment impact and economic sustainability. E.g. B1 generates at least 5 times as much employment as B8.

The lack of appreciation by GBC as to the opportunity for widely different uses being generated within B class clusters defeats the whole point of proper planning of employment uses and can significantly endanger previously good planning put forward in the previous 2003 plan. E.g. the creation of a research and development park linked to the University but now has the threat of being downgraded into a general business park (see below).

Little regard has been given in the plan to the economic reality of falling demand for B2 industrial space which is clustered with other B classes almost randomly throughout the plan.

Little regard is had to the opportunity of B1b space as an opportunity for research and development which needs to be nurtured and preserved without the detrimental and confused clustering with other B classes both in terms of planning and promotion of a research hub.

I note that the past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 derived from VoA analysis and that the calculated annual floor space demand is 0.7% over the plan period up to 2033.

I support the concept of seeking increased investment in our local knowledge-based, high technology economy. This will provide well paid, creative jobs and generate the funding necessary to pay for the infrastructure and environment this sort of industry requires.
We need to distinguish between wanting to increase the added value of the economy and physical expansion, especially given the scarcity of land in Guildford. Guildford is not the place for large space hungry businesses. So I should target high added value small and medium sized enterprises rather than the headquarters of larger corporations.

We need to promote the idea of new knowledge transfer in incubator units and small premises for new start up enterprises. They need to be on the wave of innovative new technology as opposed to older established businesses. I object to the policy of creating a Strategic Employment at Garlicks Arch (A43) in the Green Belt. The stated requirement of 7,000 sq m (B1c, B2 and B8) could easily be accommodated at the Slyfield Regeneration site of 40 ha.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/1949</th>
<th>Respondent: 10859489 / Jennifer Procter</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E1</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 E1 SUSTAINABLE EMPLOYMENT

1.1 I object to the change in Policy E1 sustainable employment because they have not addressed many of the 32,000 objections made to the 2016 plan.

1.2 I object to the inclusion of Send Business Centre/Tannery Studios Tannery Lane, Send in relation to proposed inset from the Green Belt because:

1.3 It is effectively an old non-conforming user in an area of outstanding countryside

1.4 It is adjacent to the beautiful Wey Navigation

1.5 There is highly restricted vehicular access along Tannery Lane in both directions

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

1.7 I object to the change in Policy E1 of proposed designation of Burnt Common as an Industrial Strategic Employment Site.

1.8 It was deleted from the 2014 draft because of all the local objections made previously and there is no logical reason to go back on this decision

1.9 The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land as shown in the Employment Land Needs Assessment 2017

1.10 There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have many empty sites and industrial units

1.11 The 2017 Employment Land Need Assessment shows a reduction in demand to a low of 3.7 and a high of 4.1 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Burnt Common in the Green Belt

1.12 There are patently no exceptional circumstances in terms of demand for employment space to build on this important area of Green Belt which effectively separates existing development in Send and Ripley and prevents urban sprawl
1.13 The impact on small surrounding roads will create traffic gridlock.

1.14 It will join up existing villages and defeat the purpose of the Green Belt.

1.15 I also object to the potential inclusion at Burnt Common of a waste management facility mentioned at the change to paragraph 4.423a which lacks sufficient detail for proper consultation and is completely inappropriate.

1.16 I object to the ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 which generally is superficial and lacks sufficient detail and analysis between B1a, B1b, B1c, B2 and B8 use classes and that no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of office, research and development, light industrial, general industrial and warehousing and distribution floor space.

1.17 I object to the fact that no reliable analysis has yet been made of data held by GBC in respect of different B classes in terms of planning applications granted or evidence gathered by the economic development function at GBC and no robust assessment of local market demand apart from fairly brief references to freely available market research undertaken by commercial estate agents such as Lambert Smith Hampton covering a much wider area.

1.18 GBC in their role as a Planning Authority appear to fail to appreciate the fundamental rationale of the Use Classes Order as a planning tool in terms of procurement of useful property market research analysis or forward planning.

1.19 What we are left with is a fairly clumsy and poorly informed plan which clusters B classes without any appreciation of widely different employment impact and economic sustainability. E.g. B1 generates at least 5 times as much employment as B8.

1.20 The lack of appreciation by GBC as to the opportunity for widely different uses being generated within B class clusters defeats the whole point of proper planning of employment uses and can significantly endanger previously good planning put forward in the previous 2003 plan. E.g. the creation of a research and development park linked to the University but now has the threat of being downgraded into a general business park (see below).

1.21 Little regard has been given in the plan to the economic reality of falling demand for B2 industrial space which is clustered with other B classes almost randomly throughout the plan.

1.22 The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.

" 1.23 38,357sqm of B1c, B2 or B8 use class is quite sufficient supply for the plan period and does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

1.24 Little regard is still not given to the opportunity of specific B1b space as an opportunity for research and development which needs to be nurtured and preserved without the detrimental and confused clustering with other B classes both in terms of planning and promotion of a research hub.

1.25 I support the concept of seeking increased investment in our local knowledge-based, high technology economy. This will provide well paid, creative jobs and generate the funding necessary to pay for the infrastructure and environment this sort of industry requires.

1.26 We need to distinguish between wanting to increase the added value of the economy and physical expansion, especially given the scarcity of land in Guildford. Guildford is not the place for large space hungry businesses. So i should target high added value small and medium sized enterprises rather than the headquarters of larger corporations.
1.27 We need to promote the idea of new knowledge transfer in incubator units and small premises for new start up enterprises. They need to be on the wave of innovative new technology as opposed to older established businesses.

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

Attached documents:

Comment ID: PSLPP16/16018  Respondent: 10859553 / MARK Curtis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

POLICY E1 SUSTAINABLE EMPLOYMENT

I object to policy E1 sustainable employment.

I note that there is a significant reduction of between 71% and 79% in the previous job target and resultant 79% reduction in employment space in response to the many objections lodged in 2014 against an unsubstantiated agenda for economic expansion in the last draft and based on new findings by Aecom in the latest ELNA 2015.

I have concern as to the ill-informed clustering of all B classes in terms of the clarity of market evidence required to inform effective planning and a failure to provide a clear understanding of business needs required under Section 160 of the NPPF.

I also note the dramatic reduction in assessed demand by two Employment Land Needs Assessment Reports carried out under the same terms of reference within a period of 2 years which calls into question the general reliability of the process of collection and interpretation of data in the overall forward planning process by GBC. I am concerned however that the research undertaken by Aecom is generally superficial and lacks sufficient detail and analysis between B1a, B1b, B1c, B2 and B8 use classes and that no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of office, research and development, light industrial, general industrial and warehousing and distribution floor space.

No proper analysis has been made of data held by GBC in respect of different B classes in terms of planning applications granted or evidence gathered by the economic development function at GBC and no robust assessment of local market demand apart from fairly brief references to freely available market research undertaken by commercial estate agents such as Lambert Smith Hampton covering a much wider area.

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Little regard has been given in the plan to the economic reality of falling demand for B2 industrial space which is clustered with other B classes almost randomly throughout the plan.
Little regard is given to the opportunity of B1 b space as an opportunity for research and development which needs to be nurtured and preserved without the detrimental and confused clustering with other B classes both in terms of planning and promotion of a research hub.

I note that the past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 derived from VoA analysis and that the calculated annual floor space demand is 0.7% over the plan period up to 2033.

I support the concept of seeking increased investment in our local knowledge-based, high technology economy. This will provide well paid, creative jobs and generate the funding necessary to pay for the infrastructure and environment this sort of industry requires.

We need to distinguish between wanting to increase the added value of the economy and physical expansion, especially given the scarcity of land in Guildford. Guildford is not the place for large space hungry businesses. So I should target high added value small and medium sized enterprises rather than the headquarters of larger corporations.

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

Attached documents:

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<th>Comment ID: PSLPP16/1601</th>
<th>Respondent: 10865537 / Edwina Fassom</th>
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<tr>
<td>1. I OBJECT to the sustainable employment policy (Policy E1)</td>
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If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

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: PSLPP16/11005</th>
<th>Respondent: 10878977 / Lisbet Hjort Jensen</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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I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to
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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: PSLPP16/1100  Respondent: 10884993 / Dave Fassom  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

1. I OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

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

Attached documents:

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Comment ID: PSLPP16/6845  Respondent: 10889985 / Ruth Macdonald  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is, in the scheme of industrial development, relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

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

Attached documents:
POLICY E1

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

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

Attached documents:
POLICY E1 – Meeting Employment Needs
I OBJECT to this policy as there is insufficient infrastructure to support development of industry in rural areas.
Employment needs must be met in urban areas or existing business parks.

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

Attached documents:

Comment ID: PSLPP16/14771   Respondent: 10920129 / Steven Marshall   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

Meeting employment needs OBJECT. Building industrial and commercial enterprises in a rural environment is the worst of both worlds – it destroys the character of the rural environment and will again have an adverse effect on the environment as employees will have to travel to work.

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

Attached documents:

Comment ID: PSLPP16/11319   Respondent: 10923297 / Matthew Burnham   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

I OBJECT TO POLICY E1 (EMPLOYMENT):

• Poor evidence base.
• Too much encouragement to low added-value employment that’s needed elsewhere in the country.
• Fails to concentrate general business activity in urban areas or business parks that have the infrastructure.
• Fails to differentiate this from appropriate rural business.
• Too much encouragement of warehousing, for which Guildford is too congested.

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

Attached documents:

Comment ID: PSLPP16/8981   Respondent: 10928737 / Guy Pashley   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

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If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment 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: PSLPP16/1710</th>
<th>Respondent: 10933793 / Julia Tilbury</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY E1 - Meeting employment needs

I OBJECT because -

- The evidence base is unreliable;
- There is unclear differentiation between B class uses;
- Only high value-added business uses, contributing to a modern "knowledge economy", are desirable, not low-grade, low-employment warehousing which is also land hungry;
- Industrial and commercial businesses must be concentrated in the urban area or existing business parks
- (e.g. Slyfield) not in the rural environment which the infrastructure is unable to support;

"10 See footnote 3 above .

- The rural environment must support micro- or high-tech businesses, agricultural industries, and tourism, and these sectors must not be damaged by general industrial development which is inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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**POLICY E1 - Meeting employment needs**

I OBJECT because -

The evidence base is unreliable;

There is unclear differentiation between B class uses;

Only high value-added business uses, contributing to a modern "knowledge economy", are desirable, not low-grade, low-employment warehousing which is also land hungry;

Industrial and commercial businesses must be concentrated in the urban area or existing business parks (e.g. Slyfield) not in the rural environment which the infrastructure is unable to support;

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The rural environment must support micro- or high-tech businesses, agricultural industries, and tourism, and these sectors must not be damaged by general industrial development which is inappropriate.

**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: PSLPP16/15367</th>
<th>Respondent: 10935201 / Cathryn Walton</th>
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I OBJECT because - the evidence base is unreliable; there is unclear differentiation between B class uses; only high value-added business uses, contributing to a modern “knowledge economy”, are desirable, not low-grade, low-employment warehousing which is also land hungry; industrial and commercial businesses must be concentrated in the urban area or existing business parks (e.g. Slyfield) not in the rural environment which the infrastructure is unable to support; the rural environment must support micro- or high-tech businesses, agricultural industries, and tourism, and these sectors must not be damaged by general industrial development which is inappropriate.

**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: PSLPP16/12802</th>
<th>Respondent: 10940833 / Natasha Taylor</th>
<th>Agent:</th>
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</table>
I object to the inclusion of a strategic employment site at Gosden Hill Farm (Policy A25). Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch (Policy A43). It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development. The site is in any event subject to frequent flooding and unsuitable for development. If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

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: PSLPP16/9282  Respondent: 10944161 / Stephen Benzikie  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

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The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

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

Attached documents:

Comment ID: pslp171/664  Respondent: 10944513 / Amber Ellis  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy E1

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

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution
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I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

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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: PSLPP16/15796  Respondent: 10953249 / Charlotte Ladd  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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: PSLPP16/4644  Respondent: 10957025 / Pauline Masters  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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: pslp171/2412  Respondent: 10957857 / Adam Aaronson  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy E1  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

I object to Employment land – POLICY E1, E2 - It seems as if GBC has not noticed the change in national trends, which indicate that too much potential development land within the town centre is being allocated for retail or commercial development rather than housing. High added value businesses are welcome in the borough, but much of the employment land is designated for retail or low added value employment floorspace, which only exacerbates current issues such as lack of low cost housing and heavy traffic. Sites such as the Burnt Common Triangle, currently in the Green Belt, are inappropriate for heavy industry,

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

Attached documents:

Comment ID: PSLPP16/6653  Respondent: 10958753 / Ingrid Molossi  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1  
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Comment ID: PSLPP16/10480  Respondent: 10960033 / Lucinda Kalupka  Agent:

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Comment ID: PSLPP16/12281  Respondent: 10962689 / Martin Ladd  Agent:

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

Attached documents:
• the evidence base is unreliable
• there is unclear differentiation between B class uses
• only high added-value business uses are desirable, not low grade, low employment warehousing which is land hungry
• industrial and commercial businesses must be concentrated in the urban area, or existing business parks (e.g. Slyfield) not in the rural environment which the infrastructure is unable to support
• the rural environment must support micro or high tech businesses, agricultural industries, and tourism, and these sectors must not be damaged by general industrial development which 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:** PSLPP16/4987  **Respondent:** 10986689 / Richard Harris  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

**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:** PSLPP16/8979  **Respondent:** 10987905 / Marika Chandler  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

**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: PSLPP16/8375</th>
<th>Respondent: 10989601 / Margaret Mew</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1</td>
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<th>Comment ID: PSLPP16/8325</th>
<th>Respondent: 10990145 / Anne Lee</th>
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Attached documents:
POLICY E1: Sustainable employment

We support the general policy statements made in this policy, whilst having no opinion on the scale of the new office space and industrial land area being proposed by GBC.

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

Attached documents:

Comment ID: pslp171/558  Respondent: 11001505 / Greta Edwards  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E1

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

Employment land – POLICY E1, E2

Contrary to national trends, too much potential development land within the town centre is being allocated for retail or commercial development rather than housing. High added value businesses are welcome in the borough, but much of the employment land is designated for retail or low added value employment floorspace, which only exacerbates current issues such as lack of low cost housing and heavy traffic. Sites such as the Burnt Common Triangle, currently in the Green Belt, are inappropriate for heavy industry,

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

Attached documents:

Comment ID: PSLPP16/15290  Respondent: 11007393 / James Culmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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: PSLPP16/3963   Respondent: 11008225 / Russell Pascoe   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1
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Comment ID: PSLPP16/7556   Respondent: 11010401 / J M Bates   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2452  Respondent: 11014881 / Linda Peters-Smith  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

Policy E1 - Meeting Employment Needs

I object. The evidence base is not reliable. Industrial and commercial businesses must be concentrated in the urban or existing industrial areas that have infrastructure to support it rather than the rural areas.

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

Attached documents:

Comment ID: PSLPP16/2046  Respondent: 11023585 / Jean Walker  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

5. OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

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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:

I object on the basis of how this is being applied - The housing identified for East and West Horsley is clearly targeted to maximize profits for housing developers by all but two sites being in walking distance of a commuter station to London. Therefore these sites are targeted for London employment, and hence the policy is not being applied to the choice of locations.

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

Attached documents:

We are calling on the Council to increase the land allocated for offices and manufacturing. We envision Guildford Borough to be a city in its own right and go beyond the commuter town envisaged by the current Executive Committee.

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

Attached documents:
I object to policy E1 sustainable employment. I note that there is a significant reduction of between 71% and 79% in the previous job target and resultant 79% reduction in employment space in response to the many objections lodged in 2014 against an unsubstantiated agenda for economic expansion in the last draft and based on new findings by Aecom in the latest ELNA 2015. I have concern as to the ill-informed clustering of all B classes in terms of the clarity of market evidence required to inform effective planning and a failure to provide a clear understanding of business needs required under Section 160 of the NPPF. I also note the dramatic reduction in assessed demand by two Employment Land Needs Assessment Reports carried out under the same terms of reference within a period of 2 years which calls into question the general reliability of the process of collection and interpretation of data in the overall forward planning process by GBC. I am concerned however that the research undertaken by Aecom is generally superficial and lacks sufficient detail and analysis between B1a, B1b, B1c, B2 and B8 use classes and that no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of office, research and development, light industrial, general industrial and warehousing and distribution floor space. No proper analysis has been made of data held by GBC in respect of different B classes in terms of planning applications granted or evidence gathered by the economic development function at GBC and no robust assessment of local market demand apart from fairly brief references to freely available market research undertaken by commercial estate agents such as Lambert Smith Hampton covering a much wider area. GBC appear to fail to appreciate the fundamental rationale of the Use Classes Order as a planning tool in terms of useful property market research or forward planning. What we are left with is a fairly clumsy and poorly informed plan which clusters B classes without any appreciation of widely different employment impact and economic sustainability. E.g. B1 generates at least 5 times as much employment as B8. The lack of appreciation as to the opportunity for widely different uses being generated within B class clusters defeats the whole point of proper planning of employment uses and can significantly endanger previously good planning put forward in the previous 2003 plan. E.g. the creation of a research and development park linked to the University but now has the threat of being downgraded into a general business park (see below). Little regard has been given in the plan to the economic reality of falling demand for B2 industrial space which is clustered with other B classes almost randomly throughout the plan. Little regard is given to the opportunity of B1 b space as an opportunity for research and development which needs to be nurtured and preserved without the detrimental and confused clustering with other B classes both in terms of planning and promotion of a research hub. I note that the past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 derived from VoA analysis and that the calculated annual floor space demand is 0.7% over the plan period up to 2033. I support the concept of seeking increased investment in our local knowledge-based, high technology economy. This will provide well paid, creative jobs and generate the funding necessary to pay for the infrastructure and environment this sort of industry requires. We need to distinguish between wanting to increase the added value of the economy and physical expansion, especially given the scarcity of land in Guildford. Guildford is not the place for large space hungry businesses. So I should target high added value small and medium sized enterprises rather than the headquarters of larger corporations.

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

Attached documents:

Comment ID: PSLPP16/14592  Respondent: 11036801 / Judith Mercer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

I OBJECT to Policy E1(Employment)

This fails to focus general business (industrial and commercial) activity in the urban areas or business parks that have the infrastructure already.

It does not make a comparison between this and appropriate rural business.
There is too much proposal for warehousing which already causes congestion for Guildford. Analysis to support the policy is weak.

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

Attached documents:

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**Comment ID:** PSLPP16/7329  **Respondent:** 11041121 / Catherine Dean  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

I object to this policy for the following reasons.

1. I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

1. The site is in any event subject to frequent flooding and contains ancient woodland and is unsuitable for development.

1. I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on 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:** PSLPP16/1900  **Respondent:** 11041281 / Chris Harlow  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
5. I OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

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

Attached documents:

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Comment ID: PSLPP16/11549  Respondent: 11042433 / Sam Thompson  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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: PSLPP16/12707  Respondent: 11042433 / Sam Thompson  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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 inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

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

Attached documents:

Comment ID: PSLPP16/8765  Respondent: 11046593 / ANGELA GUNNING  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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: PSLPP16/4868  Respondent: 11047329 / Hazel Corstin  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

1. POLICY E1

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution
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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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<tr>
<th>Comment ID: PSLPP16/12957</th>
<th>Respondent: 11047873 / Mary Waldner</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1</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:** PSLPP16/7555  **Respondent:** 11049473 / Victor Bates  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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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:** pslp171/250  **Respondent:** 11051521 / J and M Baylis  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy E1

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

Number of new jobs increased from 3,200 to 4,100 but floor space and land provision reduced. Is this justifiable?
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslpp171/985  Respondent: 11053825 / Claire Owen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E1

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

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<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/1562</th>
<th>Respondent:</th>
<th>11061345 / Ewbank's Organisation</th>
<th>Agent:</th>
<th>DMH Stallard LLP (Geoff Smith)</th>
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</thead>
</table>

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy E1

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

### 1. Introduction

1.1 DMH Stallard act on behalf of ‘Ewbanks’, on planning matters in relation to the Ewbank’s Burnt Common Auction Rooms site, which is located to the south of the settlement of Send Marsh/Burnt Common. It is 3.49 hectares (8.62 acres) in area.

1.2 These representations relate to the Proposed Changes to the ‘Guildford Borough Proposed Submission Local Plan: Strategy and Sites June 2016’, which covers the period to 2034.

1.3 Our representations focus on objecting to the exclusion of the Ewbank’s Burnt Common Auction Room site from the proposed new Industrial Strategic Employment Site at Burnt Common (Policy E1(8)).

1.4 In our representations on the ‘Proposed Submission Local Plan : Strategy and Sites – June 2016; we objected to the proposed removal of the allocation of Land around Burnt Common Warehouse for employment uses, (including the Ewbank’s site). We therefore support the re-instatement of most of this allocation through the Proposed Amendment to Policy E1(8) and Site Allocation A58, but strongly object to the exclusion of the Ewbank’s site from this Proposed Amendment.

1.5 The ‘Ewbank’s Site’ has consistently been included as part of this proposed employment site in earlier versions of this Local Plan. It was in the Draft Local Plan (2014) as Site 74, and also in the Draft Version of the Proposed Submission Local Plan considered by the Guildford Borough’s Economy and Infrastructure Executive Board on 13th April 2016, and in the papers for the meeting of the Borough Council’s Executive Committee. The Report to the Executive stated about this whole site:- “Send Marsh/Burnt Common – the site is located in a yellow (medium) sensitivity land parcel. Our Employment Land Needs Assessment identifies a need for industrial land and this site is the only suitable and deliverable site identified by the Green Belt and Countryside Study that could meet this need”.

1.6 In the light of this statement, and in the subsequent decision by the Borough Council to re-instate land at Burnt Common as an Industrial Strategic Employment Site, we can see no reason why the Ewbank’s site is now excluded from this allocation. It forms an integral part of this whole site, and we submit that there are no planning policy reasons for its omission from this proposed allocation.

1.7 The suitability of including the Ewbank’s site in this strategic employment allocation was also underlined in the Guildford Borough’s Land Availability Assessment February 2016, where it stated that this ‘combined site would help towards meeting employment need, and there is no known reason why well designed commercial uses in this location should have any unacceptable impact’. We are therefore very concerned to note that in the 2017 Amendment to this Land Availability Assessment, it states that the Ewbank’s site is now excluded from this employment site, without giving any reasons. It states:-

“The sites boundary has been amended from that previously proposed on the site in the draft Local Plan (2014) to exclude a triangular-shaped parcel of land in the southwest corner and the existing distribution centre”.

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“The sites boundary has been amended from that previously proposed on the site in the draft Local Plan (2014) to exclude a triangular-shaped parcel of land in the southwest corner and the existing distribution centre”.
There is only a brief reference to this change in the Employment Topic Paper – June 2017 in paragraph 4.55:-

“The site has however been reduced in area to that previously identified in 2014 which addresses the issues related to perceived coalescence”.

This statement clearly contradicts the findings of the Borough Council’s own Green Belt and Countryside Study, which gave no such concerns on coalescence, and considered this whole site suitable for exclusion from the Green Belt.

1.8 In objecting to Policy E1(8) we will be making reference throughout these submissions to the relevant ‘evidence base’ documents. These include:-

- Topic Paper : Employment – June 2017
- Topic Paper : Green Belt and the Countryside – June 2017
- Employment Land Needs Assessment – March 2017
- Guildford Borough Economic Strategy 2013 - 2031
- Guildford Borough Land Availability Assessment – February 2016 and June 2017

We will also be making reference to documents related to these ‘evidence bases’ including the Guildford Green Belt and Countryside Studies.

1.9 In the following Sections we will address the following matters in support of our submission that the “Ewbank’s Site” should be included within the proposed Industrial Strategic Employment Site at Burnt Common:-

- Proposed Amendment : New Employment Floorspace - Policy E1(1)
- Proposed Amendment : Green Belt Boundary – Policy E1(8) and site A58
- Proposed Amendment : New Site Allocation – Policy E1(8) and site A58

1.10 In addressing each of these matters, we will set out why we consider that the relevant Policy is ‘unsound’, and what changes to the Plan are required to make it sound.

2. Proposed Amendment – New Employment Floorspace (Policy E1(1))

2.1 This objection relates to the proposed amendment to Policy E1(1), which proposes changes to the proposed employment floorspace as follows:-

- Reduction in new industrial land (B1(c), B2 and B8):-
  - Lower range from 4.7 hectares to 3.7 hectares
  - Upper range from 5.3 hectares to 4.1 hectares

2.2 We submit that these reductions in new industrial land are unsound, and, rather than reducing the new industrial floorspace, it should be significantly increased. We consider that these current floorspace proposals are unsound, as these estimates are not based on a positively prepared planning strategy which seeks to meet objectively assessed development and infrastructure requirements. Nor is it consistent with national policy, as set out in the National Planning Policy Framework, which seeks to secure economic growth in order to create jobs and prosperity. This is one of the three dimensions of sustainable development, which is seen as the ‘golden thread’ running through plan making.

2.3 This need to provide sufficient employment land for the period of the Local Plan is confirmed in the Guildford Borough Employment Land Needs Assessment - March 2017. In estimating the additional industrial/storage land required in paragraph 7.2.4 of this Assessment, it recognises in paragraph 7.2.5 that:

“Demand for employment land within Guildford could be higher than these and land floorspace forecasts. Employment within the borough has the potential to grow more quickly than currently anticipated, while demand for additional space on the part of businesses already located within the borough could be higher given the extent to which employment densities have risen in recent years”.
2.4 In the light of these comments, the Local Plan should increase these estimates in Policy E1(8), to provide the flexibility to enable an increased amount of employment space to be accommodated in the Borough. This additional employment land should be focussed on identified strategic employment sites. The only strategic employment site east of Guildford town, and within easy reach of the strategic road network is Land around Burnt Common, Send. The addition of the Ewbank’s site would provide an additional 3.49 hectares of strategic employment land, which would provide this flexibility over the period of the Local Plan (to 2034).

2.5 We do not consider that the Borough Council’s Employment Topic Paper – June 2017 accurately reflects the conclusions and recommendations of the Guildford Borough Employment Land Needs Assessment – March 2017, as it limits to proposed employment floorspace for B1c/B2/B8 to the same amount as that stated in the Assessments conclusions, but without providing any allowance for flexibility (paragraphs 4.7 to 4.10). The 2017 Assessment is very clear that demand for employment land within Guildford could be higher than the forecasts, and this should be reflected in the amount of land allocated for B1(c), B2 and B8 employment in this Local Plan. No such flexibility is proposed and the Local Plan currently even proposes a reduction in both the lower and upper ranges of new B1(c), B2 and B8 floorspace, (Policy E1(8)). As such we do not consider that this part of the Local Plan is ‘positively prepared,’ and is therefore unsound.

2.6 These objections incorporate an Employment Statement by Kingstons, independent commercial agents, based in Guildford, who specialise in the office and industrial warehouse sectors in Surrey and neighbouring counties (Appendix C). This Employment Statement provides strong evidence for the need for the Local Plan to significantly increase its proposed new employment land in Policy E1(1). In addition, it explains how the Ewbank’s site is the ideal site for additional employment land, being adjacent to the currently proposed strategic employment site at Land around Burnt Common Warehouse, with the flexibility to provide a range of employment development opportunities.

2.7 In summary, this Employment Statement by Kingstons provides the following reasons why the Local Plan should provide additional employment land.

2.8 It is important that employment land allocations are spread amongst several owners, in order to ensure that there is competition between sites, and there is a mix of new employment developments serving different employment requirements.

2.9 There has been a significant loss of existing industrial sites from employment use, which will need replacement new employment floorspace within the Borough, just to maintain the existing supply. Some of these industrial sites have been of a significant size, of between 25,000 square feet and 10,000 square feet.

2.10 There is a requirement for ‘multiple sites,’ due to ‘single occupier’ take up. A single occupier, such as a major ‘on-line’ supplier, could require in the order of 150,000 square feet, which could take up the whole of the proposed new employment land in one development. This is clearly not a sustainable position, and certainly is not allowing for continuing new employment development throughout the plan period.

2.11 There is a need to provide sites of different ‘shapes,’ which will provide opportunities for small industrial and storage units over the plan period. The Ewbank’s site provides such flexibility.

2.12 One of the important evidence-base reasons for the need for additional new employment land is the significant demand from existing businesses in the Borough, with well over 50% planning to expand their operations.

2.13 Recent evidence of ‘take up’ of new employment land is significant, and the existing strategic employment sites have very little capacity for new employment development. This is clearly demonstrated in the Guildford Borough Employment Land Needs Assessment, which contains a Schedule of all the Strategic Employment Sites in the Borough. It shows that a vast majority of these sites have no potential over and above existing permissions for new employment development.

2.14 In the light of this evidence, we submit that for this Local Plan to be ‘sound’ in relation to new employment land, the proposed new employment floorspace in Policy E1(1) should be significantly increased. The addition of the Ewbank’s site of 3.49 hectares to the proposed Strategic Employment Site at Land around Burnt Common Warehouse would make a
significant contribution to the required additional employment land, to ensure that sufficient land for B1(c), B2 and B8 uses is available throughout the period of the Local Plan.

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

Attached documents:

Comment ID: PSLPP16/8831  Respondent: 11071553 / Nicholas Roberts  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY E1 (EMPLOYMENT) – I object to this policy which seems to be based on shaky and obsolete (pre-referendum) data. We don’t need to encourage low value-added jobs that should go to parts of the country where unemployment is a bigger problem. There’s a lot too much about warehouses, which take up too much space and are not appropriate for Guildford. There’s nothing to protect the rural environment on which many rural businesses depend.

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

Attached documents:

Comment ID: PSLPP171/2375  Respondent: 11071553 / Nicholas Roberts  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy E1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

• The council plans for the town and employment (E1 & E2) take no account of modern trends highlighted in previous consultations. The public seem better informed than the council and its consultants about these. The council want to waste space with low-value and land-hungry enterprises, such as warehouses, that employ few people and just add to heavy traffic, ignoring Guildford’s comparative economic advantages of a well-educated labour force and location for high-value businesses, which will therefore go elsewhere. They also want to fill the town with shops, ignoring the general global trend away from town-centre shopping and the opportunity to regenerate the decaying town centre with low-cost housing, as has happened in central London. The plan fails to make any arguments for putting commercial development instead on green-field sites such as Burnt Common, which is introduced for the first time in this version of the plan without any supporting rationale.

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

Attached documents:

Comment ID: PSLPP16/12387  Respondent: 11074465 / Louise Vaughan  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY E1
I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location, remote from any facilities of any kind, and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development. The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site. The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

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

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<th>Comment ID: PSLPP16/6488</th>
<th>Respondent: 11074561 / Tim Anderson</th>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/15859  Respondent: 11098369 / Neil & Nicki Covington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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: PSLPP16/14041  Respondent: 11136993 / Elliot Machin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

The industrial space is not needed and should remain at Slyfield

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

Attached documents:

Comment ID: PSLPP16/15841  Respondent: 11150913 / Sarah Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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: PSLPP16/2014  Respondent: 11160001 / Andy Freebody  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

1. I OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment 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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Comment ID: pslp171/2384  Respondent: 11458241 / Bewley Homes  Agent: Neame Sutton Limited (David Neame)
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy E1

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

Employment Led Uplift:

2.31 The uplift suggested in the Addendum report for employment projections is also considered to be too low. This matter is being dealt with in detail by others and in this respect Bewley Homes does not wish to repeat those detailed representations here.
2.32 In short there is no sound justification for such a significant reduction in the uplift applied to the Council’s figures between the previous version of the SHMA using the 2012 population projections and the more recent 2017 addendum that uses the 2014 population projections. Guildford remains the main town in the Enterprise M3 LEP area as confirmed in both the 2016 SA and 2017 SA. It should therefore remain the case that a similar level of uplift should be applied to the 2014 population projections as was the case in the context of the 2012 based figures.

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

Attached documents:

Comment ID: PSLPP16/2476  Respondent: 14181313 / Vision for Guildford Ltd - GVG (William Stokoe)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

Walnut Tree Close and Woodbridge Meadows, in particular, should be given over to well-planned housing and the scattered light industrial provision should be relocated to an expanded Slyfield where infrastructure and communications would be better.

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

Attached documents:

Comment ID: PSLPP16/2037  Respondent: 15060321 / Wey Estates (george hamburger)  Agent: Grant Consultancy (Alastair Grant)

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

1. These representations concern land at Send Business Centre, Tannery House, Tannery Lane, Send identified under draft Policy E1 as a “Locally Significant Employment Site”. In broad terms the owner of Send Business Centre (Wey Estates Ltd) supports the allocation of their site under Policy E1. However, objections are raised for 4 separate reasons:

   ◦ Wey Estates Ltd object to the fact that significant parts of the curtilage of the site has been, for some reason, excluded from the allocation (Representations under ‘A’ below).
   ◦ In view of the importance of the site in strategic terms it should be identified as a Strategic site not a Locally Significant Employment Site (B).
   ◦ Objections are also raised in relation to the wording of Policy E1 (C)
   ◦ There is a separate objection to the wording of Policy E2 which is inconsistent with the aims of Policy E1 (D).

In the representations that follow we deal with the main aspect namely the extent of the land to be identified under Policy E1 and then deal with the status of the site within the policy and then the specific wording of the policy.

Policy E1 Sustainable Employment

A  EXTENT OF LAND AT TANNERY LANE, SEND IDENTIFIED UNDER POLICY E1
2. The Proposals Map to the Submission Local Plan appears to delineate only the footprint of the main building complex at Send Business Centre and excludes important other areas which also form part of and are intrinsically linked to the industrial complex. This is at odds with the extent of land which has always been historically associated with the curtilage of the former industrial and present business use of the site. It is also at odds with the way the extent of the vast majority of the curtilage of other allocated sites have been identified under Policy E1. It is also inconsistent with the objectives of the policy itself where the retention and regeneration of these sites is encouraged and intensification where possible will be considered to be appropriate.

3. Set out below we explain why Wey Estates Ltd seek to amend the Submission Local Plan by adjusting the boundary of the “Locally Significant Employment Site” on the Proposals Map to reflect the extent of the industrial curtilage as shown on drg no. 12.067.SITE, (Document 1) an extract of which is set out below. (We deal with the important case for identifying the site as ‘Strategic’ later in these submissions).

4. In this regard it is also relevant to take account of the definition of previously developed land found in the glossary to NPPF. In defining the meaning of ‘Previously Developed Land’, Annexe 2 defines this as:

“Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure”.

For the reasons that will become obvious when considering the close association of the subject land, its appearance, previous long standing and established use in connection to the adjoining factory complex there can be no doubt that the subject land should be recognised as falling within the curtilage of Send Business Centre and that it is vitally important that this curtilage is recognised as such through the Local Plan process to ensure the future prosperity and viability of the Send Business Centre.

[IMAGE 1]

Wey Estates Ltd seek to have the boundary of Send Business Centre amended to reflect the red line above

Historical Association of the land from forming part of the curtilage of Send Business Centre.

1. Attached to these representations are the following documents:

   • Letter from Hamburger, Director and Shareholder of Wey Estates Ltd setting out the historical association of the land and its industrial curtilage (Document 2)
   • Copy of documentation submitted as part of a planning application some 21 years ago in relation to the industrial curtilage (Document 3)
   • Representations made some 15 years ago in connection with the first Borough Local Plan also referencing the industrial curtilage of the sit (Document 4)

1. In his Statement dated 6th July 2016 (Document 2), Mr Hamburger sets out the chronology of the use of the site. It is clear from this letter that both the large hard surfaced car park and storage area opposite the main factory complex and the open storage area to the south west and rear of Cheriton have formed part of the curtilage of the industrial complex for over 55 years (since 1961) and have been continuously used as such for that period of
time. The same is true also of the ‘island’ site referred to in Mr Hamburger’s letter although Wey Estates Ltd do not seek to develop this part of the curtilage other than as open land associated with the Business Centre.

2. Hamburger’s statement is corroborated in a number of documents associated with the use of the site. An example (Document 3) is a planning application submitted some 20 or so years ago for the re-use of the factory premises where the ‘red line’ of the application embraced all the land the subject of these representations with the then Chartered Surveyors acting for the owners in their Planning Policy Assessment stated that:

“The site relates to three parcels of land comprising approximately 3.75ha (9 acres) straddling both the River Wey Navigation and Tannery Lane, Send. All three parcels form the curtilage of the industrial complex” (see para 2.01)

1. The site plan attached to the planning application clearly identifies those parcels of land referred to as being part of the curtilage of the industrial complex and is the same as those parcels the subject of these representations.

2. Similarly, the owners made representations to the council regarding the status of the industrial site during the formal objection period to the Deposit Draft Local Plan in February 1999 (which eventually emerged as the adopted Borough Local Plan in 2003). In seeking to identify the site as a ‘Major Developed Site in the Green Belt’ the representations referred to the fact that it comprises a major developed factory site that pre-dates both the Green Belt description and the town and country planning system. There is also reference that during discussions with the council there had been agreement that redevelopment would be appropriate provided the advice given in Annex C of PPG2 is taken into account. The plan attached to those representations similarly identify all the land the subject of these representations. (Document 4).

3. All these factors, particularly the first hand detailed knowledge of the site of Mr Hamburger, all point to the fact that the industrial curtilage of the site embraced all parcels of land the subject of these representations.

Analysis of the extent of the curtilage of other allocated sites have been identified under Policy E1.

1. The following other sites are identified under Policy E1, either as ‘Strategic Employment Sites’ or, as in the case of Send Business Centre, ‘Locally Significant Employment Sites’:

   • 57 and Liongate Ladymead
   • Cathedral Hill Industrial Estate
   • Guildford Business Park
   • Guildford Industrial Estate, Deacon Field
   • Henley Business Park, Normandy
   • London Square, Cross Lane
   • Merrow Lane (incl Perram Works, Bridge Park, Merrow Business Centre, SCC depot)
   • Midleton Road Industrial Estate
   • North and south of Lysons Avenue, Ash Vale
   • Quadrum Park, Peasmarsh
   • Riverway, Astolat, Weyvern at Peasmarsh
   • Slyfield Industrial Estate
   • Surrey Research Park (extended)
   • The Guildway, Portsmouth Road
   • The Pirbright Institut
   • Woodbridge Meadows
   • Woodbridge Park, Woodbridge Road
   • 31 Chertsey Street and 1-7 Stoke Road, Guildford
   • Andrew House, College Road, College House (89 and 91), Stoke House, Leapale
   • House and Bell Court, Guildford
   • 65 Woodbridge Road, Guildford
   • The Pines Trading Estate, Broad Street
   • Send Business Centre, Tannery House, Tannery Lane, Send
   • Grange Court, Tongham

1. By reference to the Proposals Maps, (despite that some are very small scale), it would appear that, bar one exception, all of the above sites are identified by reference to their curtilage rather than the ‘footprint’ of the building. (Three examples are shown below). There is no explanation given as to why Send Business Centre is
being treated differently, perhaps it is simply an oversight of the draughtsman. Nevertheless, we believe that this anomaly should be corrected and Send Business Centre be identified by reference to its curtilage as well so that there is consistency in the policy and to enable the objectives of Policy E1 be met in this case.

[IMAGE 2]

*Henley Park (above) and Riverway, Astolat, Weyvern at Peasmarsh (below) two examples of all the other Strategic Employment sites in the Green Belt which are all identified by their curtilage*

[IMAGE 3]

*Grange Court (below), an example of all the other Locally Significant Employment Sites, delineated by their curtilage*

[IMAGE 4]

*In contrast Send Business Centre (below) is identified almost exclusively by the building’s footprint ignoring its curtilage*

[IMAGE 5]

13. A clue perhaps as to why the Submission Plan has erroneously treated Send Business Centre differently is found in the Topic Paper accompanying the Submission Local Plan. Para 4.51, dealing with the Tannery Lane site says this:

> “An undeveloped 1.4ha site in the Green Belt, was identified in the Draft Local Plan to meet the identified employment need. It was proposed Send Business Centre would be expanded on to this site.”

14. Clearly the author of this document is under the mistaken impression that the land in question is “undeveloped” whereas the reality is it has always played an important open storage and hardstanding area role as part of the curtilage associated with the business complex Indeed, there are already two industrial buildings on it (see photos in Mr. Hamburger’s statement) as well as the rebuilt wharf. The comment that “Send Business Centre would be expanded on to this site” is also misleading since the lawful position is that the land is already intrinsically part of the established industrial curtilage and has been so for over 50 years. Moreover, in accordance with the definition found in NPPF (see para 4 above) the land can lawfully be described as ‘previously developed land’. There is therefore no ‘expansion’ into this area: it has always been associated with and used for industrial/business purposes in much the same way as the curtilage of the other identified business sites identified under Policy E1, some of which are illustrated in the site plans above.

15. It is also important to point out that the in relation to land much further to the west that was identified as a Potential Development Area (PDA), representations made at the time in respect of Send Business Centre were on the basis that the business complex and its curtilage should always be recognised as such in the emerging Submission Local Plan: whether or not the adjoining PDA land was to be agreed.

• 1. It is for that reason that the conclusions in the Topic Paper that:

> “This PDA is located within high sensitivity Green Belt and is therefore no longer considered appropriate. As a result, this site (ie SBC) is also no longer considered appropriate”

is based upon a misunderstanding of the site, its curtilage, and its function.

1. The curtilage of Send Business Centre is surrounded on its southern and western sides by extensive landfill sites that were previously excavated quar. Moreover, the council granted planning permission just 9 months ago for new development including two storey workshops and chandlery buildings amounting to over 7,000 sqft (approx. 620sqm) together with a hard surfaced car park for 57 cars on land immediately adjoining the western boundary of the curtilage (ref:14/P/002289, dated 9/9/2015). By no reasonable test therefore could either the curtilage or the immediately surrounding area be accurately described as “high sensitivity Green Belt”.

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Section page number: 178
Document page number: 179
1. In this regard, it is interesting to note that in considering the recent planning application for the refurbishment of the wharf at Send Business Centre (Ref: 15/P/0249) - which is located within the curtilage land - in answer to the following question on the planning application forms “Please describe the current use of the site” the answer given was “Part of the curtilage of Send Business Centre”. Following a subsequent site visit by the officers, the Head of Development Control in recommending approval of the planning application was able to advise the Planning Committee in his Report recommending approval that “There is no material change of use of the land for this application site”.

On this basis it would appear that as recently as last year the Planning Officer was of the opinion that the land forms part of the curtilage of Send Business Centre as no material change in use was proposed.

The Objectives of Policy E1 and Send Business Centre

1. There is an acknowledged lack of suitable and diverse employment sites that we believe discourages investment from new companies in the borough and encourages existing firms to relocate to other parts of the UK or overseas. Moreover, the lack of supply is hampering the aspirations of ‘start-up’ businesses. Accordingly, the Local Plan and Policy E1 through its allocations should address the need for a wide range of business and employment opportunities for current and future businesses.

1. The Employment Land Assessment (2013) concluded that the Borough’s employment needs cannot be met within existing sites and established employment areas. It concluded that provision should be made for a net additional increase in B use class floor space of between 10.5 ha (105,000 sq m) and 20 ha (200,000 sq m) to meet the Borough’s identified employment needs. Moreover, it advised that there is not enough supply of employment land to meet future growth needs and the potential capacity does not meet the lower and upper baseline requirements.

1. The Assessment also acknowledged that there is a need to provide a degree of choice and flexibility when planning for future employment needs, to ensure that the local property market can operate efficiently. The implications are that “If we do not provide enough suitable land and enough choice and flexibility, the new Local Plan may not meet the needs of the borough’s businesses. In time, this could lead to existing businesses moving out of the borough and new and small businesses, not being able to establish themselves or invest in the borough”.

1. This background work was updated by later research undertaken by Aecom and instead of expressing the need in Ha, a floor area based figure was given with a range of between 37,200sm – 47,200sqm B1 (a) and (b) sqm. In the light of this the council decided to reduce their forecast for the need for B space to be provided within the Borough. We believe that this is a wrong approach and that a more flexible approach adopted bearing in mind of the vagaries of the market, the need to provide a range of B space both in terms of size and location and the fact that this later research could not anticipate the making permanent the GPDO rights to change B1 space to residential. In the period 2013-2016, this amounted to the loss of the sizeable amount of some 12,772sqm of B1(a) space to residential. Clearly this trend will continue as more B1(a) sites come forward as leases end and opportunities for residential conversions increase thus putting pressure to provide more suitable B1 floorspace. The range of proposed floor areas given in the policy should therefore be revised upwards (a consequential change to the floorspace figures given in Policy S2 would also need to be revised).

1. Accordingly it is right to look at potential land, including those sites in the countryside to provide for sustainable development locations and provide enough employment land to meet the expected employment needs of existing and new residents. This is particularly the case where a number of established employment sites in the countryside can provide for expansion without harming countryside interests. In this regard, the earlier published ‘Issues and Options’ paper acknowledged that rural wards accounted for almost half of the new jobs created in Guildford Borough between 2002 and 2008 according to the Guildford Economic Strategy 2011 - 2031.

1. In the short term, the need for employment land may be met through the intensification and redevelopment of existing sites and the protection of employment use on key strategic sites. This relates to both urban sites and established employment sites in the countryside. However, it is acknowledged by the research undertaken by the council that this is unlikely to be sufficient in the medium to long-term and does not allow for any choice for potential occupiers or flexibility within the market. The Plan should therefore provide choice for businesses to
start up as well as supporting existing businesses to expand. It comes as no surprise to learn that para 3.35 of the previously published Local Plan Strategy and Sites Issues and Options paper advised “For all of these reasons the Local Plan needs to continue to support job creation and business in rural areas.”

1. Send Business Centre presently provides for the employment needs for a number of start-up and innovative business as well as more established companies. The site is focussing on the digital sector with a view to creating a hub to meet the demand from the unique local supply chain of companies involved in activities such as studios, video, sound & post production, apps, etc. Moreover, LEP funding in place to improve fibre infrastructure and promote innovation support at the site.

1. An important part of Send Business Centre is Tannery Studios (TS). TS is collaborating with both Enterprise M3 LEP, and Surrey Research Park based start-up incubator ‘Set Squared’ to develop TS’ facilities into a globally significant hub specialising in digital media / creative companies. Successful companies at TS will interact with locally based companies such as EA Games, thereby benefitting Guildford Borough as a whole. However, site capacity within the existing buildings will be reached shortly and there is concern that the emerging Local Plan does not reflect the LEP priority of employment in a sector that Guildford is especially strong in given ACM and ‘Tonmeister’s’ stream of talented graduates.

1. TS already has numerous innovative and expanding companies such as Lifelines Limited, a recipient of the Queens Award for Commerce; My Little Eye Productions, a music video production house; Slik Pictures, a creative start-up that recently re-located from Silicon Roundabout; Tactic Games, the sales agent of the Angry Birds game; Ben Preston, the producer for Rhianna and the Harry Potter films and Roomba, the global leader in automated vacuum technolog

1. It is for that reason the Send Business Centre is concerned about the adverse economic consequences of the decision to remove parts of its curtilage as a Locally Significant Employment Site or as a Strategic site which the company believes it should be allocated. It is impracticable to suggest that TS can operate without parking and room for controlled expansion, and is contrary to the LEP’s funding initiative to stimulate employment and will act as a block on growth as TS will have no move on accommodatio

1. The additional land within the curtilage of the Business Centre is suitable for a sensitive expansion in accordance with the requirements of Policy E1 which could create additional business space for these and similar likeminded businesses. The land is available now to meet the employment needs of the Borough and its development can proceed without significantly harming countryside or other interests. As referred to in the statement of Mr Hamburger, planning permission is already in place to carry out road improvements to Tannery Lane in the vicinity of the site.

1. This approach is fully supported in the NP. As para 28 advises:

Planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development. To promote a strong rural economy, local and neighbourhood plans should:

* support the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well-designed new buildings; (para 28)

31 Accordingly the Proposals Map should be amended to reflect the established industrial/business curtilage that has been established for more than 50 years so as to allow a planned and sensitive expansion of the site in accordance with the objectives of Policy E1 and at the same time safeguard the existing parking and essential storage facilities on site.

B Allocation of Send Business Centre as a Strategic Site

1. The Enterprise M3 Local Enterprise Partnership (LEP) acknowledges that Guildford is rated as one of the UK’s top performing non-metropolitan boroughs and is the primary employment centre in Surrey with a GVA of £3bn in 2011. It is a net contributor to the Treasury of around £2bn. Economic growth has come primarily from high
value high R&D sectors including ICT, healthcare and bioscience, satellite technology and computer games including high profile businesses Electronic Arts and Media Molecule.

1. We have referred to above that Send Business Centre is focusing on the digital sector with a view to creating a hub to meet the demand from the unique local supply chain of companies involved in activities such as studios, video, sound & post production. Its strategic importance in this field is acknowledged by the Enterprise M3 Local Enterprise Partnership where Government funding through the LEP is in place to improve, develop and expand the business opportunities at Send Business Centre.

1. Para 4.6 of the Submission Local Plan (under the heading ‘Definitions’) defines Strategically Important Sites as follows:

“The Strategic Employment Sites were identified in the Employment Land Needs Assessment (ELNA). The sites are all larger than 1.7ha and all have more than 7,000 sq m of employment floorspace, most have more than 10,000 sq m of floorspace. Together the sites make up more than 170ha of employment land and more than 580,000 sq m of employment floorspace”.

Send Business Centre extends to some 3.2ha, and comprises over 8000 sqm of B1 and R&D employment floorspace. In addition, para 4.4.3 advises that each of the Strategic Sites account for over 100 jobs. By comparison, Send Business Centre presently employs 195 people. It is therefore well above the minimum parameters for being designated as a Strategically Important Site. Moreover, it is the home of a number of innovative and expanding companies who provide employment and contribute significantly to the local and national economies.

1. Para 4.3 of the Submission Plan also states that the Council will support existing innovation networks such as the high technology clusters that are such a key part of our economy as well as supporting the wide range of other businesses in the borough. As referred to above in paras 27 & 28, Send Business Centre is one such location. Para 4.4.3 of the Submission Plan then continues:

The Corporate Plan supports the Council in playing an active role in Enterprise M3 Local Enterprise Partnership (LEP), supporting its wider objectives to ensure that our economy remains innovative, well-balanced and socially, environmentally and commercially sustainable.

1. Send Business Centre is a major recipient of The Enterprise M3 Local Enterprise Partnership (LEP) support and Government funding through the LEP. In 2013, the Enterprise M3 LEP Board decided to proceed with two projects as being recipients of a total of £8M funding, Tannery Studios which is an integral part of Send Business Centre was one of the two recipients. The allocated £1.3 million will be used to create a new purpose built 1,900 sq. m Innovation Centre at SBC that will deliver a range of bespoke facilities specifically designed to support the needs of high growth creative companies. The facilities will include three video studios, seven sound studios, one live room, 12 editing suites, 25 innovation units and five offices. Commenting on this project Geoff French, Chair of the Enterprise M3 Board, said:

“I am very pleased to announce that the Enterprise M3 Board has approved a further two projects to receive funding from our Growing Enterprise Fund. These projects are very exciting examples of what both the private and public sector are doing in the Enterprise M3 area to stimulate long-term economic growth.

In our Strategy for Growth, the LEP has identified four key priority areas – enterprise, skills, innovation and infrastructure – that we will be addressing to deliver economic growth in the Enterprise M3 area. Both of these two successful bids that we are announcing today is focused on at least one of these areas and therefore is a very worthy recipient of Growing Enterprise Fund funding.”

1. This all points to the strategic importance of Send Business Centre and reinforces the need for it to be recognised as such. ‘Strategic’ means “Relating to the identification of long-term or overall aims and interests and the means of achieving them”. In this regard the objectives of the Submission Local Plan can in part be met by allocating Send Business Centre as a Strategic Site. Not only does it provide significant floor space and jobs well in excess of the definition found at para 4.4.6 of the Plan but perhaps it is how that space has been and will be
continued to be used that justifies its inclusion as a Strategic site. For these reasons we believe that Send Business Centre should be allocated as Strategic site under Policy E1.

C THE WORDING OF POLICY E1

1. Wey Estates Ltd generally support the wording of Policy E1, but see no real reason why the Strategic Employment Areas are treated differently from Locally Significant Employment Areas in terms of the support given by the policy

1. Strategic sites are dealt with in this way:

“The seventeen designated sites that together make up the borough’s current core supply of employment land will be protected as Strategic Employment Sites and changes of use from employment to non-employment uses resisted. The retention, intensification and employment based regeneration of these sites is encouraged”

whereas Locally Significant Employment Sites are dealt with in the following manner:

“The Locally Significant Employment Sites will be protected and within these sites changes of use to non-employment uses resisted. The retention and regeneration of these sites is encouraged and intensification where possible will be considered to be appropriate”.

1. We do not believe there should be any difference between the wording; both strategic and local sites are identified as worthy of protection because of their importance to the Borough’s economy. It follows therefore that the retention, intensification and employment based regeneration of both Strategic and Local sites is encouraged. Strategic and Local sites are located in both urban and countryside locations and therefore the policy context of those locations would also have a bearing and be taken into account in considering any subsequent planning applications.

1. Accordingly, we believe that the wording for Locally Significant Employment Sites should be changed by deleting the following text:

“The Locally Significant Employment Sites will be protected and within these sites changes of use to non-employment uses resisted. The retention and regeneration of these sites is encouraged and intensification where possible will be considered to be appropriate”.

and inserting the following text:

“The Locally Significant Employment Sites will be protected and within these sites changes of use to non-employment uses resisted. The retention, intensification and employment based regeneration of these sites is encouraged”

1. Alternatively, the policy could be recast so that the above insertion applies to both Strategic and Local sites.

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

Attached documents:  
- IMAGE 1.jpg (46 KB)
- IMAGE 2.jpg (85 KB)
- IMAGE 3.jpg (82 KB)
- IMAGE 4.jpg (20 KB)
- IMAGE 5.jpg (18 KB)
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

* Industrial developments are not needed and should be kept to the ideal site of slyfield

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

Attached documents:

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**Comment ID:** PSLPP16/4757  **Respondent:** 15084897 / Save Send Action Group (Andrew Procter)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

17  POLICY E1 SUSTAINABLE EMPLOYMENT

17.1 I object to policy E1 sustainable employment

17.2 I note that there is a significant reduction of between 71% and 79% in the previous job target and resultant 79% reduction in employment space in response to the many objections lodged in 2014 against an unsubstantiated agenda for economic expansion in the last draft and based on new findings by Aecom in the latest ELNA 2015.

17.3 I have concern as to the ill-informed clustering of all B classes in terms of the clarity of market evidence required to inform effective planning and a failure to provide a clear understanding of business needs required under Section 160 of the NPPF.

17.4 I also note the dramatic reduction in assessed demand by two Employment Land Needs Assessment Reports carried out under the same terms of reference within a period of 2 years which calls into question the general reliability of the process of collection and interpretation of data in the overall forward planning process by GBC. I do not support the policy of creating a Strategic Employment site at Garlick’s Arch (A43) in the Green Belt which is completely unnecessary due to the overall decrease in demand for industrial space which could be easily accommodated at Slyfield.

17.5 I am concerned however that the research undertaken by Aecom is generally superficial and lacks sufficient detail and analysis between B1a, B1b, B1c, B2 and B8 use classes and that no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of office, research and development, light industrial, general industrial and warehousing and distribution floor space.

17.6 No proper analysis has been made of data held by GBC in respect of different B classes in terms of planning applications granted or evidence gathered by the economic development function at GBC and no robust assessment of local market demand apart from fairly brief references to freely available market research undertaken by commercial estate agents such as Lambert Smith Hampton covering a much wider area.

17.7 GBC appear to fail to appreciate the fundamental rationale of the Use Classes Order as a planning tool in terms of useful property market research or forward planning.

17.8 What we are left with is a fairly clumsy and poorly informed plan which clusters B classes without any appreciation of widely different employment impact and economic sustainability. E.g. B1 generates at least 5 times as much employment as B8.

17.9 The lack of appreciation by GBC as to the opportunity for widely different uses being generated within B class clusters defeats the whole point of proper planning of employment uses and can significantly endanger previously good planning put forward in the previous 2003 plan. E.g. the creation of a research and development park linked to the University but now has the threat of being downgraded into a general business park (see below).
17.10 Little regard has been given in the plan to the economic reality of falling demand for B2 industrial space which is clustered with other B classes almost randomly throughout the plan.

17.11 Little regard is had to the opportunity of B1b space as an opportunity for research and development which needs to be nurtured and preserved without the detrimental and confused clustering with other B classes both in terms of planning and promotion of a research hub.

17.12 I note that the past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 derived from VoA analysis and that the calculated annual floor space demand is 0.7% over the plan period up to 2033.

17.13 I support the concept of seeking increased investment in our local knowledge-based, high technology economy. This will provide well paid, creative jobs and generate the funding necessary to pay for the infrastructure and environment this sort of industry requires.

17.14 We need to distinguish between wanting to increase the added value of the economy and physical expansion, especially given the scarcity of land in Guildford. Guildford is not the place for large space hungry businesses. So I should target high added value small and medium sized enterprises rather than the headquarters of larger corporations.

17.15 We need to promote the idea of new knowledge transfer in incubator units and small premises for new start up enterprises. They need to be on the wave of innovative new technology as opposed to older established businesses.

17.16 I object to the policy of creating a Strategic Employment at Garlicks Arch (A43) in the Green Belt. The stated requirement of 7,000 sq m (B1c, B2 and B8) could easily be accommodated at the Slyfield Regeneration site of 40 ha.

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

Attached documents:

Comment ID: pslp171/698  Respondent: 15084897 / Save Send Action Group (Andrew Procter)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E1

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 change in Policy E1 sustainable employment because they have not addressed many of the 32,000 objections made to the 2016 plan.

1.2 I object to the inclusion of Send Business Centre/Tannery Studios Tannery Lane, Send in relation to proposed inset from the Green Belt because:

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

1.3 I object to the change in Policy E1 of proposed designation of Burnt Common as an Industrial Strategic Employment Site due:

- The impact on small surrounding roads will create traffic gridlock;
- The 2017 Employment Land Need Assessment shows a reduction in demand to a low of 3.7 and a high of 4.1 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Burnt Common in the Green Belt;
- The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land as shown in the Employment Land Needs Assessment 2017;
• It was deleted from the 2014 draft because of all the local objections made previously and there is no logical reason to go back on this decision:
• There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have many empty sites and industrial units:
• There are patently no exceptional circumstances in terms of demand for employment space to build on this important area of Green Belt which effectively separates existing development in Send and Ripley and prevents urban sprawl:
• It will join up existing villages and defeat the purpose of the Green Belt

1.4 I also **object** to the potential inclusion at Burnt Common of a waste management facility mentioned at the change to paragraph 4.423a which lacks sufficient detail for proper consultation and is completely inappropriate

1.5 I object to the ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 which generally is superficial and lacks sufficient detail and analysis between B1a, B1b, B1c, B2 and B8 use classes and that no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of office, research and development, light industrial, general industrial and warehousing and distribution floor space.

1.6 I object to the fact that no reliable analysis has yet been made of data held by GBC in respect of different B classes in terms of planning applications granted or evidence gathered by the economic development function at GBC and no robust assessment of local market demand apart from fairly brief references to freely available market research undertaken by commercial estate agents such as Lambert Smith Hampton covering a much wider area.

1.7 GBC in their role as a Planning Authority appear to fail to appreciate the fundamental rationale of the Use Classes Order as a planning tool in terms of procurement of useful property market research analysis or forward planning.

1.8 What we are left with is a fairly clumsy and poorly informed plan which clusters B classes without any appreciation of widely different employment impact and economic sustainability. E.g. B1 generates at least 5 times as much employment as B8.

1.9 The lack of appreciation by GBC as to the opportunity for widely different uses being generated within B class clusters defeats the whole point of proper planning of employment uses and can significantly endanger previously good planning put forward in the previous 2003 plan. E.g. the creation of a research and development park linked to the University but now has the threat of being downgraded into a general business park (see below).

1.10 Little regard has been given in the plan to the economic reality of falling demand for B2 industrial space which is clustered with other B classes almost randomly throughout the plan.

1.11 The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

1.12 38,357sqm of B1c, B2 or B8 use class is quite sufficient supply for the plan period and does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

1.13 Little regard is **still not given** to the opportunity of specific B1b space as an opportunity for research and development which needs to be nurtured and preserved without the detrimental and confused clustering with other B classes both in terms of planning and promotion of a research hub.
1.14 I support the concept of seeking increased investment in our local knowledge-based, high technology economy. This will provide well paid, creative jobs and generate the funding necessary to pay for the infrastructure and environment this sort of industry requires.

1.15 We need to distinguish between wanting to increase the added value of the economy and physical expansion, especially given the scarcity of land in Guildford. Guildford is not the place for large space hungry businesses. So I should target high added value small and medium sized enterprises rather than the headquarters of larger corporations.

1.16 We need to promote the idea of new knowledge transfer in incubator units and small premises for new start up enterprises. They need to be on the wave of innovative new technology as opposed to older established businesses.

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

Attached documents:

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Comment ID: PSLPP16/8923  Respondent: 15107297 / Ian McQuattie  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

I OBJECT TO POLICY E1 (EMPLOYMENT):

- Poor evidence base.
- Too much encouragement to low added-value employment that’s needed elsewhere in the country.
- Fails to concentrate general business activity in urban areas or business parks that have the infrastructure.
- Fails to differentiate this from appropriate rural business.
- Too much encouragement of warehousing, for which Guildford is too congested.

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

Attached documents:

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Comment ID: PSLPP16/18701  Respondent: 15145377 / WYG (S Fidgett)  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

Policy E1 Sustainable Employment

We are largely supportive of this policy which seeks to allocate land for employment floor space across the Borough, but this is not enough and reference needs to be made to early delivery due to the backlog of economic need, owing to lack of allocations/releases in recent years. A greater choice and diversity of sites is required, including those in mixed use major allocations such as that proposed at Onslow Park, which can provide a new business hub as part of a sustainable new community as part of an urban extension on a key transport route into Guildford.

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

Attached documents:
1. I object to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

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

Attached documents:

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• Business and small commercial premises are not being given the protection they require in this plan. Despite a pledge for ‘protection of commercial premises’ and ‘provision for small business units’ (E2) by GBC and the assurances of policies E3 & E5, small businesses are already finding it difficult to locate suitable spaces. GBC have already indicated its lack of consideration of these important contributors by allowing change of use of commercial units on Ranmore & West Horsley to housing or other than light industry. I support the general aims of policy E1 whilst being concerned about the location of the new spaces and the transport links to them. Perhaps a better use of some the land earmarked for housing would be to provide the help for these SMEs.

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

Attached documents:

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1. We object to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.
The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

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

Attached documents:
Please see the attached documents

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

Attached documents:  [Representations on behalf of Wey Estates Ltd.pdf](612 KB)
[Document 4.pdf](290 KB)
[Document 1.PDF](245 KB)
[Document 2.pdf](1.1 MB)

Comment ID: PSLPP16/2040  Respondent:  15233025 / Wey Estates Ltd (Michael Hamburger)  Agent: Grant Consultancy (Alastair Grant)

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

I am Michael Hamburger and have been both a director and shareholder of the companies occupying the site for over 40 years. I am now aged 72 and spent much of my childhood playing on the site and observed first-hand the industrial use and evolution of the entire site's curtilage since my childhood.

The curtilage of what is known as Send Business Centre comprises the main former works to the north of Tannery Lane of some 80,000 sq.ft of buildings, mainly open storage land to the rear and side of Cheriton; the car and truck park to the south and opposite the main factory complex and the island to the north of the works between the Canal and the New Cut; in all approximately 9 acres. (Cheriton, a dwellinghouse, is now no longer part of the industrial curtilage).

My family's business was initially a tenant of the site and first occupied the land in 1939. The freehold was purchased in 1948 during which time it had operated as a chemical grinding and milling works. This use continued for over 60 years until 2008 when our manufacturing operations moved to Teesside. Since then it has operated as, and is now known as 'Send Business Centre'.

We originally moved to Send at the outbreak of World War 2 on 5th September 1939. This relocation occurred due to an explosion and fire at our previous plant in Arbutus Street, London. The family needed a new factory site and decided on Send, at that time most of the Tannery Lane site operated as a tannery processing rabbit skins. The island section of the site's curtilage was in use from the seventeenth century up to the 1950s for lagoon settlement pits for the fleshings resulting from degreasing the rabbit skins prior to tanning.

Following our purchase of the site's freehold, we gradually closed the original tannery and turned the whole site over to the manufacture and processing of initially gum and resins to meet supply contracts with the MOD, the Admiralty and Ministry of Food. Due to war shortages, goods arrived both by lorry and barge from the London docks and were unloaded along the site's wharf for processing.

The site's current built footprint replaced the outworn wood and brick tannery buildings over a 20- year period terminating in the 1970s. Following the rebuild the site was used for processing agrochemicals such as herbicides and biocides.

The house known as 'Cheriton' was part of the site curtilage since the 1930s. Cheriton's curtilage originally extended down to the canal, but this was much reduced in size when the company decided to excavate and extend the barge dock to receive goods and facilitate barge turnarounds in the 1960s. The former curtilage of Cheriton was also needed to transport Gum Damar to and from the 'island' for processing in one of the company's industrial stills. The iron frame work of the Still is still present on the land forming part of the curtilage of the site between the River Wey Navigation canal and the New Cut (the island site). The Still was operated remotely from the rest of the buildings due to the hazardous nature of the processes as volatile solvents were used in the process.

[IMAGE 1]
The brickwork and iron structure of the 'Still' is still visible today on the island

Due to labour shortages during the War, Cheriton was used to provide lodgings for German and Italian prisoners of war working as indent labour on site. When post-war economic conditions improved in the 1970s and housing and labour became more freely available, Cheriton was occupied by our site's security guard and factory foreman as part of the 24/7 manufacturing operations but now on a much reduced curtilage. We retain ownership of the curtilage round Cheriton including the lawn and drive, to enable the new road to be built.

In 1961 the company needed additional land to expand the industrial processes and land immediately to the west of Cheriton was acquired for this purpose, primarily for open storage. Also in 1961 other land was acquired opposite (south) of the main factory complex for parking both of motor cars and the heavy commercial vehicles associated with bringing goods to and from the site. Planning permission was obtained to use this land for parking and it was hard surfaced.

[IMAGE 2]

The car park and container storage area, the permitted re-alignment of Tannery Lane runs behind the containers and car park

This part of the industrial curtilage to the south (opposite) the main factory complex of the site has been used for HGV parking as well as for open storage for pallets, chemical drums, and packing and containerised goods for the entire length of time since planning was granted back in 1961. Put simply, the site in its present use as a Business Centre and its previous use as a chemical processing mill would not have been viable without this land since it was the main parking and pallet/container storage area serving the site. The same could be said for the open storage area west of Cheriton.

In 1995 an additional small triangle of land was acquired adjacent to the car park/storage area to enable Tannery Lane to be moved to the south of the car park to improve the site's safe operation. Planning permission was applied for and granted for the realignment of Tannery Lane demonstrating the land to the south of Tannery lane was and remains part of the site's curtilage. The aerial photos below dating from over an extended period of time shows the historic use of the entire site's curtilage.

[IMAGE 3]

Note the open storage on the curtilage land west of Cheriton and the temporary structures on the same land in the photo below

[IMAGE 4]

The land acquired in 1961 west of Cheriton had its western boundary planted with cypress trees to screen the open storage and industrial operations from the village in the 1960s (see the photo immediately below showing the cypress tree screen). The road frontage was also fenced shortly after its acquisition. This part of the company's land holdings has consistently been used as part of the site's industrial and business operations to date.

[IMAGE 5]

[IMAGE 6]

Entrance to the Cheriton curtilage buildings occupied by Complete Building Solutions Ltd.

[IMAGE 7]

In the mid-1960s large areas of hardstanding and road planings were laid to enable forklift access to move pallets and redundant packaging out of the works for disposal or to be burnt on the site. This is very evident in the first of the aerial photos above. These operations, together with the periodic renewal and maintenance of the hard surfacing continued up until 2008 when the chemical grinding and milling works relocated to Teesside. The area is subject to low grade non-migratory contamination as the result of its long term continuous use for pallet storage and waste consolidation and disposal and incineration. Since 2010, this part of the site has remained in use as parking and open storage. The hardstanding also provides much needed access to the newly improved barge dock for which planning permission was
granted in 2015 to be further enlarged and improved. It also functions as a secure fire escape from the rear of the buildings.

Over the years of ownership, a wide range of planning applications have been made over the entire site's curtilage varying from a helicopter landing pad on the open storage land adjacent to Cheriton to a planning consent to realign Tannery Lane to the site southern boundary so that the entire curtilage can be operated as one unit without Tannery Lane running through the middle. This consent is still extant since the council has subsequently agreed that a lawful start on it was made. The company plans to complete the road re-alignment as soon as it has sufficient funds to do so to complete the consolidation of the site's entire 9 acre curtilage.

*It has just occurred to us that you may wish us to explicitly state that in our view the Submission Plan is unsound although that would of course be obvious from the representations we have made. I would also add that we are happy to attend and make oral submissions to the Inspector if he feels that would be helpful to him in considering the points we raise.*

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

Attached documents:

| Document 3.pdf (1.3 MB) |
| IMAGE 1.jpg (217 KB) |
| Document 4.pdf (295 KB) |
| IMAGE 2.jpg (195 KB) |
| IMAGE 7.jpg (265 KB) |
| IMAGE 3.jpg (131 KB) |
| IMAGE 4.jpg (160 KB) |
| IMAGE 5.jpg (174 KB) |
| Document 1 (3).pdf (249 KB) |
| IMAGE 6.jpg (192 KB) |

Comment ID: pslp171/900  Respondent: 15233025 / Wey Estates Ltd (Michael Hamburger)  Agent: Grant Consultancy (Alastair Grant)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E1

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

Policy E1: Meeting employment needs

We support the inclusion of Send Business Centre as a Strategic Employment Site as part of Policy E1(5) and its designation on the Policies Map.

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

Attached documents:

Comment ID: PSLPP16/1738  Respondent: 15244641 / Wesley Raynbird-Tilbury  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY E1 - Meeting employment needs

I OBJECT because -

- The evidence base is unreliable;
- There is unclear differentiation between B class uses;
- Only high value-added business uses, contributing to a modern "knowledge economy" , are desirable, not low-grade, low-employment warehousing which is also land hungry;
- Industrial and commercial businesses must be concentrated in the urban area or existing business parks (e.g. Slyfield) not in the rural environment which the infrastructure is unable to support;

"10 See footnote 3 above.

The rural environment must support micro- or high-tech businesses, agricultural industries, and tourism, and these sectors must not be damaged by general industrial development which 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: pslp171/1992  Respondent: 15245313 / C.A. Lindsay  Agent:**

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E1

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

Land for Employment Use – E1, E2

Far too much potential development land within the town centre is being allocated for retail or commercial development rather than housing. I object to this.

It is not logical. It flies against national trends. It will make the terrible traffic and movement problems and the shortage of affordable housing worse.

The Burnt Common site is not suitable for heavy industry and it is 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: PSLPP16/1806  Respondent: 15247265 / Aileen Aitcheson  Agent:**

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

1. ECONOMY POLICIES

POLICY E1: Sustainable employment
I support the general policy statements made in this policy, whilst having no opinion on the scale of the new office space and industrial land area being proposed by GBC.

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

Attached documents:

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<th>Respondent: 15247745 / Brian Aitcheson</th>
<th>Agent:</th>
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I object to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick's Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site. The proposed development of up to 7,000 sq m of either or a mix of light industrial(B1 c), general industrial (B2) and storage and distribution (B8) at Garlick's Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick's Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

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<th>Comment ID: PSLPP16/1918</th>
<th>Respondent: 15253889 / Carole Gale</th>
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</table>
6) I object to the obsession with economic growth over quality of life which will blight the areas proposed 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: PSLPP16/1934  Respondent: 15254113 / R Orchard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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Attached documents:

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Comment ID: PSLPP16/1946  Respondent: 15254785 / M.D. Vickers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

Attached documents:

Comment ID: PSLPP16/2094 Respondent: 15264001 / Robert Peake Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

Allocation A58 and Amendments to Policy E1.

3.2 E1(4) identifies the Strategic Employment Sites as making up the borough’s core supply of employment land. A sub class of Strategic Employment Sites are Industrial Strategic Employment Sites. There are 11 existing Industrial SES identified in the policy at D1(7). Industrial SES are treated as suitable for B1(c) light industrial, B2 general industrial and B8 storage and distribution.

3.3 However, paragraph 4.4.32a of the “Reasoned justification” states: “Development involving waste management facilities may be appropriate and will be directed to the Industrial Strategic Employment Sites. The Surrey Waste Plan (2006) policy CW5: Location of Waste Facilities gives priority to industrial/employment sites, particularly those in urban areas, and to any other suitable urban sites and then to sites close to urban areas and to sites easily accessible by the strategic road network. Some waste management activities fall within the industrial classes in the Use Classes Order and can be considered to be a B1c, B2 or B8 use. This is particularly the case given the increased move towards enclosing waste management activities in purpose designed buildings. However, some do not fall within specific use classes and are therefore sui generis use.”
3.4 To the existing core of employment sites is proposed the allocation (A58) an additional Industrial Strategic Employment Site at Burnt Common (Amendment 1). The proposal is for 7000 square metres of space within use classes B1(c) (light industrial), B2 General Industrial and B8 Storage and Distribution, and “with potential for further industrial floorspace to meet borough needs”. No justification or criteria are provided to explain its identification or selection but it is assumed that it is based on the existing warehouse on the site having established an employment use of the site.

3.5 The site is currently in the Green Belt and it is proposed that the GB boundary will be amended to exclude the entire site.(Amendment 2).

3.6 Policy E1(8) (as amended) states: “When developed the new employment land at Burnt Common, together with the existing employment floorspace, will be treated as Industrial Strategic Employment Land.”

3.7 These amendments taken together cause a number of specific concerns on the basis of which the Parish Council OBJECTS to the proposed amendments.

3.8 Effectively new Allocation A58 together with the changes to Policy E1 and their associated text in the reasoned justification, provides a clear basis for the provision of a new major strategic site which would be available and treated as suitable for new waste management development on a site currently in the Green Belt.

3.9 The Parish Council considers that such a use on this site would be inappropriate for the following reasons. The site would almost directly adjoin the new housing site at A43 and would be a potential “bad neighbour development”. The open ended nature of the policy which appears to provide no limit on the extent of development depending on “the borough’s needs” adds to the growing sense of alarm that the policy ground is being prepared for industrial or waste use which could have serious environmental consequences for the Parish and its community. The existence of the current warehouse on the site does not justify the intensification of industrial uses on a site of the size proposed in this rural location. Waste management uses would be particularly unwelcome. Other concerns are the lack of specific controls on traffic generation, ensuring that any such development is contingent on appropriate highway improvements (such as the new slip roads to the A3) and to ensure that heavy vehicles associated with the development are not able to access the rural road network.

3.10 If, contrary to the Parish Council’s objection, such an allocation was to proceed to adoption, the need for the protection of the landscape and countryside and local residential amenity would mean that there must be limits on height and footprint of buildings, the scale and nature of circulation and parking areas (especially HGV parking) and other infrastructure, the use of materials, advertising and signage. Lighting would need to be controlled, to prevent intrusive all night floodlighting of the site. Such is the importance of these factors that they should be written into the policy for this site allocation.

3.11 The location for a waste management facility in the countryside ought to be subject to a full sequential site analysis and suitable locations should be identified in the plan making process in an open and transparent way, considering alternative sites higher up the sequential hierarchy, rather than being designated under the guise of a standard industrial allocation.

3.12 The allocation policy should be the subject of a full sequential site assessment in accordance with the Waste Local Plan. Such facilities should be planned on a county wide basis, given their strategic importance and the County level waste authority’s responsibilities.

3.13 If, contrary to the Parish Council’s in principle objection, the allocation was to proceed to adoption, they would promote a modification to specifically rule out waste management, especially any open air or unenclosed waste management, irrespective of whether or not such waste management was to fall within Use Classes B1(c), B2 or B8. The Policy should specifically state that notwithstanding the Use Classes Order 1987, waste management uses shall be considered unsuitable uses on the A58 site and in any case, no such use shall take place on the site without specific grant of planning permission.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
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<td>I OBJECT TO POLICY E1 (EMPLOYMENT):</td>
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<tr>
<td>• Poor evidence base.</td>
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<td>• Fails to concentrate general business activity in urban areas or business parks that have the infrastructure.</td>
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Comment ID: PSLPP16/2575  Respondent: 15285121 / Audrey Boughton  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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Comment ID: PSLPP16/2590  Respondent: 15285345 / Mike Boughton  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

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

I object to policy E1 sustainable employment I note that there is a significant reduction of between 71% and 79% in the previous job target and resultant 79% reduction in employment space in response to the many objections lodged in 2014 against an unsubstantiated agenda for economic expansion in the last draft and based on new findings by Aecom in the latest ELNA 2015.I have concern as to the ill-informed clustering of all B classes in terms of the clarity of market evidence required to inform effective planning and a failure to provide a clear understanding of business needs required under Section 160 of the NPPF. I also note the dramatic reduction in assessed demand by two Employment Land Needs Assessment Reports carried out under the same terms of reference within a period of 2 years which calls into question the general reliability of the process of collection and interpretation of data in the overall forward planning process by GBC. I am concerned however that the research undertaken by Aecom is generally superficial and lacks sufficient detail and analysis between B1a, B1b, B1c, B2 and B8 use classes and that no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of office, research and development, light industrial, general industrial and warehousing and distribution floor space. No proper analysis has been made of data held by GBC in respect of different B classes in terms of planning applications granted or evidence gathered by the economic development function at GBC and no robust assessment of local market demand apart from fairly brief references to freely available market research undertaken by commercial estate agents such as Lambert Smith Hampton covering a much wider area.GBC appear to fail to appreciate the fundamental rationale of the Use Classes Order as a planning tool in terms of useful property market research or forward planning. What we are left with is a fairly clumsy and poorly informed plan which clusters B classes without any appreciation of widely different employment impact and economic sustainability. E.g. B1 generates at least 5 times as much employment as B8. The lack of appreciation as to the opportunity for widely different uses being generated within B class clusters defeats the whole point of proper planning of employment uses and can significantly endanger previously good planning put forward in the previous 2003 plan. E.g. the creation of a research and development park linked to the University but now has the threat of being downgraded into a general business park (see
Little regard has been given in the plan to the economic reality of falling demand for B2 industrial space which is clustered with other B classes almost randomly throughout the plan. Little regard is given to the opportunity of B1 space as an opportunity for research and development which needs to be nurtured and preserved without the detrimental and confused clustering with other B classes both in terms of planning and promotion of a research hub. I note that the past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 derived from VOA analysis and that the calculated annual floor space demand is 0.7% over the plan period up to 2033. I support the concept of seeking increased investment in our local knowledge-based, high technology economy. This will provide well paid, creative jobs and generate the funding necessary to pay for the infrastructure and environment this sort of industry requires. We need to distinguish between wanting to increase the added value of the economy and physical expansion, especially given the scarcity of land in Guildford. Guildford is not the place for large space hungry businesses. So I should target high added value small and medium sized enterprises rather than the headquarters of larger corporations.

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

Attached documents:

Comment ID: PSLPP16/2826  Respondent: 15299425 / Tim and June Yorath  Agent:

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

POLICY E1 - Meeting employment needs

We object to this policy.

1. We object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

2. The site is in any event subject to frequent flooding and unsuitable for development.

3. We object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3

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

Attached documents:

Comment ID: PSLPP16/2855  Respondent: 15300385 / Mark Harding  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 sustainable employment policy (Policy E1)
If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

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

Attached documents:

Comment ID: PSLPP16/2856  Respondent: 15300385 / Mark Harding  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:

Comment ID: PSLPP16/2871  Respondent: 15301089 / Brian Yeomans  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy E1: Sustainable employment

I OBJECT to this policy

- the evidence base is unreliable
- there is unclear differentiation between B class uses
- only high added-value business uses are desirable, not low grade, low employment warehousing which is land hungry
- industrial and commercial businesses must be concentrated in the urban area, or existing business parks (eg Slyfield) not in the rural environment which the infrastructure is unable to support
- the rural environment must support micro or high tech businesses, agricultural industries, and tourism, and these sectors must not be damaged by general industrial development which is inappropriate.
### Comment ID: PSLPP16/2945  Respondent: 15304897 / Richard Baker  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

1. I OBJECT to the sustainable employment policy (Policy E1)

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

Attached documents:

### Comment ID: PSLPP16/2979  Respondent: 15304929 / Rosemary Wood  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

I OBJECT to the sustainable employment policy.

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick's Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. His unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development. If developed, the new employment site at Garlick's Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

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Attached documents:

Comment ID: PSLPP16/3444  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 E1 - Meeting employment needs

- The evidence base is unreliable;
- There is unclear differentiation between B class uses;
- Only high value-added business uses, contributing to a modern “knowledge economy”, are desirable, not low-
grade, low-employment warehousing which is also land hungry;
- Industrial and commercial businesses must be concentrated in the urban area or existing business parks (e.g.
Slyfield) not in the rural environment which the infrastructure is unable to support
- The rural environment must support micro- or high-tech businesses, agricultural industries, and tourism, and
these sectors must not be damaged by general industrial development which is inappropriate.

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

Attached documents:

Comment ID: PSLPP16/3150  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 support the general policy statements made in this policy, whilst having no opinion on the scale of the new office space
and industrial land area being proposed by GBC.

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

Attached documents:

Comment ID: PSLPP16/3313  Respondent:  15327905 / Julia Cook   Agent:

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

POLICY E1 - Meeting employment needs
I OBJECT because:

- The evidence base is unreliable;
- There is unclear differentiation between B class uses;
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- Industrial and commercial businesses must be concentrated in the urban area or existing business parks (e.g. Slyfield) not in the rural environment which the infrastructure is unable to support;
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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: PSLPP16/3784  Respondent: 15348033 / Peter Nicholas  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1  
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: PSLPP16/3882  Respondent: 15349281 / Steve Aptel  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1  
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:
Where will the new residents work? Is there employment vacancies in the area? Does it mean more people have to commute to London, will there be capacity on the rail network?

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

Attached documents:

Comment ID: PSLPP16/4158  Respondent: 15356801 / Clare Harlow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

5. I OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

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

Attached documents:

Comment ID: PSLPP16/4324  Respondent: 15359905 / John Burns  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

Policies E1,E2,E5: I object to.

The first two fly in the face of the fact that a Brown Field site already exists to the south of Burnt Common, yet the GB site is recommended to be used for a mix of warehousing, light industrial and general industrial for sustainable employment, next to what is also proposed as a residential site? The latter is still not necessary IMO and it follows that the former is not either; why? Because it can be housed along with over 100 houses if necessary, on the BF site referred to above. So why create an unnecessary strategic employment site on GB, when a BF site exists nearby to accommodate this growth?

It has to be noted further, that the development of Garlick’s Arch would result in the loss of 4 established businesses employing dozens of local people; so IMO this policy is not working in this instance, it is destructive and wasteful as opposed to economic and productive. This is a direct contradiction of the aim of policy E1; again bizarre?

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

Attached documents:
1. POLICY E1

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

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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:** PSLPP16/4535  **Respondent:** 15368993 / Tessa Spink  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

1. **POLICY E1**

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

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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: PSLPP16/4600  Respondent: 15370497 / Edward Scott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

5. I object to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick's Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

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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: PSLPP16/4611  Respondent: 15370593 / A Gee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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:

<table>
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<tr>
<th>Comment ID: PSLPP16/4817</th>
<th>Respondent: 15377953 / cctvtraining.com ltd (Gordon Tyerman)</th>
<th>Agent:</th>
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POLICY E1 Meeting employment needs

GROUNDS FOR OBJECTION

- the evidence base is unreliable
- there is unclear differentiation between B class uses
- only high added-value business uses are desirable, not low grade, low employment warehousing which is land hungry
- industrial and commercial businesses must be concentrated in the urban area, or existing business parks (eg Slyfield) not in the rural environment which the infrastructure is unable to support
• the rural environment must support micro or high tech businesses, agricultural industries, and tourism, and these sectors must not be damaged by general industrial development which is inappropriate

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

Attached documents:

Comment ID: PSLPP16/4849  Respondent: 15379969 / Teresa Britton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1
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: PSLPP16/4931  Respondent: 15381089 / Tim Poyntz  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1
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<th>Comment ID: PSLPP16/4956</th>
<th>Respondent: 15381249 / Helen Poyntz</th>
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Comment ID: PSLPP16/5009  Respondent: 15382529 / Reuben Lee  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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Attached documents:

Comment ID: PSLPP16/5129  Respondent: 15386017 / Gareth Sinnett  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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**Comment ID:** PSLPP16/5188  **Respondent:** 15388673 / Bruce Stewart  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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**Comment ID:** PSLPP16/5305  **Respondent:** 15389697 / Oliver Stewart  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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<th>Respondent: 15390785 / Francesca Molossi-Murphy</th>
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Comment ID: PSLPP16/5509  Respondent: 15399041 / Sue Ely  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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Comment ID: PSLPP16/5647  Respondent: 15405857 / Raymond Mackay  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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Attached documents:

Comment ID: PSLPP16/5699  
Respondent: 15406177 / Leonilla Frost  
Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

I OBJECT TO POLICY E1 & E3 (Employment)  
- Too much encouragement to low added-value employment that is needed elsewhere  
- Does not differentiate this from appropriate rural business

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

Attached documents:

Comment ID: PSLPP16/5708  
Respondent: 15406529 / David I Allan  
Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1  
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Comment ID: PSLPP16/5894  Respondent: 15408513 / Brian Rawling  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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Comment ID: PSLPP16/5998  Respondent: 15420833 / Marjorie Moss  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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**Comment ID:** PSLPP16/6042  **Respondent:** 15422145 / Orlando Lee  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

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

Attached documents:

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**Comment ID:** PSLPP16/16848  **Respondent:** 15422145 / Orlando Lee  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

I OBJECT to the sustainable employment policy (Policy E1)
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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: PSLPP16/6057  Respondent: 15422529 / David Roberts  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

1. POLICY E1

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

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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: PSLPP16/6126  Respondent: 15424865 / Robert Victor Ewen  Agent:
I OBJECT to the sustainable employment policy.

If developed, the new employment site at Garlick's Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick's Arch (A43) is in the scheme of industrial development relatively small.

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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:** PSLPP16/6211  **Respondent:** 15426305 / I C Dean  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

POLICY E1 - Meeting employment needs

I object to this policy.

1. I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non- sustainable location remote from any facilities of any kind and with completely inadequate public transport links. Many of the jobs will be taken by people from outside the area and it is likely all travel to and from work will be by car adding to local congestion together with the attendant commercial traffic. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support developm

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
Comment ID: PSLPP16/6212  Respondent: 15426337 / C Cope  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

I object to the sustainable employment policy (Policy E1)

Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable

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

Attached documents:

Comment ID: PSLPP16/6260  Respondent: 15427617 / Ken Scotland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

5. POLICY E1

I OBJECT to the sustainable employment policy (Policy E1).

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

Attached documents:

Comment ID: PSLPP16/6323  Respondent: 15428225 / Vian Lee  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

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If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

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

Attached documents:

Comment ID: PSLPP16/6568  Respondent: 15434241 / Valerie Sowerby  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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: PSLPP16/6617  Respondent: 15434881 / M G Waugh  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1
I also do not believe that the Council has given sufficient regard to where all these new inhabitants are going to work. There is little or no employment in these villages, there is very little bus transport, the railways are currently crammed in rush hour with no room for extra capacity and the station car parks are not big enough to cater for more cars. And yet how are people meant to get to work in Guildford, Woking and London as the primary employment centres? The answer will be by car, whether this be by way of a short journey to the station (where they will end up parking on the streets) or a full journey into Guildford (which is already rammed in rush hour). I cannot see how this can sit comfortably with the Council's Green agenda. The Council certainly will not be able to force the bus and train companies to extend their services as these are now privately owned businesses operating for profit.

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

Attached documents:
• The evidence base is unreliable;
• There is unclear differentiation between B class uses;
• Only high value-added business uses, contributing to a modern “knowledge economy”, are desirable, not low-grade, low-employment warehousing which is also land hungry;
• Industrial and commercial businesses must be concentrated in the urban area or existing business parks (e.g. Slyfield) not in the rural environment which the infrastructure is unable to support
• The rural environment must support micro- or high-tech businesses, agricultural industries, and tourism, and these sectors must not be damaged by general industrial development which is inappropriate.

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

Attached documents:

Comment ID: PSLPP16/7002  Respondent: 15442049 / Ellouise Fassom  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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: PSLPP16/7003  Respondent: 15442081 / Lauren Fassom  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the sustainable employment policy (Policy E1).

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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: PSLPP16/7225  Respondent: 15445793 / Jackie Withers  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment 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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Comment ID: PSLPP16/13073  Respondent: 15446401 / Louise Yandle  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY E1 (EMPLOYMENT):

- Poor evidence base.
- Too much encouragement to low added-value employment that’s needed elsewhere in the country.
- Fails to concentrate general business activity in urban areas or business parks that have the infrastructure.
- Fails to differentiate this from appropriate rural business.
- Too much encouragement of warehousing, for which Guildford is too congested.

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

Comment ID: PSLPP16/14367  Respondent: 15446401 / Louise Yandle  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1
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: PSLPP16/7345  Respondent: 15448193 / B. A. Howell  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to unnecessary industrial growth alongside new housing: Policies E1,E2,E5. It is hard to understand why new industrial, warehousing and storage are being proposed for an industrial strategic employment site at Garlick's Arch. There exists an acceptable Brown Field site to the south at Burnt Common which could be used for this and more; why was this removed from the Plan at very short notice and with little or no prior consultation? The use of the GB as opposed to the the latter BF site will result in the loss of dozens of long established local established jobs.

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

Attached documents:

Comment ID: PSLPP16/7378  Respondent: 15448321 / Nicole Mapplebeck  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the sustainable employment policy (Policy E1)

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Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/7380</th>
<th>Respondent: 15448385 / Edward Bates</th>
<th>Agent:</th>
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<tr>
<th>Comment ID: PSLPP16/7382</th>
<th>Respondent: 15448449 / Carol Roberts</th>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7630  Respondent: 15450817 / Audrey Gachen  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to POLICY E1 - Meeting employment needs

- The evidence base is unreliable;
- There is unclear differentiation between B class uses;
- Only high value-added business uses, contributing to a modern “knowledge economy”, are desirable, not low-grade, low-employment warehousing which is also land hungry;
- Industrial and commercial businesses must be concentrated in the urban area or existing business parks (e.g. Slyfield) not in the rural environment which the infrastructure is unable to support;
- The rural environment must support micro- or high-tech businesses, agricultural industries, and tourism, and these sectors must not be damaged by general industrial development which is inappropriate.

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

Attached documents:

Comment ID: PSLPP16/7700  Respondent: 15451457 / Camilla Bell  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1  
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7718  Respondent: 15451713 / Gaby Attwood  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

Attached documents:

Comment ID: PSLPP16/7732  Respondent: 15451905 / Jonathan Withers  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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Attached documents:

Comment ID: PSLPP16/7755  Respondent: 15451969 / Rosie Lee  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1
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Attached documents:

Comment ID: PSLPP16/7862  Respondent: 15455233 / Andrew Hamilton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7905  Respondent: 15455777 / Paul Jones  Agent:
I object to the way in which the proposed increase in demand for skilled labour in Guildford makes the plan justify the number of new homes required. The plan does not support these requirements, or at least I could not see the case. There is a lack of Commercial Properties in the area, so where are these jobs going to be created? Also the recent Brexit vote means that the numbers growth need to be scaled back.

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

Attached documents:

Contrary to national trends, too much potential development land within the town centre is being allocated for retail or commercial development rather than housing. High added value businesses are welcome in the borough, but much of the employment land is designated for retail or low added value employment floorspace, which only exacerbates current issues such as lack of low cost housing and heavy traffic. Sites such as Burnt Common Triangle, currently in the Green Belt, are inappropriate for heavy industry.

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

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Attached documents:
5. POLICY E1

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I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

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Attached documents:

Comment ID: PSLPP16/8432  Respondent: 15466177 / D.L. + E.J. Wilkinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
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I OBJECT TO POLICY E1 (EMPLOYMENT):

• Poor evidence base.
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Attached documents:

Comment ID: PSLPP16/8557  Respondent: 15470145 / Linda Eyre  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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Attached documents:

Comment ID: PSLPP16/8598  Respondent: 15472097 / Bernard Eyre  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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Attached documents:

Comment ID: PSLPP16/8663  Respondent: 15474849 / Timothy Yorath  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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Attached documents:

Comment ID: PSLPP16/8710  Respondent: 15475041 / Anne Geary  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I support the general policy statements made in this policy, whilst having no opinion on the scale of the new office space and industrial land area being proposed by GBC.

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

Attached documents:

Comment ID: PSLPP16/8728  Respondent: 15475297 / Jane Patricia Chandler  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1
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Comment ID: PSLPP16/8924  Respondent: 15478017 / Kirstie Pankhurst  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1
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Comment ID: PSLPP16/8977  Respondent: 15478177 / Michelle Brown  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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Comment ID: PSLPP16/15894  Respondent: 15478209 / Sally Daboo  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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<th>Comment ID: PSLPP16/9488</th>
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Attached documents:

Comment ID: PSLPP16/10516  Respondent: 15504001 / Margaret Banks  Agent:

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

I OBJECT to the sustainable employment policy (Policy E1)

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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:** PSLPP16/10698  **Respondent:** 15504929 / William Scott  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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**Comment ID:** PSLPP16/11251  **Respondent:** 15570145 / Owen Eszeki  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

**Policy E1 - Meeting Employment Needs**

Permitted development allows commercial properties to be converted to residential use, but at a loss of employment opportunities. I object to development of brownfield sites without some commercial activity being included, proportionate to the size of development.

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

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**Comment ID:** PSLPP16/11255  **Respondent:** 15570209 / Emily Cross  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

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<th>Comment ID: PSLPP16/15292</th>
<th>Respondent: 15570817 / Tom Edelsten</th>
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<tr>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/11824  Respondent: 15575009 / Tony Redknap  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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Attached documents:

Comment ID: PSLPP16/12047  Respondent: 15579361 / Caroline May  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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Attached documents:

Comment ID: PSLPP16/12104  Respondent: 15579649 / Peter E May  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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<th>Respondent: 15581665 / Laura Daboo</th>
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<th>Comment ID: PSLPP16/12203</th>
<th>Respondent: 15581761 / Peter Lee</th>
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Attached documents:

Comment ID: PSLPP16/12405  Respondent: 15583169 / Poul Jensen  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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Attached documents:

Comment ID: PSLPP16/12557  Respondent: 15584161 / Alexandra Elson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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Attached documents:

Comment ID: PSLPP16/12637  Respondent: 15584833 / Maria Fort  Agent:

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Attached documents:

Comment ID: PSLPP16/12653  Respondent: 15584961 / Helen Meredith  Agent:
1. POLICY E1

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Attached documents:

Comment ID: PSLPP16/12929  Respondent: 15586017 / C Maslin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

POLICY E1 SUSTAINABLE EMPLOYMENT

I object to policy E1 sustainable employment.

I note that there is a significant reduction of between 71% and 79% in the previous job target and resultant 79% reduction in employment space in response to the many objections lodged in 2014 against an unsubstantiated agenda for economic expansion in the last draft and based on new findings by Aecom in the latest ELNA 2015.

I have concern as to the ill-informed clustering of all B classes in terms of the clarity of market evidence required to inform effective planning and a failure to provide a clear understanding of business needs required under Section 160 of the NPPF.

I also note the dramatic reduction in assessed demand by two Employment Land Needs Assessment Reports carried out under the same terms of reference within a period of 2 years which calls into question the general reliability of the process of collection and interpretation of data in the overall forward planning process by GBC. I am concerned however that the research undertaken by Aecom is generally superficial and lacks sufficient detail and analysis between B1a, B1b, B1c, B2 and B8 use classes and that no reliable individual analysis has been undertaken of the widely different supply
and demand dynamics of office, research and development, light industrial, general industrial and warehousing and
distribution floor space.

No proper analysis has been made of data held by GBC in respect of different B classes in terms of planning applications
granted or evidence gathered by the economic development function at GBC and no robust assessment of local market
demand apart from fairly brief references to freely available market research undertaken by commercial estate agents
such as Lambert Smith Hampton covering a much wider area.

GBC appears to fail to appreciate the fundamental rationale of the Use Classes Order as a planning tool in terms of useful
property market research or forward planning.

What we are left with is a fairly clumsy and poorly informed plan which clusters B classes without any appreciation of
widely different employment impact and economic sustainability. E.g. B1 generates at least 5 times as much employment
as B8.

The lack of appreciation as to the opportunity for widely different uses being generated within B class clusters defeats the
whole point of proper planning of employment uses and can significantly endanger previously good planning put forward
in the previous 2003 plan. E.g. the creation of a research and development park linked to the University but now has the
threat of being downgraded into a general business park (see below).

Little regard has been given in the plan to the economic reality of falling demand for B2 industrial space which is
clustered with other B classes almost randomly throughout the plan.

Little regard is given to the opportunity of B1 b space as an opportunity for research and development which needs to be
nurtured and preserved without the detrimental and confused clustering with other B classes both in terms of planning and
promotion of a research hub.

I note that the past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 derived from VoA
analysis and that the calculated annual floor space demand is 0.7% over the plan period up to 2033.

I support the concept of seeking increased investment in our local knowledge-based, high technology economy. This will
provide well paid, creative jobs and generate the funding necessary to pay for the infrastructure and environment this sort
of industry requires.

We need to distinguish between wanting to increase the added value of the economy and physical expansion, especially
given the scarcity of land in Guildford. Guildford is not the place for large space hungry businesses. So I should target
high added value small and medium sized enterprises rather than the headquarters of larger corporations.

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

Attached documents:

Comment ID: PSLPP16/12886  Respondent: 15587105 / John Downes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

. I OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a
Strategic Employment Site.
The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

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

Attached documents:

Comment ID: PSLPP16/12903  Respondent: 15587137 / John Oliver  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy E1

My comments here would simply reiterate my earlier comments about growth. The pursuit of growth is what is drawing the additional pressures upon Guildford. There should be a reduced emphasis on growth and a greater emphasis on being the best at what we already do.

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

Attached documents:

Comment ID: PSLPP16/13019  Respondent: 15587361 / Aileen Creegan  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1
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: PSLPP16/13220  Respondent: 15588929 / Alex Hutchings  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1
POLICY E1

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

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more sustainable.

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

Attached documents:

Comment ID: PSLPP16/13461  Respondent: 15590593 / Johnathan Page  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:

Comment ID: PSLPP16/13725  Respondent: 15594817 / Toni Thompson  Agent:

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

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Thirdly is that it will make it an awful lot harder for me to get jobs as well as other younger people in Horsley, which means we will just be going elsewhere due to a lack of jobs.

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

**Attached documents:**

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**Comment ID:** PSLPP16/14056  **Respondent:** 15601057 / Chris Vinall  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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:** PSLPP16/14086  **Respondent:** 15601121 / Elspeth Anderson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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: PSLPP16/14128  Respondent: 15601217 / Patrick Barrass  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1
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:** PSLPP16/14198  **Respondent:** 15601473 / Joseph Fort  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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:** PSLPP16/14263  **Respondent:** 15601953 / Stephen Yandle  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

• Poor evidence base.
• Too much encouragement to low added-value employment that’s needed elsewhere in the country.
• Fails to concentrate general business activity in urban areas or business parks that have the infrastructure.
• Fails to differentiate this from appropriate rural business.
• Too much encouragement of warehousing, for which Guildford is too congested.

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

Attached documents:

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**Comment ID:** PSLPP16/14321  **Respondent:** 15602177 / Julia Hunt  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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 policy E1 sustainable employment. I note that there is a significant reduction of between 71% and 79% in the previous job target and resultant 79% reduction in employment space in response to the many objections lodged in 2014 against an unsubstantiated agenda for economic expansion in the last draft and based on new findings by Aecom in the latest ELNA 2015. I have concern as to the ill-informed clustering of all B classes in terms of the clarity of market evidence required to inform effective planning and a failure to provide a clear understanding of business needs required under Section 160 of the NPPF. I also note the dramatic reduction in assessed demand by two Employment Land Needs Assessment Reports carried out under the same terms of reference within a period of 2 years which calls into question the general reliability of the process of collection and interpretation of data in the overall forward planning process by GBC. I am concerned however that the research undertaken by Aecom is generally superficial and lacks sufficient detail and analysis between B1a, B1b, B1c, B2 and B8 use classes and that no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of office, research and development, light industrial, general industrial and warehousing and distribution floor space. No proper analysis has been made of data held by GBC in respect of different B classes in terms of planning applications granted or evidence gathered by the economic development function at GBC and no robust assessment of local market demand apart from fairly brief references to freely available market research undertaken by commercial estate agents such as Lambert Smith Hampton covering a much wider area. GBC appear to fail to appreciate the fundamental rationale of the Use Classes Order as a planning tool in terms of useful property market research or forward planning. What we are left with is a fairly clumsy and poorly informed plan which clusters B classes without any appreciation of widely different employment impact and economic sustainability. E.g. B1 generates at least 5 times as much employment as B8. The lack of appreciation as to the opportunity for widely different uses being generated within B class clusters defeats the whole point of proper planning of employment uses and can significantly endanger previously good planning put forward in the previous 2003 plan. E.g. the creation of a research and development park linked to the University but now has the threat of being downgraded into a general business park (see below). Little regard has been given in the plan to the economic reality of falling demand for B2 industrial space which is clustered with other B classes almost randomly throughout the plan. Little regard is given to the opportunity of B1 b space as an opportunity for research and development which needs to be nurtured and preserved without the detrimental and confused clustering with other B classes both in terms of planning and promotion of a research hub. I note that the past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 derived from VoA analysis and that the calculated annual floor space demand is 0.7% over the plan period up to 2033. I support the concept of seeking increased investment in our local knowledge-based, high technology economy. This will provide well paid, creative jobs and generate the funding necessary to pay for the infrastructure and environment this sort of industry requires. We need to distinguish between wanting to increase the added value of the economy and physical expansion, especially given the scarcity of land in Guildford. Guildford is not the place for large space hungry businesses. So I should target high added value small and medium sized enterprises rather than the headquarters of larger corporations.

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

Attached documents:
• Fails to differentiate this from appropriate rural business.

• Too much encouragement of warehousing, for which Guildford is too congested.

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

Attached documents:

Comment ID: PSLPP16/14544  Respondent: 15603489 / Simon Pitt  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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 inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

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

Attached documents:

Comment ID: PSLPP16/14659  Respondent: 15604289 / Lesley Pitt  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?
### Comment ID: PSLPP16/14806  Respondent: 15607553 / Penelope Gillmore  Agent:

#### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

**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: PSLPP16/14867  Respondent: 15608289 / Olivia Marshall  Agent:

#### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

I OBJECT to the sustainable employment policy (Policy E1).

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

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

Attached documents:
and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

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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: PSLPP16/15182  Respondent: 15610785 / Liz Vinall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

I OBJECT to the sustainable employment policy (Policy E1)

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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: PSLPP16/16558  Respondent: 15610913 / Gillian Hague  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1
I OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

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

Attached documents:
Comment ID: PSLPP16/15410  Respondent: 15614497 / Hannah Yandle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

I OBJECT TO POLICY E1 (EMPLOYMENT):
• Poor evidence base.
• Too much encouragement to low added-value employment that’s needed elsewhere in the country.
• Fails to concentrate general business activity in urban areas or business parks that have the infrastructure.
• Fails to differentiate this from appropriate rural business.
• Too much encouragement of warehousing, for which Guildford is too congested.

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

Attached documents:

Comment ID: PSLPP16/15482  Respondent: 15615745 / Nicholas Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

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

Attached documents:

Comment ID: PSLPP16/15622  Respondent: 15618305 / Lawrence Claridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

Attached documents:

Comment ID: PSLPP16/15621  Respondent: 15618337 / Matthew Pitt  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:
significantly endanger previously good planning put forward in the previous 2003 plan. E.g. the creation of a research and development park linked to the University but now has the threat of being downgraded into a general business park (see below). Little regard has been given in the plan to the economic reality of falling demand for B2 industrial space which is clustered with other B classes almost randomly throughout the plan. Little regard is given to the opportunity of B1 space as an opportunity for research and development which needs to be nurtured and preserved without the detrimental and confused clustering with other B classes both in terms of planning and promotion of a research hub. I note that the past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 derived from VoA analysis and that the calculated annual floor space demand is 0.7% over the plan period up to 2033. I support the concept of seeking increased investment in our local knowledge-based, high technology economy. This will provide well paid, creative jobs and generate the funding necessary to pay for the infrastructure and environment this sort of industry requires. We need to distinguish between wanting to increase the added value of the economy and physical expansion, especially given the scarcity of land in Guildford. Guildford is not the place for large space hungry businesses. So I should target high added value small and medium sized enterprises rather than the headquarters of larger corporations.

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

Attached documents:

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Comment ID: PSLPP16/15798  Respondent: 15624577 / Alec Marshall  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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:
We support the introduction to the economy policies which succinctly set out the role of Guildford’s economy and note that it continues to perform well but there are signs that it could lose its competitiveness to other locations. This section clearly sets out the role of the university and the research park. In our comments on the draft Local Plan (July 2014) we stated that it would be helpful if the supporting text were to include more detailed explanation of what the LEP is and how it operates, that the reference to the role of Guildford as a Growth Town in the LEP’s Strategic Economic Plan could be expanded and that the submission version of the Plan could contain information about the recent Growth Deal projects for the area. We feel that the supporting text should be expanded to include reference to these points.

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

Attached documents:

I OBJECT TO POLICY E1 (EMPLOYMENT): • Poor evidence base. • Too much encouragement to low added-value employment that’s needed elsewhere in the country. • Fails to concentrate general business activity in urban areas or
business parks that have the infrastructure. • Fails to differentiate this from appropriate rural business. • Too much encouragement of warehousing, for which Guildford is too congested.

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

Attached documents:

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Comment ID: PSLPP16/16356  Respondent: 15641281 / Paula Redmond  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

I object to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment 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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Comment ID: PSLPP16/16769  Respondent: 15650369 / Stephanie Dean  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

POLICY E1 - Meeting employment needs

I object to this policy for the following reasons.

1. I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.
1. The site is in any event subject to frequent flooding and contains ancient woodland and is unsuitable for development.

1. **I object** to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3, an area which already sees severe congestion at both ends of the working day, often tripling journey times through 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:** PSLPP16/16800  **Respondent:** 15652833 / Don Babington  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

**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:** PSLPP16/16940  **Respondent:** 15658145 / Waverley Borough Council (Elizabeth Sims)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

Policy E1 - Meeting Employment Needs and E2 - Locations of New Employment Floorspace

Guildford has an important economic role in the region which influences Waverley's economy in terms of the provision of jobs for Waverley residents and the strong commercial links with businesses in our Borough. It is therefore important to Waverley that the Guildford Local Plan maintains this role by delivering the employment floorspace and land demonstrated as needed in the Guildford Employment Land Needs Assessment (ELNA).
Policy E1 states that Guildford will provide for an additional 3,200 additional B Class jobs to be delivered through the allocation of between 37,000 and 47,000 sq m of B1a/b floorspace and between 4.7 and 5.3 hectares of industrial (B1c, B2 and B8) land which is the need identified in Guildford's recent Employment Land Needs Assessment (ELNA) and as such we have no objection to this.

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

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Policy E1 – It is noted that as a result of updated evidence on Employment Land Needs, the amount of Classes B1 a and b floorspace and Classes B1c, B2 and B8 land have been reduced, although the number of jobs to be created has been increased from 3,200 to 4,100. We are unclear how such a large increase in jobs is to be achieved whilst reducing the amount of land allocated, but we presume that this is due to higher job/floorspace densities as a result of technological innovation. It would be helpful if this could be explained.

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

Attached documents:

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Retail/Employment

Guildford is within commuting distance of MVDC by both car and train. Seeking to create strategic employment sites may be beneficial to Mole Valley residents as it would offer wider employment opportunities.

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

Attached documents:

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Economic Policies: I am in support of Policy El "Sustainable employment" but believe that Policy E2 "Location for new employment floorspace" fails to realise that Guildford Town Centre is relatively insignificant in economic value added terms. The University Quarter provides three times as much economic gross value added as the Town Centre yet is prejudiced by this policy. I am supportive of Policy E4 "Surrey Research Park", Policy ES "Rural Economy" and Policy
E6 “The leisure and visitor experience” but caution that Policy E7 “Guildford Town Centre” could lead to overdevelopment of the Town Centre.

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

Attached documents:

Comment ID: PSLPP16/17603  Respondent: 15688481 / Sally Lescher  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

I object to policy E1 sustainable employment

I note that there is a significant reduction of between 71% and 79% in the previous job target and resultant 79% reduction in employment space in response to the many objections lodged in 2014 against an unsubstantiated agenda for economic expansion in the last draft and based on new findings by Aecom in the latest ELNA 2015.

I have concern as to the ill-informed clustering of all B classes in terms of the clarity of market evidence required to inform effective planning and a failure to provide a clear understanding of business needs required under Section 160 of the NPPF.

I also note the dramatic reduction in assessed demand by two Employment Land Needs Assessment Reports carried out under the same terms of reference within a period of 2 years which calls into question the general reliability of the process of collection and interpretation of data in the overall forward planning process by GBC. I am concerned however that the research undertaken by Aecom is generally superficial and lacks sufficient detail and analysis between B1a, B1b, B1c, B2 and B8 use classes and that no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of office, research and development, light industrial, general industrial and warehousing and distribution floor space.

No proper analysis has been made of data held by GBC in respect of different B classes in terms of planning applications granted or evidence gathered by the economic development function at GBC and no robust assessment of local market demand apart from fairly brief references to freely available market research undertaken by commercial estate agents such as Lambert Smith Hampton covering a much wider area.

GBC appear to fail to appreciate the fundamental rationale of the Use Classes Order as a planning tool in terms of useful property market research or forward planning.

What we are left with is a fairly clumsy and poorly informed plan which clusters B classes without any appreciation of widely different employment impact and economic sustainability. E.g. B1 generates at least 5 times as much employment as B8.

The lack of appreciation as to the opportunity for widely different uses being generated within B class clusters defeats the whole point of proper planning of employment uses and can significantly endanger previously good planning put forward in the previous 2003 plan. E.g. the creation of a research and development park linked to the University but now has the threat of being downgraded into a general business park (see below).

Little regard has been given in the plan to the economic reality of falling demand for B2 industrial space which is clustered with other B classes almost randomly throughout the plan.

Little regard is given to the opportunity of B1 b space as an opportunity for research and development which needs to be nurtured and preserved without the detrimental and confused clustering with other B classes both in terms of planning and promotion of a research hub.
I note that the past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 derived from VoA analysis and that the calculated annual floor space demand is 0.7% over the plan period up to 2033.

I support the concept of seeking increased investment in our local knowledge-based, high technology economy. This will provide well paid, creative jobs and generate the funding necessary to pay for the infrastructure and environment this sort of industry requires.

We need to distinguish between wanting to increase the added value of the economy and physical expansion, especially given the scarcity of land in Guildford. Guildford is not the place for large space hungry businesses. So I should target high added value small and medium sized enterprises rather than the headquarters of larger corporations.

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Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17677</th>
<th>Respondent: 15693153 / Zurich Assurance Ltd</th>
<th>Agent: Barton Willmore LLP</th>
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<tr>
<td>(Sinéad Morrissey)</td>
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<tr>
<td>Zurich supports GBC’s intent within Policy E1 to deliver 3,200 additional B Class jobs by 2033 and to utilise sustainable employment development patterns to achieve this.</td>
<td></td>
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<tr>
<td>Seventeen designated sites make up the borough’s core supply of employment land and have been allocated as Strategic Employment Sites. Broadford Business Park has historically been allocated as a strategic employment site. However, as has been evidenced in the Commercial Agents Report that accompanies these representations (refer to Section 11 for more detail) the location of the Site combined with the substantial refurbishment costs makes the retaining the current designation unviable in the medium to long term.</td>
<td></td>
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<tr>
<td>GBC’s strategy has identified a varied supply and range of sites situated across the borough, which are tailored to meet local employment needs and retain a diverse local economy. Focusing economic growth on sustainably located sites that are in easy reach of public transport will also help achieve its strategic objective in reducing borough resident’s reliance on travel by private car.</td>
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<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17743</th>
<th>Respondent: 15699201 / Robert Griffin</th>
<th>Agent:</th>
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<td>There are already too many shop and office spaces in and around Guildford (a number of which are empty or not filled to capacity) so any proposal to build more of either is senseless at this time.</td>
<td></td>
<td></td>
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I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

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Attached documents:

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Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/1246</th>
<th>Respondent: 15805601 / Guildford Greenbelt Group (Sir or madam)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy E1</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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We object to the change in Policy E1 sustainable employment because they have not addressed many of the 32,000 objections made to the 2016 plan.

We 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 openess of the Green Belt and is inappropriate.

We object to the change in Policy E1 of proposed designation of Burnt Common as an Industrial Strategic Employment Site.

- It was deleted from the 2014 draft because of all the local objections made previously and there is no logical reason to go back on this decision
- The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land as shown in the Employment Land Needs Assessment 2017
- There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have many empty sites and industrial units
- The 2017 Employment Land Need Assessment shows a reduction in demand to a low of 3.7 and a high of 4.1 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Burnt Common in the Green Belt
- There are patently no exceptional circumstances in terms of demand for employment space to build on this important area of Green Belt which effectively separates existing development in Send and Ripley and prevents urban sprawl
- The impact on small surrounding roads will create traffic gridlock
- It will join up existing villages and defeat the purpose of the Green Belt

We also object to the potential inclusion at Burnt Common of a waste management facility mentioned at the change to paragraph 4.423a which lacks sufficient detail for proper consultation and is completely inappropriate We object to the ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 which generally is superficial and lacks sufficient detail and analysis between B1a, B1b, B1c, B2 and B8 use classes and that no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of office, research and development, light industrial, general industrial and warehousing and distribution floor space.

We object to the fact that no reliable analysis has yet been made of data held by GBC in respect of different B classes in terms of planning applications granted or evidence gathered by the economic development function at GBC and no robust assessment of local market demand apart from fairly brief references to freely available market research undertaken by commercial estate agents such as Lambert Smith Hampton covering a much wider area.
GBC in their role as a Planning Authority appear to fail to appreciate the fundamental rationale of the Use Classes Order as a planning tool in terms of procurement of useful property market research analysis or forward planning.

What we are left with is a fairly clumsy and poorly informed plan which clusters B classes without any appreciation of widely different employment impact and economic sustainability. E.g. B1 generates at least 5 times as much employment as B8. The lack of appreciation by GBC as to the opportunity for widely different uses being generated within B class clusters defeats the whole point of proper planning of employment uses and can significantly endanger previously good planning put forward in the previous 2003 plan. E.g. the creation of a research and development park linked to the University but now has the threat of being downgraded into a general business park (see below). Little regard has been given in the plan to the economic reality of falling demand for B2 industrial space which is clustered with other B classes almost randomly throughout the plan.

The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.” 38,357sqm of B1c, B2 or B8 use class is quite sufficient supply for the plan period and does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potentially newly developed space e.g. the undeveloped pipeline of 38,357sqm. Little regard is still not given to the opportunity of specific B1 b space as an opportunity for research and development which needs to be nurtured and preserved without the detrimental and confused clustering with other B classes both in terms of planning and promotion of a research hub.

We support the concept of seeking increased investment in our local knowledge-based, high technology economy. This will provide well paid, creative jobs and generate the funding necessary to pay for the infrastructure and environment this sort of industry requires. We need to distinguish between wanting to increase the added value of the economy and physical expansion, especially given the scarcity of land in Guildford. Guildford is not the place for large space hungry businesses. So i should target high added value small and medium sized enterprises rather than the headquarters of larger corporations. We need to promote the idea of new knowledge transfer in incubator units and small premises for new start up enterprises. They need to be on the wave of innovative new technology as opposed to older established businesses.

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

**Attached documents:**

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**Comment ID:** PSLPP16/17159  **Respondent:** 15806849 / Patmigan Land  **Agent:** Iceni Projects Ltd (Stuart Mills)

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

With regard to the proposed levels of employment provision in the Borough over the plan period, we support the fact that 4.7-5.3 hectares of industrial land will be delivered in order to meet the need identified by the 2015 Guildford Borough Employment Land Needs Assessment. We also support the strategy referred to within Policy E1 to deliver new employment floorspace in Send Marsh/ Burnt Common, as the village represents a sustainable location adjacent to the A3, which provides convenient access to other settlements in the Borough and beyond. The provision of additional employment floorspace in this broad area will assist in delivering a sustainable mixed community, locating employment opportunities in close proximity to residents and reducing the need to travel, whilst also boosting the economy of the rural area. This employment floorspace could potentially be provided on the allocation at Garlick’s Arch, as referred to in the policy, subject to further masterplanning work and consideration as to which site within the inset of the village would be most appropriate to accommodate this development.
We would however encourage the Council to reconsider the wording of the policy that specifically refers to the delivery of employment development at Garlick’s Arch being treated as a ‘Strategic Employment Site’. This would appear illogical, given that paragraph 4.4.6 defines Strategic Employment Sites as comprising more than 7,000 sq. m of employment floorspace (with most existing Strategic Employment Sites having more than 10,000 sq. m of floorspace). Conversely, the proposed employment provision at Garlick’s Arch as set out within Policy A43 comprises “up to 7,000 sq. m” of employment floorspace, which even at the upper end, would clearly be below the threshold for Strategic Employment Sites. Furthermore, we would encourage the Council to ensure that sufficient flexibility is built into the policy consistent with the NPPF. Whilst we support the provision of employment floorspace at Send Marsh/ Burnt Common, and consider that the land at Garlick’s Arch could make a welcome contribution towards the Borough’s employment needs sufficient flexibility needs to be built in to allow for 2 scenarios. Firstly (a) if additional employment provision were to be made elsewhere within the inset of the village, and/or (b) a lower level than the maximum quoted 7,000 sq. m of employment floorspace were to be delivered (subject to appropriate masterplanning and further detailed consideration of site constraints) on the Garlick’s Arch allocation in, the existing wording in Policy E1 which makes specific reference to the land at Garlick’s Arch would no longer be relevant or justified.

Having regard to the above, in order to ensure the policy is sufficiently flexible and is consistent with the definition of Strategic Employment Sites set out within the supporting text, we consider that it is important and necessary to retain the ‘up to 7,000 sq. m’ edit and to delete the reference to the new employment site at Garlick’s Arch being treated as a ‘Strategic Employment Site’. This amendment will ensure that the policy is justified and sufficiently flexible to adapt to suitable alternative options.

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

Attached documents:

Comment ID: pslp171/1828  Respondent: 15806849 / Ptarmigan Land  Agent: Iceni Projects Ltd (Charlotte Ryan-Elliott)

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

3.23 We note that the current consultation document includes updated figures for the employment requirements for B1(a)/B1(b) and B1(c)/B2/B8 uses over the plan period, with a reduction in the quantum of floorspace being planned for in both categories. However, this would appear to be consistent with the findings of the latest (2017) Employment Land Needs Assessment, and as such we broadly support the fact that the Council is apparently seeking to meet identified needs in this regard.

3.24 Furthermore, the latest version of Policy E1 no longer includes reference to employment uses at the land at Garlick’s Arch, and instead includes a general reference to employment land at Burnt Common. As discussed in our representations on the previous (June 2016) version of the Local Plan, we consider that the employment floorspace required in Send Marsh/ Burnt Common could potentially be provided on the allocation at Garlick’s Arch (site A43). Whilst the Council’s June 2017 Housing Delivery Topic Paper suggests that some concerns had been raised regarding the compatibility of employment uses with the proposed residential dwellings, we are not aware of any technical reason based on evidence as to why an employment use could not be acceptably accommodated within our client’s site with appropriate masterplanning and mitigation measures where necessary. The proposed amendment inevitably frees up approximately 2 hectares of land previously allocated for employment purposes at Garlick’s Arch, and whilst this could also be appropriate for additional housing or indeed a compatible use such as a Care Home, as part of the allocation set out at Policy A43, as discussed further below, should additional land be required in Send Marsh/ Burnt Common for employment uses, we consider that our client’s site would be suitable and available to accommodate this need.

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<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15569</th>
<th>Respondent: 15977889 / Charles Kimpton</th>
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OBJECT. To land hungry warehousing, B class uses need clarification.

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Contrary to national trends, too much potential development land within the town centre is being allocated for retail or commercial development rather than housing.

High added value businesses are welcome in the borough, but much of the employment land is designated for retail or low added value employment floorspace, which only exacerbates current issues such as lack of low cost housing and heavy traffic.

Sites such as the Burnt Common Triangle, currently in the Green Belt, are inappropriate for heavy industry.

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

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<tr>
<th>Comment ID: pslp171/167</th>
<th>Respondent: 17240193 / Anita Aptel</th>
<th>Agent:</th>
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Attached documents:

Comment ID: pslp171/735  Respondent: 17303553 / Anita Fitchie  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy E1

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 inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

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Proposed Submission Local Plan: strategy and sites 2017 - Guildford Borough Council Planning Policy Consultations

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Attached documents:

Comment ID: pslp171/766  Respondent: 17303713 / Andrew Fitchie  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy E1

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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: pslp171/1178  Respondent: 17343361 / Zurich Assurance Limited  Agent: Barton Willmore LLP (Gary Stevens)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E1

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

Refer to the attached reports for evidence why designating Broadford Business Park as a Locally Significant Employment Site is unviable and unsustainable in the medium to long term, thereby meaning that the scope of this policy cannot be delivered. As a result, this policy has not been 'positively prepared', 'justified', 'effective' or 'consistent with national policy' as required by paragraph 182 of the NPPF and associated national guidance.

[text of attachment reproduced below]

Policy context

4.1 Paragraph 17 of the NPPF sets out core land-use planning principles that should underpin both plan-making and decision-taking. It requires Local Planning Authorities to:

“Objectively identify and then meet… business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prises and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their areas, taking account of the needs of the residential and business communities.”
4.2 Local Planning Authorities should seek to address the quantity of economic development floorspace needed based on qualitative assessments of each market segment. Assessing development needs should be proportionate and consider only those future scenarios that could be reasonably expected to occur (Paragraph 003, PPG)[11].

4.3 In establishing the Functional Economic Market Area (FEMA) from which a local planning authority should use to determine the employment land needs for a specified area, paragraph 012 of the PPG[12] refers to the following factors that should be taken into account:

“The geography of commercial property markets should be thought of in terms of the requirements of the market in terms of the location of premises, and the spatial factors used in analysing demand and supply – often referred to as the functional economic market area. Since patterns of economic activity vary from place to place, there is no standard approach to defining a functional economic market area, however, it is possible to define them taking account of factors including:

• extent of any Local Enterprise Partnership within the area;
• travel to work areas;
• housing market area;
• flow of goods, services and information within the local economy;
• service market for consumers;
• administrative area;
• Catchment areas of facilities providing cultural and social well-being;
• transport network.

[12] PPG, paragraph: 012 Reference ID: 2a-012-20140306

Suggested Data Source: Office of National Statistics (travel to work areas)”.

4.4 Once the FEMA for an area has been established, which in GBC’s case includes parts of Waverley and Woking Boroughs, the paragraph 030 of the PPG[13] states that in being able to understand the current market in relation to economic and main town centre uses as well as current and future employment land needs, plan makers should:

“…should liaise closely with the business community to understand their current and potential future requirements. Plan makers should also consider:

• The recent pattern of employment land supply and loss to other uses (based on extant planning permissions and planning applications). This can be generated though a simple assessment of employment land by sub-areas and market segment, where there are distinct property market areas within authorities.
• Market intelligence (from local data and discussions with developers and property agents, recent surveys of business needs or engagement with business and economic forums).
• Market signals, such as levels and changes in rental values, and differentials between land values in different uses.
• Public information on employment land and premises required.
• Information held by other public sector bodies and utilities in relation to infrastructure constraints.
• The existing stock of employment land. This will indicate the demand for and supply of employment land and determine the likely business needs and future market requirements (though it is important to recognise that existing stock may not reflect the future needs of business). Recent statistics on take-up of sites should be consulted at this stage, along with other primary and secondary data sources to gain an understanding of the spatial implications of ‘revealed demand’ for employment land.
• The locational and premises requirements of particular types of business.
• Identification of oversupply and evidence of market failure (eg physical or ownership constraints that prevent the employment site being used effectively, which could be evidenced by unfulfilled requirements from business, yet developers are not prepared to build premises at the prevailing market rents)”.

4.5 Using this evidence, local planning authorities should identify sufficient land to satisfy current and future employment needs. Paragraph 22 of the NPPF, however, notes that:
“Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.”


4.6 Consistent with the above policy context, Zurich is able to provide up to date market intelligence to help inform GBC’s evidence base and soundness of the emerging employment related policy position set out in the GBLP.

Characteristics of Broadford Business Park

4.7 The latest version of the GBLP seeks an increased number of B Class jobs by 2034 (4,100, previously 3,200) as a result of the new Employment Land Needs Assessment (ELNA) (2017). The ELNA has also resulted in adjustments to the amount of land allocated for employment use, as set out in Table 1.

[Table 1]

4.8 Zurich supports GBC’s intent, as set out within Policy E1, to deliver new jobs across the borough and to utilise sustainable employment development patterns to achieve this. Zurich, however, strongly objects to GBC’s decision to designate Broadford Business Park as a LSES.

4.9 Paragraph 6.7 of the Briefing Note to GBC’s Borough, Economy and Infrastructure Executive Advisory Board Committee, and repeated in the agenda papers for the subsequent full Council meeting on 16 May 2017, states the reason for change in the planning policy designation is as follows:

“…we are concerned at our ability to provide sufficient and varied office floorspace. Broadford is an established business park and, whilst not sequentially preferable [our emphasis], is considered suitable given our inability to identify sufficient sequentially preferable sites. The vast majority of our office floorspace is proposed to be allocated on the extension to the Surrey Research Park – retention of Broadford will help provide a variety and mix of floorspace.”

4.10 In this statement, GBC acknowledges that Broadford Business Park is not situated in a sequentially preferable location for employment purposes. As illustrated by Table 2, extracted from Table 4-2 of the Guildford Borough Employment Land Needs Assessment (2017), the Site has numerous constraints, including (but not limited to) ‘poor’ access to public transport and ‘very poor’ access to amenities and facilities, that would hamper the ability to secure a long term employment use on the Site.

[Table 2]

4.11 GBC have acknowledged Broadford Business Park is not situated in a location that is conducive to employment uses. The buildings at Broadford Business Park have now reached the end of their economic lives, and require substantial investment to bring it up to acceptable standards or redevelop for employment use. Furthermore, the occupants of the existing development are on short term leasehold arrangements that benefit from reduced rental levels to reflect the poor condition of the existing buildings and its relatively remote location that cannot continue. Zurich are therefore concerned that proposed designation of the site as a LSES is unsustainable in the medium to long term and will simply result in vacant floor space that could otherwise be used more effectively i.e. for residential purposes.

4.12 A Commercial Viability Report (CVR) prepared by Savills, has been submitted in support of these representations to evidence the challenges in maintaining employment uses at the Site. The CVR provides an analysis of the current market conditions for the Site, the viability for a new build (employment) proposal, and, the viability of refurbishing the existing units to acceptable standards in order to demonstrate whether Broadford Business Park is sustainable employment site. The key points have been summarised below.

Market commentary
4.13 The development over time of Guildford has rendered it attractive for employers, however, the office supply and development is limited due to the historic nature of the town. This has resulted in purpose built office space to be located away from the centre of the town in business parks such as Surrey Research Park, The Astolat Business Park and Guildford Business Park. These business parks, however, possess key difference to Broadford Business Park in that they benefit from good access to the strategic road network, public transport and/or supporting services and facilities, thus making them more attractive to tenants.

4.14 The CVR notes that the majority of vacant space within a 5 mile radius of Broadford Business Park is within Guildford Town Centre (34 offices) and Godalming Town Centre (9 offices). There is approximately 220,756 sq.ft available which is approximately 28% of office stock. The 5 year average for this is 141,617 sq.ft or 18% of available stock.

4.15 The trend for any new speculative development has been to build close to good transport links with access to a large workforce rather than more isolated locations. Recent surveys and letting activity shows that demand for occupation is located heavily around transport links for staff and amenities as well as the quality of the office accommodation. Thus, take up has been more heavily centred around Guildford town centre with results now showing a 58% town centre to 42% out of town centre share. Previously these levels were at 34% town centre to 66% out of town centre share.

4.16 Consequently, occupiers are looking for modern office space either in the centre of Guildford or to the north, east or west where access to the A3 and mainline train services is more readily available. The Local Plan recognises this and states that new employment uses should have access to transport interchanges. In support of this policy, GBC’s Transport Strategy (2017), sets out several public transport improvements (such as additional rail platforms at Guildford Railway Station, increased frequency bus services and improved cycle parking facilities) as well as enhancements to the A3 trunk road.

4.17 Broadford Business Park, however, is poorly served by public transport, such that workers must rely on private modes of transport to travel to and from the Site. This is recognised by GBC’s ELNA, which rates the Site’s access to public transport as ‘poor’. The Site also lacks direct access to the A3 and the wider strategic road network.

4.18 Although the Site exhibits good quality environment and public realm characteristics, it suffers from poor access to amenities and facilities. Additional services and facilities, such as a coffee station or similar, could be introduced. This would, however, result in higher service charges or increased rent, which would end the competitive rent levels tenants currently benefit from.

4.19 Market sentiment is therefore for modern offices located in the town centres of Guildford, Godalming or the larger business park development in the borough that benefit from good transport links for staff and deliveries, and access to amenities and facilities.

**Office to residential permitted development rights**

4.20 GBC have indicated that the decision to designate the Site as an employment site was, in part, due to the loss of available office stock through office to residential permitted development right conversions. Paragraph 5.22 of the CVR notes that only 30% of the floor space assumed to be lost to such changes of use has actually taken place in the last three years and as such it is not realistic assumption that the all effected office premises would be lost to residential use.

4.21 In addition, paragraph 5.23 of the CVR notes that GBC are intending on introducing an Article 4 Direction to withdraw office to residential permitted development rights, which is likely to prevent a large number of these changes of use from being able to take place.

4.22 Zurich therefore consider that GBC have exaggerated the effect of the loss of existing office stock to residential uses.

**New build viability**

4.23 In addition to the market conditions relevant to the Site and surrounding area, the CVR includes a number of appraisals looking at possible new scheme developments for both office and industrial accommodation. The alternative
new build office scheme comprises six buildings. One option assumes 2 storeys, another 3 storeys, and a third assumes a double height single storey light industrial scheme on the same floor plates.

4.24 Whilst the appraisals for the new build schemes show that an industrial scheme would be more viable than a three storey office scheme. It is also noted that the location itself is unsuited to heavy goods vehicle activity which inevitably is the case with industrial occupiers. The narrow bridge to the west also restricts access to the A3 and the Site by larger vehicles needed to support a business park or light industrial development and is also sensitively located within close proximity to residential uses.

4.25 All of the development options that have been tested have therefore been found to unviable and would be very unlikely to attract investment from prospective developers. More intensive uses of the Site have been considered but discounted on the basis these would be unviable, there being insufficient space for the car parking levels required to offset the Site’s poor public transport and strategic infrastructure connections and that the semi-rural character of the locality is not suitable for high rise development.

**Refurbishment viability**

4.26 Several of the existing buildings and plant are reaching the end of their serviceable lives and require substantial investment in the near future to enable them to continue to be lettable commercial tenants. As a reflection of the poor condition of the buildings, current occupiers have benefitted from low rents in recent years. This arrangement is not, however, sustainable in the medium to long term.

4.27 The CVR explains that the cost of refurbishing the existing buildings up to standards commensurate with a modern office and capable of attractive interest from the local market would not be commercially viable, due to the limited rent currently secured on existing tenants and the subsequent upward pressure on rental levels being likely to render the Site uncompetitive in the market place when compared to better serviced town centre locations.

4.28 Based on the inability to justify the level of investment required to refurbish the buildings to acceptable standards, it is likely that if the currently proposed LSES designation were to be maintained the Site would become derelict. Refurbishment of the existing buildings is therefore not a viable proposition.

**Vacant possession**

4.29 Zurich will gain vacant possession of the majority of the Site by 2019, with the remaining building by 2022. As such there is a reasonable prospect that a residential development (subject to planning permission being granted) could commence from 2019 with Bishopsgate House retained in the first instance and redeveloped as a second phase.

[Table 3]

4.30 The removal of the employment designation, would therefore enable Broadford Business Park to deliver housing within the short term, thus improving GBC’s 5YHLS position, whilst bringing forward the benefits of such development and should be considered.

**Summary and conclusion**

4.31 Broadford Business Park has reached the end of its economic life, and requires significant investment in order to bring it up to acceptable standards. However, as assessed by the CRVR, and recognised by the ELNA, the Site is constrained by a number of factors including:

- Lack of direct access to the A3 and wider strategic road network;
- Poor accessibility to public transport; and
- Very poor accessibility to amenities and facilities.
4.32 These factors, which are beyond the control of Zurich, have contributed towards the low market rents achievable in this location. The rental value of the employment floorspace is further reduced its relatively poor quality. The attractiveness of Broadford Park as a business location is therefore predicated on low rents.

4.33 The buildings and associated plant at Broadford Business Park are reaching the end of their serviceable lives. Significant investment is required in order to bring them up to acceptable standards. However, the market conditions in the south of Guildford render such investments unviable.

4.34 Notwithstanding the inability to secure investment, the Site would continue to suffer from the same issues such as poor transport communication links. To offset any upgrade to the existing buildings required to maintain them at an acceptable standard, rental levels would inevitably need to increase. This would be out of step with the out of town location of the Site and would be unlikely to attract interest from prospective tenants. These factors alone would make the refurbishment or redevelopment unviable with the likely result being that the Site would become derelict.

4.35 On the basis of the above, Zurich considers Policy E1 to not be ‘positively prepared’, ‘justified’, ‘effective’ or ‘consistent with national policy’. As a result, the policy does not comply with paragraph 182 of the NPPF and is regarded as being unsound.

4.36 Zurich therefore strongly recommends that GBC removes the proposed LSES designation of Broadford Business Park.

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

Refer to the attached reports for guidance on the need to remove Broadford Business Park from the list of Locally Significant Employment Sites.

**Attached documents:**
- Commercial Viability Report July 2017 plus app.pdf (4.9 MB)
- 170724 - Broadford Business Park Reg 19 Reps (FINAL).pdf (704 KB)
3.31 Policy E1 has been revised to reflect the change in the lifetime of the Local Plan. However, as a result, the number of class B1 jobs has been increased from 3,200 to 4,100. The reason for this increase is unclear and has not been referenced within the summary of changes to the Local Plan which accompanies the document. However, in direct contradiction to this increase, the amount of floorspace allocated for these jobs has decreased from a range of 37,000-47,000 sq m to a range of 36,100 - 43,700 sq m. Again the reason for this change remains unclear and requires further clarification. GVG recognises and supports the success of the University of Surrey in supporting the formation of a series of technology based industries in the borough. The Plan should recognise the need to support this growth, both at the research park, and elsewhere in borough by the provision of appropriate accommodation.

3.32 GVG believes the allocation of the Walnut Tree Close and Woodbridge Meadows sites as employment zones is consistent with backward-looking planning but not the forward-looking Plan that GVG is seeking. If 10 Ha of employment land from both of these areas was relocated to either the Gosden Hill Farm or Blackwell Farm allocations (both to be served by the SMC and new rail stations), they would displace land for appropriate residential densities at 30-40 dwellings per hectare (DPH) giving a total of up to 400 homes. However, the area which would be created at Walnut Tree Close and Woodbridge Meadows through rezoning would be appropriate for densities of up to 200 DPH delivering up to 2,000 homes. This would deliver a net increase of 1,600 homes across the lifetime of the Plan for an equivalent land take.

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

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: pslp171/2018</th>
<th>Respondent: 17434817 / Jenny Wicks</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E1</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>

Policy E1

I object to this policy insofar as it relates to the Green Belt site at Burnt Common

The reality of demand for industrial space is that it is nationally in decline and this is evidenced in Guildford by the substantial number of planning permissions that have not been implemented (38,000 sq metres). Development, in the uncertain post-Brexit world, should certainly not be directed to a Green Belt site like Burnt Common. An extension to the Slyfield Industrial Estate would be more appropriate.

The stipulation of a ‘minimum’ area of development at Burnt Common means that this could turn into a large and intensive industrial site, quite unsuitable for its semi-rural location.

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

Attached documents:

Total records: 516.
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

Document part: Policy E2 - Locations of new employment floorspace
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

<table>
<thead>
<tr>
<th>Comment ID: pslp171/1457</th>
<th>Respondent: 8555489 / Alan Norris</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E2</td>
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Transport interchanges: (Ref Policy E2 = page 76, para 4.4.18)

I have reservations on the proposed designation of the on-street town centre bus stops (replacing the bus station) as an integrated public transport interchange. The distance between the furthest bus stops should not be more than (say) 250m - otherwise the fragmented bus stops spread across the town centre cannot really be considered as a reasonable and effective interchange. This will lead to reduced use of public transport.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/2592</th>
<th>Respondent: 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey)</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E2</td>
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</table>

4.4.15 We sustain our objection to directing development to locations within 500m of a public transport interchange while the list includes stations in residential, school and rural areas (eg London Road, Merrow (ref 4.4.16), West Horsley) unless there is clear guidance on the need to respect character and consider other impacts. We suggest these stations are moved to an expanded version of 4.4.17

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: PSLPP16/11415</th>
<th>Respondent: 8559297 / Holy Trinity Amenity Group (Robert Bromham)</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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E2. Location for new employment floorspace, P67

We are concerned that the policy is to “direct” B1b use to the town centre, and ask that this is qualified as above.

We disagree with the policy for second choice new employment sites to be within 500m of the “transport interchange” of London Road station. The station is a means of joining a train on a linear route, and it cannot be described as an interchange. The 500m radius would mainly cover an established residential area, including part of ours, which should not be converted to business use.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/1836</th>
<th>Respondent: 8561377 / The Guildford Society (Julian Lyon)</th>
<th>Agent:</th>
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</table>

kkk) We have already highlighted that Policy E2 has a sequential test that the land removed from the plan at Flexford and Normandy would have passed (E2(1)(b)). We note at 4.4.15 Wanborough Rail Station has been deleted. Sequentially, in the context of this Policy E2, development of part of the site at A47 (deleted) would be better than some of the other sites included (e.g., at Send), and we do not understand the explanation given.

III) Policy E2(1) and paragraph 4.4.14 give priority to the town centre, but this is not reflected in the site allocations. The issue of specific town centre uses is discussed in 4.4.22 but not resolved.

mmm) Policy E2(2) should continue to include reference to the Research park (Policy E4) because of its importance to the Borough and its economy.

nnn) Policy E2(1) sets the sequential approach which needs to be followed to determinewhere new office and research & development floorspace will be located. Guildford Town Centre has preference then it is given to areas within 500m of a transport interchange, and then to strategic employment sites.

ooo) Policy E2(2) has been changed to now state that the sequential approach does not apply to proposed floorspace included in the site allocations in the Local Plan.

ppp) The inclusion of this part of the policy significantly undermines the overall strategy for the provision of floorspace in the borough. The addition of this wording is in direct contradiction to the first part of the policy which directs development to the town centre. It now demonstrates that there has been little rationale to including employment space on the strategic allocations other than to meet the need specified in Policy E1.

qqq) Paragraph 4.416 within the definitions section of Policy E2 states that: “When developed, the two new rail stations, Guildford East (Merrow) and Guildford West (Park Barn), will each be treated as a transport interchange.”

rrr) Guildford West (Park Barn) as a transport interchange would, if additional land is made available for employment uses nearby, reinforce the rationale of promoting the provision of high density, residential units on Woodbridge Meadows in close proximity to the town centre.

sss) Guildford East (Merrow) station as a transport interchange would, if additional land is made available for employment uses nearby, reinforce the rationale of promoting the provision of high density, residential units on Woodbridge Meadows in close proximity to the town centre.

ttt) Whilst Woodbridge Meadows is zoned for Employment Uses in the Plan, there is no specific allocation or strategic site. This is despite a) the freeholds being in the Council’s ownership, b) significant amounts of land being vacant or underused and c) the need for a comprehensive flood protection scheme to hold water upstream of the constraint caused by the 1930s A25 Guildford Bypass southbound bridge which is low over the river.

EMPLOYMENT - TOPIC PAPER (2017)
We broadly agree with the summary of other sources in the Topic Paper.
At paragraph 4.28, Wanborough is missing from the list of stations – it should, according to the local plan, be in the second list (excluded stations), although the Guildford Society is not convinced by the arguments for removing allocation A47 from the plan whilst retaining less well-connected places in the land allocation schedule.

At paragraph 4.35, there is reference to a solitary 3,000sqm office (B1a) site in the town centre by 2034. We consider this to be a matter of planning choice rather than of fact. In adopting an approach like the Guildford Vision Group plan, it would be possible to generate significantly more office space, albeit some of it would be a like-for-like replacement of demolished buildings.

We have identified the benefits of displacing employment land at, say, Walnut Tree Close and Woodbridge Meadows to one or more of the well-connected urban extension sites.

[Image]

By allocating more employment at each of Blackwell Farm and Gosden Hill Farm proposed urban extension sites, employment uses can be relocated to sustainable locations and the vacated land used for higher density homes.

The Guildford Society was in support of the use of land to the north of Slyfield Industrial Estate (with a suitable permanent buffer and screen to Jacobs Well) for employment land (rejected in Paragraph 4.63) and also for a Park and Ride facility at the end of the Sustainable Movement Corridor which could be for commuters, shoppers and also serving a SANG at Burpham Court Farm.

We recognise the plans to retain strategic employment sites – although we were of the understanding that some parts of the Bell Court complex were in residential use.

We would like to see special, specific policies in the plan to encourage apprenticeships in areas particularly where the LSOA relative deprivation score for the subdomain ‘Young Persons Education and Skills’ is particularly poor.

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

Attached documents:
POLICY E2: Location for new employment floorspace

Under this policy, areas within 500 metres of a "public transport interchange" play a key role.

Proposals for new office and research and development floor-space are to be directed to firstly Guildford town centre and then to areas within 500 metres of a public transport interchange (PTI).

East Horsley has two railway stations, Horsley Station and Effingham Junction Station, but currently the Draft Local Plan only proposes that Horsley Station should have PTI status.

WHPC is neutral on this Policy but notes that East Horsley Parish Council has submitted detailed comments on 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)
for a fifth building at the Guildford Business Park, as this falls second in the hierarchy of sequential testing. The policy will, therefore, stagnate development.

Again under Policy E2, there is a heading "All B Class development". Encouragement will be given to business units less than 50 sq m. In reality, this is a tiny amount of accommodation and unlikely to ever be built. Consideration should be given to increasing the size of this.

Page 68 - Reasons justification

Under Clause 4.4.22, the Employment Lands Needs Assessment, concludes that there was not enough capacity to accommodate all of their growth in the town centre and on existing strategic employment sites. However, this contradicts the concept of a sequential test where, if there was a site available to be developed in the town centre, nothing outside that could be built.

Para 4.4.23 also contradicts the restrictive policy behind the sequential test, given that there is a desire to ensure that buildings are available. Whilst development in the most sustainable locations is a laudable target, we do not live in a perfect world where this can be created and flexibility within the Local Plan is an important factor.

Monitoring Indicators

Under the monitoring indicator for Bl©, B2 & BS, the target is to have 100% of permitted development on industrial strategic employment sites. This is too restrictive. Under the section for small business units, the target simply states "percentage of B Class development proposals incorporating units of less than 50 sq m". This is not actually a target as a target has to be a proposed figure.

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: PSLPP16/7795</th>
<th>Respondent: 8566529 / Derek Corden</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2</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 comments above are self-explanatory but we believe they are very restrictive.

The suggestion of a sequential test is inappropriate in a Borough where employment land is very scarce and if you lie outside the 500m boundary from a transport interchange, the ability to develop a site for a use which surely must be beneficial to the town is restricted.

We believe that the Local Plan is mismatched between theoretical definitions of land uses and the reality of what the market demands but will specifically generate employment. The examples above given on this would be medical D1 use, D2 use, and sui generis uses. To have to market a building for potentially over 2 years to create say 10 jobs, when say 50 jobs could be created tomorrow by an alternative use in the above categories, would seem not only ludicrous but also render the Borough uncompetitive and fail to provide opportunities for not only the existing residents in the Borough, but also those in the new houses that are to be developed during the planned period.

Land is being taken away from employment uses without adequate provision for their replacement and the Borough is putting all its eggs in one basket with its allocation of land at the Research Park.

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

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/3162</th>
<th>Respondent: 8568193 / Miss Edwina Attwood</th>
<th>Agent:</th>
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6.1 OBJECT to the location for new employment floor space at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floor space will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floor space to be located at Garlick’s Arch, when just to the south, at Burnt Common, there is existing industrial development, with surplus land that could accommodate further development of 7,000 sq m.

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: PSLPP16/2188</th>
<th>Respondent: 8570273 / Fiona Curtis</th>
<th>Agent: Fiona Curtis</th>
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I object to policy E2 location for new employment floor space I object to the policy of expanding the Research Park onto Blackwell Farm and I do not believe there are exceptional circumstances to justify incursion into this permanent and high quality area of Green Belt.

The Surrey Research Park currently extends to 65,000 sq m. There is already granted consent to expand to a further 9,000 sq m (14%) The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis. The ELNA 2015 calculated annual floor space demand is 0.7%. The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period. The necessary growth in floor space over the plan period is therefore 17 years x 0.7% = 11.9%. There is currently 14% expansion space already available. The proposal by GBC to expand the 65,000 sq m by 9,000 sq m (existing allocation) with an additional 35,000 sq m amounts to an increase of 67% of the Research Park which is not required.

The Research Park is currently developed at a density of 25% plot ratio. The majority of existing buildings are 2 stories giving a developed floor space plot ratio of 12.5%. The existing Research Park has the opportunity to markedly increase its density without infringing any Green Belt land nearby. Any density increase would be cost effective for the use of all existing infrastructure and would also have the potential to match the existing densities of existing academic buildings on the university campus which are three to four times higher. Together with the existing expansion of 14% through existing consents and the opportunity to increase its density the Research Park has ample capacity to expand to embrace new demand for B1b uses linked to the university.

A preferred location for increased B1a and B1b space would be in the Town Centre close to housing and a convenient transport hub.

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: pslp171/2331</th>
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</table>
4.4.23 I object to the change in policy E2 under paragraph 4.4.23a in relation to development involving waste management facilities to be directed to the Industrial Strategic Employment Sites. This fails to provide sufficient public consultation in relation to access and traffic flows. It also fails to provide sufficient public consultation in relation to unpleasant aspects of waste management. Waste sites should, in my view, not be developed near residential areas and if this is followed through, their presence will of course prevent development in the area in the future.

4.4.14 This policy omits Park and Rides as integral to linking business and transport

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

Attached documents:

Comment ID: pslip171/1694  Respondent: 8573793 / Harry Eve  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Waste management facilities are an essential feature but there should be no presumption that they can override public consultation.

The addition of 4.4.23(a) concerning waste management facilities is insufficient in itself. It should be made clear that all such facilities will be subject to full public consultation and scrutiny of their impacts.

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

Attached documents:

Comment ID: PSLPP16/18723  Respondent: 8581089 / Jenny Wicks  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy E2

I object to this policy because revision of the SHMA to take account of flaws identified in it and the post-Brexit economy will reduce the need for new employment floorspace.

I also object to the inclusion of Garlick’s Arch as a strategic employment site. It is remote from any facilities and has very poor public transport links. Employees are likely to travel by car, adding to congestion on local roads and the A3. It has been described as an ‘enabling development’ for construction of A3 slip roads, but it is not at all clear that Highways England want more junctions on the already very congested A3, or who is going to pay for the road construction.
I also object to Gosden Hill Farm being a strategic employment site. Such sites should be sited in more sustainable locations with good transport links. This proposal will lead to additional congestion in Burpham and on 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:** PSLPP16/17556  **Respondent:** 8581505 / Burpham Neighbourhood Forum (Jim Allen)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

The allocation of potential work places is an admirable aspiration.

As can be seen in Walnut Tree Close – the allocation of the land for employment and the building of the units lasted around a decade before they were demolished. Since no company has asked for new land, it is presumptuous to guess the need for work floor space, until it is asked for and type determined. It is also illogical to demolish ‘in use’ work space simply to build workers’ housing on the land. Such process destroys current jobs without creating or replacing the jobs destroyed.

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

Attached documents:

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**Comment ID:** pslp171/2197  **Respondent:** 8581505 / Burpham Neighbourhood Forum (Jim Allen)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy E2

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

4.4.14

Burnt Common/ Gosden Hill road access non-existent.

Addition: delete as it contradicts policy E1 and implies that the town centre offers most business opportunities. It adds nothing to the Plan.

Recommendation: add “subject to other policies in this plan” because this is too loosely worded at present and could lead to other uses in residential areas.

[Page 75, Policy E2, (6)]

4.4.16

Two new stations Merrow and Park Barn are not in Wessex Network Rail Plan to 2043. While one paragraph mentions that there was a ‘suggestion’ of new stations, it is ignored throughout both this and all other relevant documents concerning the railway, and can therefore only be considered Aspirational at best.

4.4.22

Estimated ground space subject to change in SHMA -
4.4.23a
Surrey waste management plan is in process of being re-written in 2018. This will be a fundamental change of waste handling as it is being contracted out by adjoining boroughs that use GBC sites during the Plan period. Thus site capacity needed throughout the Borough is subject to change in the next three years.

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)

Comment ID: PSLPP16/13957  Respondent:  8581601 / Mr James Winborn  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The designation of Horsley Station as a transport interchange also means that there is likely to be unsuitable out-of-character development.

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

Attached documents:

Comment ID: PSLPP16/12170  Respondent:  8582017 / The Clandon Society (J Wright)  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:

Comment ID: PSLPP16/13496  Respondent:  8582977 / Guildford Environment Forum (John Bannister)  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
POLICY E2

I OBJECT to the location for new employment floorspace (Policy E2)

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

Attached documents:
facilitate the delivery of new homes to help provide a local pool of economically active workforce. Moreover, this is reflective of the Enterprise M3 LEP’s Strategic Economic Plan, and the role that Guildford plays in the economic well-being of the northern part of the LEP area, within which Rushmoor also falls.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/8073</th>
<th>Respondent: 8587489 / University of Surrey (Malcolm Parry)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2</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></td>
<td>but believe that Policy E2 “Location for new employment floor space” fails to realise that Guildford Town Centre is relatively insignificant in economic value added terms. The University Quarter provides three times as much economic gross value added as the Town Centre yet is prejudiced by this policy.</td>
<td></td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
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<tr>
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<td>Attached documents:</td>
<td></td>
</tr>
</tbody>
</table>
WBDRA SUPPORTS this policy

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

Attached documents:

SUPPORT

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

Attached documents:

POLICY E2 - Location for new employment floorspace

We object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. We also oppose the policy of expanding the Research Park onto Blackwell Farm. 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:
Policy E2: Location for new employment floorspace

Response

Summary

I OBJECT to this policy as it stands. I am of the opinion that all new office and research and development (use Class B1a and B1b) floor space should be within Guildford town centre. I do not support the policy of expanding the Research Park onto Blackwell Farm and I do not believe there are exceptional circumstances to justify incursion into this permanent and high quality area of Green Belt.

Detailed response:

- The Surrey Research Park currently extends to 65,000 sq m
- There is already granted consent to expand to a further 9,000 sq m (14%)
- The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis
- The ELNA 2015 calculated annual floor space demand is 0.7%
- The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period.
- The necessary growth in floor space over the plan period is therefore 17 years x 0.7% = 11.9%
There is currently 14% expansion space already available

The proposal by GBC to expand the 65,000 sq m by 9,000 sq m (existing allocation) with an additional 35,000 sq m amounts to an increase of 67% of the Research Park which is not required

The Research Park is currently developed at a density of 25% plot ratio. The majority of existing buildings are 2 storeys giving a developed floor space plot ratio of 12.5%.

The existing Research Park has the opportunity to markedly increase its density without infringing any Green Belt land nearby. Any density increase would be cost effective for the use of all existing infrastructure and would also have the potential to match the existing densities of existing academic buildings on the university campus which are three to four times higher.

Together with the existing expansion of 14% through existing consents and the opportunity to increase its density the Research Park has ample capacity to expand to embrace new demand for B1b uses linked to the university.

A preferred location for increased B1a and B1b space should be on other existing sites close to housing and a convenient transport hub.

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

Attached documents:

Comment ID: PSLPP16/10079  Respondent: 8640353 / Julian Cranwell  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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 it stands. We are of the opinion that all new office and research and development (use Class B1a and B1b) floor space should be within Guildford town centre. We do not support the policy of expanding the Research Park onto Blackwell Farm and we do not believe there are exceptional circumstances to justify incursion into this permanent and high quality area of Green Belt.

- The Surrey Research Park currently extends to 65,000 sq m
- There is already granted consent to expand to a further 9,000 sq m (14%)
- The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis
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- The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period.
- The necessary growth in floor space over the plan period is therefore 17 years x 0.7% = 11.9%
- There is currently 14% expansion space already available
- The proposal by GBC to expand the 65,000 sq m by 9,000 sq m (existing allocation) with an additional 35,000 sq m amounts to an increase of 67% of the Research Park which is not required
- The Research Park is currently developed at a density of 25% plot ratio. The majority of existing buildings are 2 storeys giving a developed floor space plot ratio of 12.5%.
- The existing Research Park has the opportunity to markedly increase its density without infringing any Green Belt land nearby. Any density increase would be cost effective for the use of all existing infrastructure and would also have the potential to match the existing densities of existing academic buildings on the university campus which are three to four times higher.
• Together with the existing expansion of 14% through existing consents and the opportunity to increase its density the Research Park has ample capacity to expand to embrace new demand for B1b uses linked to the university.
• A preferred location for increased B1a and B1b space should be on other existing sites close to housing and a convenient transport hub

We are of the opinion that all new office and research and development (use Class B1a and B1b) floor space should be within Guildford town centre. **We object** to the policy of expanding the Research Park onto Blackwell Farm and we do not believe there are exceptional circumstances to justify incursion into this permanent and high quality area of 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 E2

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:

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Comment ID: PSLPP16/5043  Respondent: 8667713 / Victoria Sinnett  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

6. POLICY E2

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I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt. Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

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

Attached documents:

Comment ID: PSLPP16/1403  Respondent: 8671969 / Valerie Thompson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

E2 Location of new offices
I object to new offices being built, other than those commissioned, rather than speculative building. There are many empty offices at present.

Any buildings allowed should be placed in urban areas eg. Guildford Town centre, rather than in rural locations.

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

Attached documents:

Comment ID: pslp171/1088  Respondent:  8687041 / Michael Aaronson  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy E2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I support the clear statement in para 4.4.17 that for the purposes of the sequential assessment the train station at Wanborough will not be considered to be a transport interchange because of its location within the Green Belt, and that it is not considered appropriate to direct office development over 100 sq m to this location. The weight that this station was made to carry in the 2016 version of the Plan, and its use to help justify the entirely developer-led Site A46, was completely inappropriate.

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

Attached documents:

Comment ID: PSLPP16/1075  Respondent:  8687265 / Dagero Ltd (David Roberts)  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY E2 - Location for new employment floorspace

I OBJECT. It would be more sensible to confine all new office and research and development (use Class B1a and B1b) floor space to Guildford town centre. I oppose the policy of expanding the Research Park onto Blackwell Farm (see my reference to “regulatory capture” of local public policy by the University, Policy H1, above). 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: PSLPP16/4499  Respondent:  8709249 / Geoff Spink  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
I object to POLICY E2 - Location for new employment floorspace

- It would be more sensible to confine all new office and research and development (use Class B1a and B1b) floor space to Guildford town centre.
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3499  Respondent: 8726529 / Eric Palmer  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:

Comment ID: PSLPP16/9459  Respondent: 8728865 / Neville Bryan  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Object

I do not support the policy of expanding the Research Park onto Blackwell Farm which is high quality Greenbelt and which has recently been identified as of sufficient quality to be included in the Surrey Hills AONB review (see the Land Management Services independent report commissioned by Worplesdon, Compton and Wanborough PC’s - June 2016 in Policy A26).

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

Attached documents:

Comment ID: pslp171/2055  Respondent: 8729217 / Karen Stevens  Agent:
I object to the change to policy E2 (2), which will direct new office floor space to areas such as the Surrey Research Park, which are less sustainable than the town centre in terms of traffic movements. This policy contradicts the statement in para 4.4.14 that: “Guildford town centre is the preferred location for new office and research & development floorspace due to its size and transport links.”

There is no evidence to suggest that businesses prefer out-of-town locations, in fact the Employment Land Needs Assessment (ELNA), 2016, suggests the opposite is the case:

“Where sites are available the Council could seek to encourage office/R&D development in town centres. The town centre is a more sustainable location and there is evidence of demand from potential occupiers which currently do not necessarily have town centre offices that match their needs.” (ELNA, 2016, 7.3.2)

Furthermore, out-of-town development (whether a business park or a retail centre) is inefficient use of land due to it being used only during office hours and, in the case of the Research Park, with many acres of surface car parks (formerly working farmland) serving no use outside office hours.

[Figure 5] – One New Change, opposite St Paul’s Cathedral shows how it is possible to make efficient use of space available. On a plot of just 1.1 hectares it provides nearly 50% more floor space than the whole of the 27 hectare Research Park and does so with just 7 storeys above ground (and 3 below). Guildford should be exploring similar ideas for its employment land usage.

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)
**Comment ID:** PSLPP16/13923  **Respondent:** 8732993 / Michael Weber  **Agent:**  

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2  

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

**POLICY E2**  

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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: PSLPP16/3915  
Respondent: 8744161 / Michael Bridge  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

1. I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

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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: PSLPP16/3937  
Respondent: 8744257 / Mary E Bridge  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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: PSLPP16/9285  Respondent: 8744417 / Mark & Gillie Hammersley  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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: PSLPP16/12304  Respondent: 8749473 / Charlotte Beckett  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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: PSLPP16/8583  Respondent: 8751105 / Amanda Harris  Agent: |
|-----------------------------|---------------------------------|
| **Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2 |
| **Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )** |

1. **I OBJECT** to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

**Attached documents:**

| Comment ID: PSLPP16/12534  Respondent: 8769793 / Laura Richards  Agent: |
|-----------------------------|---------------------------------|
| **Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2 |
| **Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )** |

1. **POLICY E2**

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

**Attached documents:**

| Comment ID: PSLPP16/5067  Respondent: 8770177 / Phil Attwood  Agent: |
|-----------------------------|---------------------------------|
| **Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2 |
| **Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )** |

6. **OBJECT** to the location for new employment floor space at Garlick’s Arch – Site A43 (Policy E2)
Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floor space will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floor space to be located at Garlick’s Arch, when just to the south, at Burnt Common, there is existing industrial development, with surplus land that could accommodate further development of 7,000 sq m.

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

Attached documents:

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Comment ID: PSLPP16/4889  Respondent: 8771233 / Ranald Mackinnon  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

1. POLICY E2

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floor space will be directed to the Industrial Strategic Employment Sites.

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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: PSLPP16/5584  Respondent: 8771265 / H C MacKinnon  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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 this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.
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There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:

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Comment ID: PSLPP16/5867  Respondent: 8772801 / David French  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

1. I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:

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Comment ID: PSLPP16/16693  Respondent: 8772801 / David French  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:

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Comment ID: PSLPP16/17024  Respondent: 8787969 / K Britton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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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: PSLPP16/11792  Respondent: 8797665 / Sylvia Lillywhite  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

I am sure Effingham Station is NOT in East Horsley, it is major junction for trains in our area, parking is already full by 10am. Effingham village the shops and businesses must be protected for the local residents

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

Attached documents:

Comment ID: PSLPP16/7558  Respondent: 8798849 / David Williams  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

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

Attached documents:

Comment ID: PSLPP16/2733  Respondent: 8798881 / H L Cousins  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

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

Attached documents:

Comment ID: PSLPP16/12746   Respondent: 8800545 / Bill Taylor   Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

Attached documents:

Comment ID: PSLPP16/2360   Respondent: 8806305 / Laurence Cook   Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

POLICY E2 - Location for new employment floor space

I OBJECT. It would be more sensible to confine all new office and research and development (use Class B1a and B1b) floor space to Guildford town centre. I oppose the policy of expanding the Research Park onto Blackwell Farm. 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?
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I object to this policy.

There is no need for additional employment land. The need arose only because AECOM adopted an unambitious target for land use efficiency - the target to have a land use efficiency no better than national averages. The borough should be more ambitious in its land use efficiency than this, given that 89% of the borough is green belt and that land costs are high.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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1. POLICY E2

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:

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Comment ID: PSLPP16/16646  Respondent: 8810849 / Charles Lee  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:

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Comment ID: PSLPP16/9284  Respondent: 8812097 / Clare Benzikie  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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 this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of 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:** PSLPP16/2750  **Respondent:** 8813601 / Gaenor Richards  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

I OBJECT to the location for new employment floorspace at Garlick's Arch -Site A43.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick's Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

**Attached documents:**

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**Comment ID:** PSLPP16/16440  **Respondent:** 8818625 / Beth and Frank Fuller  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

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**POLICY E2**

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

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4.4.15 The fact that bus 478 goes close to Horsley station 4 times a day does NOT make Horsley a transport interchange. Bus 478 runs Leatherhead to Guildford and therefore competes directly with the train and achieves little benefit from interchanging with rail, which is why most of the service goes down the A246. You need to address the basic nature of the bus services if you wish to have real interchanges at these stations.

4.4.17 It is the lack of other transport infrastructure at stations like Effingham that prevent them from being interchanges not their “remote” or “rural” location. It is likely that significant traffic from the proposed WISLEY development will use Effingham as a commuter station rather than any other transport. Just as lack of A3 connection will prevent them from travelling to Guildford directly. You should take care not to confuse “interchange” with work destination. This paragraph implies that employment locations are to be considered within 500m of certain stations. This may be but that is separate from a “transport interchange”. What is important is how much office development should be allowed within this radius without altering the nature of the local environment.

4.4.22 Once again we have unrestricted "growth” that has to be accommodated. Why is that?

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

**Attached documents:**

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There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:

Comment ID: PSLPP16/3123  Respondent: 8826177 / Charles Spence  Agent:

Policy E2 states that ‘proposals for new office and research and development floorspace will be directed first to Guildford town centre’. I object to this presumption which completely contradicts a desire to create sustainable local communities.

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

Attached documents:

Comment ID: PSLPP16/13377  Respondent: 8826369 / Tim Madge  Agent:

POLICY E2

I OBJECT to the location for new employment floor space (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

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We are of the opinion that all new office and research and development (use Class B1a and B1b) floor space should be within Guildford town centre.

We object to the policy of expanding the Research Park onto Blackwell Farm and do not believe there are exceptional circumstances to justify incursion into this permanent and high quality area of Green Belt.

The proposal to expand the 65,000 sq m by 9,000 sq m (existing allocation) with an additional 35,000 sq m amounts to an increase of 67% of the Research Park which is not required.

The valuable and workable concept of the Research Park should not have its integrity and purpose diluted by being converted into yet another Business Park for office users rather than research organisations.

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

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/7083</th>
<th>Respondent: 8837313 / Maria Baker</th>
<th>Agent:</th>
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<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy E2</td>
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I object to the location for new employment floorspace at Garlick’s Arch - Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B 1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick's Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:

Comment ID: PSLPP16/16221  Respondent: 8839041 / Jon Maslin  Agent:

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

I object to policy E2 location for new employment floor space.

I object to the policy of expanding the Research Park onto Blackwell Farm and I do not believe there are exceptional circumstances to justify incursion into this permanent and high quality area of Green Belt.

The Surrey Research Park currently extends to 65,000 sq m. There is already granted consent to expand to a further 9,000 sq m (14%).

The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis.

The ELNA 2015 calculated annual floor space demand is 0.7%.

The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period. The necessary growth in floor space over the plan period is therefore 17 years x 0.7% = 11.9%.

There is currently 14% expansion space already available.

The proposal by GBC to expand the 65,000 sq m by 9,000 sq m (existing allocation) with an additional 35,000 sq m amounts to an increase of 67% of the Research Park which is not required.

The Research Park is currently developed at a density of 25% plot ratio. The majority of existing buildings are 2 stories giving a developed floor space plot ratio of 12.5%.

The existing Research Park has the opportunity to markedly increase its density without infringing any Green Belt land nearby. Any density increase would be cost effective for the use of all existing infrastructure and would also have the potential to match the existing densities of existing academic buildings on the university campus which are three to four times higher.

Together with the existing expansion of 14% through existing consents and the opportunity to increase its density the Research Park has ample capacity to expand to embrace new demand for B1b uses linked to the university.

A preferred location for increased B1a and B1b space would be in the Town Centre close to housing and a convenient transport hub.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
POLICY E2

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:
Under this policy, areas within 500 meters of a "public transport interchange" play a key role.

Proposals for new office and research and development floorspace are to be directed to firstly Guildford town centre and then to areas within 500 meters of a public transport interchange ("PTI").

East Horsley has two railway stations, Horsley Station and Effingham Junction Station, but currently the draft Local Plan only proposes that Horsley Station should have PTI status.

The explanation given at 4.4.17 for Effingham Junction Station ("EJS") not enjoying this status is that either it is located within the Green Belt, or it is within an AONB or it is isolated away from the village or centre. It is not clear which of these applies to this particular station, but we believe strongly that none apply and that there is a strong case for EJS deserving PTI status in the same way as Horsley Station.

I will deal firstly with the three alternative reasons given for EJS not supposedly qualifying as a PTI.

Firstly there is the Green Belt aspect. This is not logical since if location within the Green Belt were determinative, this would mean that Horsley Station would also fail to gain PTI status.

Also the draft Local Plan proposes elsewhere at Policy P2 that the whole of East Horsley, including both Horsley Station and EJS, should be inset from the Green Belt. It will be seen elsewhere in these comments that I object strongly to this proposal, but the point remains that if location within the Green Belt were a valid reason for not being given PTI status, the Local Plan itself makes it clear that under Policy P2 this will not apply in the case of both Horsley Station and EJS.

Secondly EJS is not located in an AONB. EJS is within the envelope of the village settlement and will remain as such under the draft Local Plan.

Thirdly EJS is not "isolated" or "away from the village centre."

Effingham Junction (the area immediately south and west of EJS, served by respectively Forest Road south of the railway bridge and Old Lane) may not have the extensive shopping parades enjoyed by East Horsley's two other centres (Station Parade and Bishopsmead Parade) but it is a thriving community with a significant population and also a significant number of active and successful employment floorspaces and sites.

These include in Forest Road a general store (Forest Road General Store), a car sales and car repair business (PJB Car Sales/The Body Shop), a dental health centre and chiropractic clinic (Mortiboys) and on Horsley Road, Cedar Garden Centre, Royce Turf and Irrigation and at the Newmarsh Farm site, a number of businesses including Richmonds Horse Transport, Braye Hydraulic Repairs and TTS Surfacing Ltd.

It is therefore vital that the Local Plan's economy policies affecting the area protect these spaces and sites and create conditions for their sustainable growth and hence job creation.

Since all or most of these businesses are located within 500 meters of EJS, Policy E2 would be an invaluable driver for such growth which could play a major role in ensuring that Effingham Junction maintained and enhanced its position as
East Horsley's "third centre" for homes and jobs. On the other hand, to exclude EJS from PTI status could very well stifle its sustainable development and condemn it to a future as a dormitory "backwater" of East Horsley.

It is also counter-intuitive in the extreme to refuse EJS "PTI" status. This is for the simple reason that EJS is clearly a "public transport interchange" as that term would be normally understood. This is for the following reasons:

• as the name "Effingham Junction" indicates, EJS is at an important junction and the railway line from Guildford splits here into two lines which take different routes into London, so many London-bound passengers will change trains here;

• EJS serves not only the Effingham Junction area, but also the many residents of Effingham and Little Bookham for whom EJS is far closer than Bookham Station;

• EJS also serves the many residents of the Cobham area for whom EJS is far closer than Cobham and Stoke d'Abernon station EJS also serves the residents of Ockham and Ripley;

• EJS also serves the considerable numbers who visit local leisure activity sites, including three paintball sites and two clay pigeon shooting sites, for whom EJS is the only viable public transport hub; and

• EJS will be the nearest railway station to the land at the former Wisley Airfield site which is proposed for the building of 2000 homes under Policy A35 of the draft Local Plan and if, despite the objections of many including East Horsley Parish Council, this proceeds, then significant numbers of residents will be taking one form of travel to EJS and then interchanging onto the railway.

I accordingly OBJECT to Policy E2 insofar as it fails to confer "public transport interchange" status on Effingham Junction Station.

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

Attached documents:
**Comment ID:** PSLPP16/12854  **Respondent:** 8851233 / Helen Bayes  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

**POLICY E2: Location for new employment floorspace**

I object to Policy E2 insofar as it fails to confer "public transport interchange" status on Effingham Junction Station.

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

Attached documents:

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**Comment ID:** PSLPP16/10595  **Respondent:** 8855969 / Jonathan Murphy  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

I OBJECT to the location for new employment floorspace at Garlick's Arch -Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class Blc, 82 and 88) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick's Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:

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**Comment ID:** PSLPP16/17779  **Respondent:** 8858113 / Ramsey Nagaty  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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. I am of the opinion that all new office and research and development (use Class B1a and B1b) floor space should be within Guildford town centre. We do not support the policy of expanding the Research Park onto Blackwell Farm and we do not believe there are exceptional circumstances to justify incursion into this permanent and high quality area of Green Belt

- The Surrey Research Park currently extends to 65,000 sq m
- There is already granted consent to expand to a further 9,000 sq m (14%)
- The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis
- The ELNA 2015 calculated annual floor space demand is 0.7%
- The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period.
- The necessary growth in floor space over the plan period is therefore 17 years x 0.7% = 11.9%
• There is currently 14% expansion space already available
• The proposal by GBC to expand the 65,000 sq m by 9,000 sq m (existing allocation) with an additional 35,000 sq m amounts to an increase of 67% of the Research Park which is not required
• The Research Park is currently developed at a density of 25% plot ratio. The majority of existing buildings are 2 storeys giving a developed floor space plot ratio of 12.5%.
• The existing Research Park has the opportunity to markedly increase its density without infringing any Green Belt land nearby. Any density increase would be cost effective for the use of all existing infrastructure and would also have the potential to match the existing densities of existing academic buildings on the university campus which are three to four times higher.
• Together with the existing expansion of 14% through existing consents and the opportunity to increase its density the Research Park has ample capacity to expand to embrace new demand for B1b uses linked to the university.
• A preferred location for increased B1a and B1b space should be on other existing sites close to housing and a convenient transport hub

I am of the opinion that all new office and research and development (use Class B1a and B1b) floor space should be within Guildford town centre.

I object to the policy of expanding the Research Park onto Blackwell Farm and we do not believe there are exceptional circumstances to justify incursion into this permanent and high quality area of Green Belt

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Together with the existing expansion of 14% through existing consents and the opportunity to increase its density the Research Park has ample capacity to expand to embrace new demand for B1b uses linked to the university.

I do not accept that the valuable and workable concept of the Research Park should have its integrity and purpose diluted by being converted into yet another Business Park for office users rather than research organisations.

I do not agree with GBC statement that the Research Park is the only site in Guildford for research and intellectual businesses such companies can be based anywhere in the region.
A preferred location for increased B1a and B1b space should be in the Town Centre close to housing and a convenient transport hub.

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

Attached documents:

Comment ID: pslp171/2652  Respondent: 8858113 / Ramsey Nagaty  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy E2

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

13 POLICY E2: LOCATION OF EMPLOYMENT FLOORSPACE

13.1 I object to the change in policy E2 under paragraph 4.4.23a in relation to development involving waste management facilities to be directed to the Industrial Strategic Employment Sites.

- This fails to provide sufficient public consultation in relation to access and traffic flows
- This fails to provide sufficient public consultation in relation to unpleasant aspects of waste management

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

Attached documents:

Comment ID: PSLPP16/2425  Respondent: 8858433 / Eric Peters  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

Policy E2 - Location For New Employment Floorspace

There is no justification to build new B1 office employment floorspace in the Green Belt.

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

Attached documents:

Comment ID: PSLPP16/10384  Respondent: 8858881 / Stephen Meredith  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

I object to the location for new employment floorspace (Policy E2) as it would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.
I OBJECT to this policy as it stands. I am of the opinion that all new office and research and development (use Class B1a and B1b) floor space should be within Guildford town centre. I do not support the policy of expanding the Research Park onto Blackwell Farm and I do not believe there are exceptional circumstances to justify incursion into this permanent and high quality area of Green Belt.

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- A preferred location for increased B1a and B1b space should be on other existing sites close to housing and a convenient transport hub

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

Attached documents:

Comment ID: PSLPP16/2221  Respondent: 8860897 / Julia Shaw  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
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. I am of the opinion that all new office and research and development (use Class B1a and B1b) floor space should be within Guildford town centre. I do not support the policy of expanding the Research Park onto Blackwell Farm and I do not believe there are exceptional circumstances to justify incursion into this permanent and high quality area of Green Belt.
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1125  Respondent: 8860897 / Julia Shaw  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E2

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

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2. This fails to provide sufficient public consultation in relation to access and traffic flows

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

Attached documents:

Comment ID: PSLPP16/11369  Respondent: 8865537 / P Waldner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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: PSLPP16/14845  Respondent: 8865985 / Grant Ringshaw  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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Attached documents:

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Comment ID: PSLPP16/7157  Respondent: 8881345 / Lynne Ground  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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: PSLPP16/11578  Respondent: 8881537 / Jean Baptist  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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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: PSLPP16/5746  Respondent: 8883841 / Pamela French  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43

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Attached documents:

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Comment ID: PSLPP16/16616  Respondent: 8883841 / Pamela French  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

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<th>Comment ID: PSLPP16/14187</th>
<th>Respondent: 8887009 / Jacqueline Weller</th>
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POLICY E2: Location for new employment floorspace

Under this policy, areas within 500 meters of a "public transport interchange" play a key role.

Proposals for new office and research and development floorspace are to be directed to firstly Guildford town centre and then to areas within 500 meters of a public transport interchange ("PTI").

I OBJECT to Policy E2 - as it fails to confer "public transport interchange" status on Effingham Junction Station.

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

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<th>Comment ID: PSLPP16/13587</th>
<th>Respondent: 8887265 / Harvey Weller</th>
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<th>Respondent: 8892673 / Nick Forwood</th>
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6. I object to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

**Attached documents:**

---

Comment ID: PSLPP16/9283  **Respondent:**  8892737 / David Eagle  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

**I OBJECT** to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

**Attached documents:**

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Comment ID: PSLPP16/16971  **Respondent:**  8893057 / Dianne Garnett  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

**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 E2 location for new employment floor space

1.2 We are of the opinion that all new office and research and development (use Class B1a and B1b) floor space should be within Guildford town centre.

1.3 **We object** to the policy of expanding the Research Park onto Blackwell Farm and I do not believe there are exceptional circumstances to justify incursion into this permanent and high quality area of Green Belt
1.4 The Surrey Research Park currently extends to 65,000 sq m. There is already granted consent to expand to a further 9,000 sq m (14%)

1.5 The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis.

1.6 The ELNA 2015 calculated annual floor space demand is 0.7%.

1.7 The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period. The necessary growth in floor space over the plan period is therefore 17 years x 0.7% = 11.9%.

1.8 There is currently 14% expansion space already available.

1.9 The proposal by GBC to expand the 65,000 sq m by 9,000 sq m (existing allocation) with an additional 35,000 sq m amounts to an increase of 67% of the Research Park which is not required.

1.10 The Research Park is currently developed at a density of 25% plot ratio. The majority of existing buildings are 2 stories giving a developed floor space plot ratio of 12.5%.

1.11 The existing Research Park has the opportunity to markedly increase its density without infringing any Green Belt land nearby. Any density increase would be cost effective for the use of all existing infrastructure and would also have the potential to match the existing densities of existing academic buildings on the university campus which are three to four times higher.

1.12 Together with the existing expansion of 14% through existing consents and the opportunity to increase its density the Research Park has ample capacity to expand to embrace new demand for B1b uses linked to the university.

1.13 We do not accept that the valuable and workable concept of the Research Park should have its integrity and purpose diluted by being converted into yet another Business Park for office users rather than research organisations.

1.14 A preferred location for increased B1a and B1b space should be in the Town Centre close to housing and a convenient transport hub.

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

Attached documents:

Comment ID: PSLPP16/12141  Respondent: 8896097 / Andrew Fordham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

6. POLICY E2

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.
There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to
these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate
a further development of 7,000 sq m.

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

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<th>Respondent: 8900705 / Susan Fuller</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: PSLPP16/15025  Respondent: 8904129 / Elizabeth Ross  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of 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: PSLPP16/4186  Respondent: 8904673 / Colin Burnside  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

1. POLICY E2

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional
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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 employment strategy and impact at Garlick’s Arch (A43) (Policies E2 and E5)

There is no need for new industrial sites at Garlick’s Arch (A43). There is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000 sq m proposed. That site was removed from the Plan without any rationale.

Furthermore the development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been for there decades employing local people and are therefore clearly sustainable.

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

Attached documents:

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of 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: PSLPP16/3673  Respondent: 8906177 / Peter & Robyn Cormack  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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 brownfield land would be disproportionately used for commercial development and quite unnecessary retail expansion. Guildford is an attractive, thriving town. Overdevelopment will put such enormous strain on the limited land area and infrastructure that it will eventually have the negative effect of discouraging businesses and shoppers, who will look elsewhere. Brownfield sites should be used to include housing, not taking the easy option of using Green Belt land for housing development unnecessarily.

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

Attached documents:

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Comment ID: PSLPP16/14994  Respondent: 8906273 / G Baptist  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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: PSLPP16/9639  Respondent: 8906305 / Anne Fort  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
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Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:

Comment ID: PSLPP16/18422  Respondent: 8909761 / Diana Grover  Agent:

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

I OBJECT to the location for new employment floorspace (Policy E2)

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

Attached documents:

Comment ID: PSLPP16/12064  Respondent: 8914945 / Nichola Armstrong  Agent:

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

I object to policies E2 and E4. Surrey Research Park has already been granted permission to expand by a further 14%. This 14% has not yet been developed. However, The Plan proposes another large expansion even though there is already enough land to last the life time of this Plan. In 2015 Land and Assessment the ‘need’, growth was forecast at 11.9%. There is already permission granted 14%, which is enough to cover the 11.9% growth forecast. It is therefore inappropriate to propose another huge expansion ion green belt when it is not justified or required. Again the existing growth forecast should be reduced due to the referendum.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. POLICY E2

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

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

Attached documents:
I note the proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace.

Given the site at Burnt Common with ample surplus land that could accommodate a further development of 7,000 sq m, there is no need for new employment floorspace to be located at Garlick’s Arch.

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

Attached documents:

1. POLICY E2

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I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of 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: PSLPP16/10992  
**Respondent:** 8926401 / Christine Medlow  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

**E2 Location for new employment floorspace**

I disagree with the policy for second choice new employment sites to be within 500m of the “transport interchange” of London Road station. The station is a means of joining a train on a linear route, and it cannot be described as an interchange. The 500m radius would cover mainly an established residential area, including parts close to where I live, which should not be converted to business use.

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

Attached documents:

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Comment ID: PSLPP16/15144  
**Respondent:** 8926529 / Annie Cross  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

**Policy E2 - Location for New Employment Floorspace**

I object to excessive development anywhere in the borough when brownfield sites area available.

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

Attached documents:

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Comment ID: PSLPP16/11707  
**Respondent:** 8928033 / P. Richardson  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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:** PSLPP16/11930  **Respondent:** 8928289 / Trevor Skerritt  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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Attached documents:

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**Comment ID:** PSLPP16/67  **Respondent:** 8929057 / East Horsley Parish Council (Nick Clemens)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

**POLICY E2: Location for new employment floorspace**

Under this policy, areas within 500 meters of a "public transport interchange" play a key role.

Proposals for new office and research and development floorspace are to be directed to firstly Guildford town centre and then to areas within 500 meters of a public transport interchange ("PTI").

East Horsley has two railway stations, Horsley Station and Effingham Junction Station, but currently the draft Local Plan only proposes that Horsley Station should have PTI status.

The explanation given at 4.4.17 for Effingham Junction Station ("EJS") not enjoying this status is that either it is located within the Green Belt, or it is within an AONB or it is isolated away from the village or centre. It is not clear which of these applies to this particular station, but we believe strongly that none apply and that there is a strong case for EJS deserving PTI status in the same way as Horsley Station.

We will deal firstly with the three alternative reasons given for EJS not supposedly qualifying as a PTI.

Firstly there is the Green Belt aspect. This is not logical since if location within the Green Belt were determinative, this would mean that Horsley Station would also fail to gain PTI status.

Also the draft Local Plan proposes elsewhere at Policy P2 that the whole of East Horsley, including both Horsley Station and EJS, should be inset from the Green Belt. It will be seen elsewhere in these comments that EHPC objects strongly to this proposal, but the point remains that if location within the Green Belt were a valid reason for not being given PTI
status, the Local Plan itself makes it clear that under Policy P2 this will not apply in the case of both Horsley Station and EJS.

Secondly EJS is not located in an AONB. EJS is within the envelope of the village settlement and will remain as such under the draft Local Plan.

Thirdly EJS is not "isolated" or "away from the village centre."

Effingham Junction (the area immediately south and west of EJS, served by respectively Forest Road south of the railway bridge and Old Lane) may not have the extensive shopping parades enjoyed by East Horsley's two other centres (Station Parade and Bishopsmead Parade) but it is a thriving community with a significant population and also a significant number of active and successful employment floorspaces and sites.

These include in Forest Road a general store (Forest Road General Store), a car sales and car repair business (PJB Car Sales/The Body Shop), a dental health centre and chiropractic clinic (Mortiboys) and on Horsley Road, Cedar Garden Centre, Royce Turf and Irrigation and at the Newmarsh Farm site, a number of businesses including Richards Horse Transport, Braye Hydraulic Repairs and TTS Surfacing Ltd.

It is therefore vital that the Local Plan's economy policies affecting the area protect these spaces and sites and create conditions for their sustainable growth and hence job creation.

Since all or most of these businesses are located within 500 meters of EJS, Policy E2 would be an invaluable driver for such growth which could play a major role in ensuring that Effingham Junction maintained and enhanced its position as East Horsley's "third centre" for homes and jobs. On the other hand, to exclude EJS from PTI status could very well stifle its sustainable development and condemn it to a future as a dormitory "backwater" of East Horsley.

It is also counter-intuitive in the extreme to refuse EJS "PTI" status. This is for the simple reason that EJS is clearly a "public transport interchange" as that term would be normally understood. This is for the following reasons:

- as the name "Effingham Junction" indicates, EJS is at an important junction and interchange. The railway line from Guildford splits here into two lines which take different routes into London, so many London-bound passengers will change trains here;
- EJS serves not only the Effingham Junction area, but also the many residents of Effingham and Little Bookham for whom EJS is far closer than Bookham Station;
- EJS also serves the many residents of the Cobham area for whom EJS is far closer than Cobham and Stoke d'Abernon station EJS also serves the residents of Ockham and Ripley;
- EJS also serves the considerable numbers who visit local leisure activity sites, including three paintball sites and two clay pigeon shooting sites, for whom EJS is the only viable public transport hub; and
- EJS will be the nearest railway station to the land at the former Wisley Airfield site which is proposed for the building of 2000 homes under Policy A35 of the draft Local Plan and if, despite the objections of many including East Horsley Parish Council, this proceeds, then significant numbers of residents will be taking one form of travel to EJS and then interchanging onto the railway.

EHPC accordingly OBJECTS to Policy E2 insofar as it fails to confer "public transport interchange" status on Effingham Junction Station.

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

Attached documents:
1. POLICY E2

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:
A strategic employment site at Ash railway station would allow office buildings of a significant size and other substantial buildings to be erected. The drawing on page 301 clearly shows that such buildings could be erected within 500m of the railway station. If a mistake has been made and the distance is far less than 500m, the mistake should be corrected.

The drawing on page 301 sums up the need for you to withdraw your proposal. You have included the following buildings and land within the 500m area, yet for obvious reasons, offices etc should not be erected in their vicinity.

**Ash, North and West of A323**

- primary school
- cemetery
- ancient parish church (11th century)
- old house (Hartshorn, 14th century)
- housing (in depth)

*Note: The Thames Basin Heaths Special Protection Area is not within the 500m area but it is very close to it.*

**Ash, South and East of A323**

- housing (in depth, existing or about to be developed)
- land needed for a road and pedestrian bridge over the railway (no alternative site)
- land needed for an off street car and cycle park (the existing car park is inadequate)
- manor house with moat (13th century)
- church hall
- old rectory (Elizabethan)
- church

I regret to say that your drawing on page 301 looks somewhat cavalier. It does not fully take into account the need for new development to be in keeping with existing development (which is mainly housing). See Policy D4 on page 119. It fails to protect a historic area, much of which has a pleasant character. There may be scope in the future to improve the character of some of the area (eg where there is a car sales business on the A323) but a significant amount of office development – which is strongly implied by your proposal - would harm the existing character of the general area.

Which buildings do you propose to demolish? Which open space will be used for offices etc?

Is there firm evidence that offices are needed within 500m of Ash railway station now, or during the life of the Local plan, or beyond? Even if there were to be a specific need, it should be borne in mind that it is not uncommon for offices to become empty for long periods. There have been empty offices in Farnborough (only a few miles away) for many years.

For the avoidance of doubt, of course there is no objection to continuation of the present small scale employment immediately next to Ash railway station.

You appear to be misusing the word 'buffer' in a totally inappropriate manner when you show a 500m buffer area. Do you mean that development which is not for offices, will not be allowed? Are you confusing the buffer at a railway station? Are you implying, with the word 'buffer', that residents should not worry about office development near their homes and gardens? The word 'zone' is used in Policy P4 and the word 'zone' would be better than 'buffer'.


Add to 4.4.21: The 500m zone around a transport interchange means that new employment (eg office development) may be allowed anywhere within 500m of the transport interchange.

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

Page 75 Policy E2 Location for new Employment Floorspace

Page 76 Definitions, Paragraphs 4.4.15 and 4.4.17

You appear to be misusing the word 'buffer' in a totally inappropriate manner when you show a 500m buffer area. Do you mean that development which is not for offices, will not be allowed? Are you confusing the buffer at a railway station? Are you implying, with the word 'buffer', that residents should not worry about office development near their homes and gardens? The word 'zone' is used in Policy P4 and the word 'zone' would be better than 'buffer'.

Add to 4.4.21: The 500m zone around a transport interchange means that new employment (eg office development) may be allowed anywhere within 500m of the transport interchange.

Attached documents:

Comment ID: pslp171/816  Respondent: 8933537 / Annie Ladd  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E2

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

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:

Comment ID: PSLPP16/17116  Respondent: 8940225 / Glen Ruddy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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 location for new employment floorspace at Garlick's Arch -Site A43 (Policy E2)
Proposals for new industrial, warehousing and storage (use Class Blc, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick's Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:

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Comment ID: PSLPP16/16047  Respondent: 8941761 / FLGCA (Paul Kassell)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

We object to the Research Park encroaching further onto the Green Belt. This does not constitute exceptional circumstances required 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: pslp171/1889  Respondent: 8945441 / Hazel A. Jarvis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E2

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

1. The amount of retail floorspace planned for the town centre is too high, although lower than before, given the trends in retailing. I think that there should be a first class bus station preferably located on the existing bus station site.

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

Attached documents:

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Comment ID: pslp171/1304  Respondent: 8947457 / Gerry Armstrong  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E2

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

I object to Policy E1 and E2 because it is nationally recognised there is a down turn in retail within town centres. Employment in this sector is in decline due the rapid rise of internet shopping. It would be better used for mixed housing.

This week I received a leaflet from local supplier Afinity Water, highlighting that ‘After months of low rainfall, water resources are below average’...... ‘after months of low winter rainfall, our groundwater resources remain well below
average – despite the rain in May and June’. Here is a good example illustrating that our natural resources have limits and could fail under such large scale excessive demands from new development.

No one seems to be looking at the ‘big picture’ realistically or considering the overall impact that these large developments, in close proximity to each other, will have on the area! It is downright irresponsible that this has not been factored into council plans and the overall housing numbers substantially reduced.

In conclusion I object to the unsustainable, unrealistic levels of homes the Government are pushing on Councils in the South East of England. Our roads are already running above capacity. This whole area is in serious danger of grinding to a complete standstill. The addition of 60,000 cars from new development joining the network (large scale developments in neighbouring Aldershot, Waverly, Woking and Rushmoor) would simply be too much for the area and would destroy our environment.

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

Attached documents:
Employment

11. In Policy E2 why, in para 4.4.17 has Effingham Junction been omitted as a public transport interchange with no specific reason given? It is more of an interchange than Clandon or Horsley stations and probably has more businesses within its 500 metre envelope then either of them, especially if retail is excluded.

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

Attached documents:

Comment ID: PSLPP16/17302  Respondent: 8967233 / University of Surrey (University of Surrey)  Agent: Terence O'Rourke (Luke Vallins)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

The University notes the sequential approach proposed through Policy E2 in relation to the location of new office and research and development floorspace in the borough. This policy states that:

“Proposals for new office and research and development (use Class B1a and B1b) floorspace will be directed first to Guildford town centre, then sequentially to:

- locations within 500m of a public transport interchange,
- Office and Research & Development Strategic Employment Sites unless the proposed floorspace is limited in scale (less than 200 sq m or 25% of the existing office/R&D floorspace whichever is the lower) and/or ancillary to the primary use of the site OR the proposed floorspace meets the criteria set out in policy E4 and is appropriate to be located on Surrey Research Park.”

The University does not consider that this approach is the most sustainable way of planning for the delivery of future employment space in the borough. The plan is not sound on this issue and this requires a change.

New development, irrespective of the type of development proposed, should be delivered in the most sustainable locations. The University therefore does not consider that all new office and research and development floorspace should necessarily be directed first to Guildford town centre, because there can be no guarantee that this will in fact be the most sustainable location. For example, the plan proposes the creation of new strategic development sites, such as the urban extension at Blackwell Farm, whilst identifying office and research and development strategic employment sites, both of which would not be deemed priority sites for development according to this policy.

It is therefore considered that the sequential approach proposed through Policy E2 should be replaced and new employment floorspace should be directed to the most sustainable locations in the borough. In some circumstances this may be in the town centre, but in other circumstances it may well be in other locations.

The following change to wording is proposed:

“Proposals for new office and research and development (use Class B1a and B1b) floorspace will be directed to the following locations:

- Guildford town centre
- Office and Research & Development Strategic Employment Sites unless the proposed floorspace is limited in scale (less than 200 sq m or 25% of the existing office/R&D floorspace whichever is the lower) and/or ancillary to the primary use of the site OR the proposed floorspace meets the criteria set out in policy E4 and is appropriate to be located on Surrey Research Park.
- Locations within 500m of a public transport interchange
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16065  Respondent: 8968001 / M & G Real Estate  Agent: Terence O'Rourke (Tim Hancock)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

3.11 M&G objects to paragraph 4.4.18 of the Plan which makes reference to: “The bus station in Guildford town centre is defined as a public transport interchange. When it is replaced on site or by a suitable alternative arrangement to be located either partly or wholly on or off site these will be defined as a public transport interchanges.”

3.12 There is no scope to replace the existing bus station on site as part of the redevelopment. Previous schemes have been unviable because of the previous requirement to re-provide the bus station on site. A fundamental assumption of the proposed M&G scheme for North Street is that the bus station would be completely redeveloped. The M&G scheme does not include a replacement bus station, but a series of new on-street bus stop facilities can be incorporated into the proposals to change traffic circulation in the town centre.

3.13 Policy E7 outlines that approximately 1,172 new homes, particularly on upper floors as part of a mixed used development should be accommodated by 2033. The North Street development would contribute to this total.

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

Attached documents:

Comment ID: PSLPP16/13109  Respondent: 8993121 / Shelagh Yeomans  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

Policy E2: Location for new employment floorspace

I OBJECT to this policy

In my opinion all new office and research and development (use Class B1a and B1b) floor space should be within Guildford town centre. I do not support the policy of expanding the Research Park onto Blackwell Farm and we do not believe there are exceptional circumstances 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: PSLPP16/8677  Respondent: 9050337 / Nigel Geary  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Under this policy, areas within 500 meters of a "public transport interchange" play a key role.

Proposals for new office and research and development floorspace are to be directed to firstly Guildford town centre and then to areas within 500 meters of a public transport interchange ("PTI").

East Horsley has two railway stations, Horsley Station and Effingham Junction Station, but currently the draft Local Plan only proposes that Horsley Station should have PTI status.

The explanation given at 4.4.17 for Effingham Junction Station ("EJS") not enjoying this status is that either it is located within the Green Belt, or it is within an AONB or it is isolated away from the village or centre. It is not clear which of these applies to this particular station, but we believe strongly that none apply and that there is a strong case for EJS deserving PTI status in the same way as Horsley Station.

I will deal firstly with the three alternative reasons given for EJS not supposedly qualifying as a PTI.

Firstly there is the Green Belt aspect. This is not logical since if location within the Green Belt were determinative, this would mean that Horsley Station would also fail to gain PTI status.

Also the draft Local Plan proposes elsewhere at Policy P2 that the whole of East Horsley, including both Horsley Station and EJS, should be inset from the Green Belt. It will be seen elsewhere in these comments that I object strongly to this proposal, but the point remains that if location within the Green Belt were a valid reason for not being given PTI status, the Local Plan itself makes it clear that under Policy P2 this will not apply in the case of both Horsley Station and EJS.

Secondly EJS is not located in an AONB. EJS is within the envelope of the village settlement and will remain as such under the draft Local Plan.

Thirdly EJS is not "isolated" or "away from the village centre."

Effingham Junction (the area immediately south and west of EJS, served by respectively Forest Road south of the railway bridge and Old Lane) may not have the extensive shopping parades enjoyed by East Horsley's two other centres (Station Parade and Bishopsmead Parade) but it is a thriving community with a significant population and also a significant number of active and successful employment floorspaces and sites.

These include in Forest Road a general store (Forest Road General Store), a car sales and car repair business (PJB Car Sales/The Body Shop), a dental health centre and chiropractic clinic (Mortiboys) and on Horsley Road, Cedar Garden Centre, Royce Turf and Irrigation and at the Newmarsh Farm site, a number of businesses including Richards Horse Transport, Braye Hydraulic Repairs and TTS Surfacing Ltd.

It is therefore vital that the Local Plan's economy policies affecting the area protect these spaces and sites and create conditions for their sustainable growth and hence job creation.

Since all or most of these businesses are located within 500 meters of EJS, Policy E2 would be an invaluable driver for such growth which could play a major role in ensuring that Effingham Junction maintained and enhanced its position as East Horsley's "third centre" for homes and jobs. On the other hand, to exclude EJS from PTI status could very well stifle its sustainable development and condemn it to a future as a dormitory "backwater" of East Horsley.

It is also counter-intuitive in the extreme to refuse EJS "PTI" status. This is for the simple reason that EJS is clearly a "public transport interchange" as that term would be normally understood. This is for the following reasons:
• as the name "Effingham Junction" indicates, EJS is at an important junction and interchange. The railway line from Guildford splits here into two lines which take different routes into London, so many London-bound passengers will change trains here;

• EJS serves not only the Effingham Junction area, but also the many residents of Effingham and Little Bookham for whom EJS is far closer than Bookham Station;

• EJS also serves the many residents of the Cobham area for whom EJS is far closer than Cobham and Stoke d'Abernon station EJS also serves the residents of Ockham and Ripley;

• EJS also serves the considerable numbers who visit local leisure activity sites, including three paintball sites and two clay pigeon shooting sites, for whom EJS is the only viable public transport hub; and

• EJS will be the nearest railway station to the land at the former Wisley Airfield site which is proposed for the building of 2000 homes under Policy A35 of the draft Local Plan and if, despite the objections of many including East Horsley Parish Council, this proceeds, then significant numbers of residents will be taking one form of travel to EJS and then interchanging onto the

I object to Policy E2 insofar as it fails to confer "public transport interchange” status on Effingham Junction Station.

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

Attached documents:

Comment ID: PSLPP16/11444  Respondent: 9062913 / Susan Parker  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

POLICY E2 Location for new employment floorspace

OBJECT I am of the opinion that all new office and research and development (use Class B1a and B1b) floor space should be within Guildford town centre. I do not support the policy of expanding the Research Park onto Blackwell Farm and we do not believe there are exceptional circumstances 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: pslp171/1856  Respondent: 9062913 / Susan Parker  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E2

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

I object to the change in policy E2 under paragraph 4.4.23a in relation to development involving waste management facilities to be directed to the Industrial Strategic Employment Sites.

This fails to provide sufficient public consultation in relation to access and traffic flows

This fails to provide sufficient public consultation in relation to unpleasant aspects of waste management
Policy E2: Location of New Employment Floorspace

Object (not effective in respect of NPPF paragraph 182)

WPI is concerned that draft policy E2 may be in conflict with the proposed strategic allocations, including the Wisley new settlement, which make provision for B Class employment, on-site. Clearly, for proportional employment in excess of 200 sq m, new strategic allocations are sequentially preferable sites. The draft policy should be amended to ensure that it is effective and consistent with the overall GBLP.

<table>
<thead>
<tr>
<th>Policy/Section/page/para</th>
<th>Original Changes requested (July 2016 Representation)</th>
<th>Understanding of changes shown in the Focused Amendments (June 2017)</th>
<th>WPI Comments (Updated Representation)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy E2: Location of New Employment Floorspace Page 67</td>
<td>Include an additional bullet point within the draft policy, under bullet point 2: &quot;Proposed local centres or defined employment locations within proposed strategic site allocations, as outlined in Table 1 and the Proposals Map.&quot;</td>
<td>(Page 75) Table 1 has been removed from the Plan. The specific wording requested has not been included as a focused amendment but there is a new reference to a sequential test.</td>
<td>Support clarification to the policy. Objection withdrawn.</td>
</tr>
</tbody>
</table>
A new para 2 has been added stating that the sequential test does not apply to allocations.

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

Attached documents:

Comment ID: PSLPP16/7011  Respondent: 9094753 / D Jones  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:

Comment ID: PSLPP16/4479  Respondent: 9298465 / Peter Grover  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

1. POLICY E2

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floor space will be directed to the Industrial Strategic Employment Sites.
There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:

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Comment ID: PSLPP16/14950  Respondent: 9327009 / sp2 Consulting Limited (Stephen Parker)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

I OBJECT. I believe that all new office and research and development (use Class B1a and B1b) floor space should be within Guildford town centre. I do not support the policy of expanding the Research Park onto Blackwell Farm and I do not believe there are exceptional circumstances 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:

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Comment ID: PSLPP16/10641  Respondent: 9335041 / David Reeve  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

Policy E2: Location for New Employment Floorspace

I OBJECT to this policy on the following grounds:

- Allowing new office and research and development (use Class B1a and B1b) floorspace to be developed within 500m of Horsley station is out of keeping with the existing neighbourhood, and would adversely change the character of the area.
- The proposed expansion of the Research Park onto Blackwell Farm is premature. It is unacceptable to undertake further development on high quality greenfield land while the density of the existing development is relatively low, and while a significant area of the Park is absorbed by surface car parking (as is also the case on a significant area of the main University of Surrey Campus).

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

Attached documents:

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Comment ID: pslp171/2635  Respondent: 9335041 / David Reeve  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Policy E8 states that “District Centres sit in the middle of the retail hierarchy, and the whole of that Policy refers to retail uses. Paragraph 4.4.91 states that “Most ground floor uses in District Centres are within the ‘A Use Class’, that is, they are shopping area uses. Other uses typically found in shopping/ service centres are outside of the ‘A Use Class’, and include health and fitness centres, arts and culture, nail bars, and hotels”.

However, Policy E2 seems to aim to extend the purpose of District Centres so that the draft Local Plan considers them for locations of new employment floorspace, in addition to their main purpose as retail centres – which is at odds with the entire description of Policy E8.

Furthermore, it is extremely odd that Horsley Station is described as a “transport interchange”. The only interchanging that would be possible would be between train and bus services. There is a good train service between London and Guildford, but the bus services at Horsley station are extremely limited:

- four buses run daily (Mon-Fri only) between Guildford and Leatherhead (478 Service).
- five buses run daily (Mon-Fri only) between Leatherhead and Guildford (478 Service).
- The Howard of Effingham school bus service runs once a day in each direction (678 Service).

As In previous drafts of the Local Plan, there is a substantial overemphasis of the facilities in East and West Horsley, which seems to be an attempt to justify the excessive level of development that is proposed.

The “Transport Interchanges (Horsley)” map in Appendix A1 shows that the circle of 500m radius centred on Horsley station encloses only the following (ranked in terms of reducing area):

- Residential homes
- Green space
- Station Parade retail area
- The Village Hall
- The Medical Centre
- Glenesk School
- Two small offices, one housed in the station building, and the other converted from its previous use as a medical centre.

There is no purpose-built office employment space at present, and I am not aware of any need for it in this area.

The rather fanciful categorisation of Horsley station as a “transport interchange” just because it is “in close proximity to [a] district centre”, and the resulting dubious suggestion that the neighbourhood should be considered as suitable for new employment floorspace need to be re-examined. I therefore object to this Policy.

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

Attached documents:
There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000sq m.

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

Attached documents:

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**Comment ID:** PSLPP16/10518  **Respondent:** 10299041 / F McHugh  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

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There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:

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**Comment ID:** PSLPP16/4683  **Respondent:** 10580385 / Brenda Aldred  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

4. ECONOMY POLICIES

POLICY E2: Location for new employment floorspace

East Horsley has two railway stations, Horsley Station and Effingham Junction Station, but currently the draft Local Plan only proposes that Horsley Station should have PTI status (within 500 meters of a public transport interchange).

The explanation given at 4.4.17 for Effingham Junction Station ("EJS") not enjoying this status is that either it is located within the Green Belt, or it is within an AONB or it is isolated away from the village or centre. There is a strong case for EJS deserving PTI status in the same way as Horsley Station.

1. Both stations are within the Green
2. EJS is not located in an AONB. EJS is within the envelope of the village settlement and will remain as such under the draft Local Plan.
3. EJS is not "isolated" or "away from the village centre."

Effingham Junction area of East Horsley is a thriving community with a significant population and also a number of businesses. Including a General Store, car sales and car repair business, Dentist and Chiropractic clinic, Garden Centre, Beautician, Yoga venue, Interior Design business and a Village Hall used by keepfit classes and other groups.

The Local Plan's economy policies affecting this area must protect this site creating conditions for growth and job creation.

Also EJS is clearly a "public transport interchange". This is for the following reasons:

1. EJS is at an important junction and interchange. The railway line from Guildford splits here into two lines which take different routes into London, many London bound passengers will change trains here.
2. EJS also serves residents of Effingham and Little Bookham for whom EJS is closer than Bookham Station.
3. EJS also serves those who visit local leisure activity sites, including three paintball sites and two clay pigeon shooting sites.
4. EJS will be the nearest railway station to the land at the former Wisley Airfield site which is proposed for the building of 2000 homes under Policy A35 of the draft Local Plan.

I therefore OBJECT to Policy E2 where it fails to confer "public transport interchange" status on Effingham Junction Station.

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

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/8223</th>
<th>Respondent: 10662849 / Garry Walton</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2</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>

8. I object to the employment strategy and impact at Garlick’s Arch (A43) (Policies E2 and E5) There is no need for new industrial sites at Garlick’s Arch (A43). There is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000 sq m proposed. That site was removed from the Plan without any reasoning. Furthermore the development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been for there decades employing local people and are therefore clearly sustainable.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/4531</th>
<th>Respondent: 10667073 / Trudi Harris</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 E2 - Location for new employment floorspace

I OBJECT. It would be more sensible to confine all new office and research and development (use Class B1a and B1b) floor space to Guildford town centre. I oppose the policy of expanding the Research Park onto Blackwell Farm (see my reference to “regulatory capture” of local public policy by the University, Policy H1, above). 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:

<table>
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<tr>
<th>Comment ID: PSLPP16/5919</th>
<th>Respondent: 10672417 / Matthew Kalupka</th>
<th>Agent:</th>
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</tr>
</tbody>
</table>

6. I OBJECT to the location for new employment floorspace at Garlick's Arch - Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class Blc, 82 and 88) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick's Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:
1. I object to the location for new employment floor space at Garlick's Arch - Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floor space will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floor space to be located at Garlick's Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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: PSLPP16/11722</th>
<th>Respondent: 10723553 / Judith Pound</th>
<th>Agent:</th>
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<tbody>
<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>
<td></td>
</tr>
</tbody>
</table>

1. I OBJECT to the location of new employment floor space at Garlick’s Arch – Site A43 (Policy E2)

The Policy states that:-

“Where net additional floorspace exceeding 200 sq m or 25% of the existing office/R&D floorspace is proposed (whichever is the lower) in the redevelopment or extension of a building in locations other than those set out above, it will need to be demonstrated that there are:

- no sites available in the locations set out above
- there is a demonstrated need, and
- the site is or will be made accessible by sustainable modes of transport.”

There is no need for the new employment floor space to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

There is no demonstrable need and the proposed site will create a traffic nightmare for the residents of Ripley, Burnt Common and Send Marsh.

To be precise, it fails on all counts.

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

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14784</th>
<th>Respondent: 10735777 / S. May</th>
<th>Agent:</th>
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</table>

I OBJECT to the employment strategy and impact on Garlick’s Arch (A43) (Policies E2 and E5). The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable.

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

**Attached documents:**
Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

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<th>Comment ID: PSLPP16/4979</th>
<th>Respondent: 10758593 / Richard &amp; Delia Baker</th>
<th>Agent:</th>
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<td>1. I OBJECT to the location for new employment floorspace at Garlick's Arch - Site A43 (Policy E2)</td>
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Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

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<th>Comment ID: PSLPP16/12206</th>
<th>Respondent: 10765249 / Andy &amp; Sonja Freebody</th>
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<td>I OBJECT to the location for new employment floorspace (Policy E2)</td>
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I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to the location for new employment floorspace (Policy E2)

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Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

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There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:

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**Comment ID:** PSLPP16/9125  **Respondent:** 10785633 / Penelope Eagle  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:

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**Comment ID:** PSLPP16/15026  **Respondent:** 10796417 / Richard Shenton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/334</th>
<th>Respondent: 10799169 / Neal Basson</th>
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**POLICY E2 Location for new employment floorspace**

OBJECT: I am of the opinion that all new office and research and development (use Class B1a and B1b) floor space should be within Guildford town centre. I do not support the policy of expanding the Research Park onto Blackwell Farm and I do not believe there are exceptional circumstances 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?

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<th>Comment ID: PSLPP16/18380</th>
<th>Respondent: 10799169 / Neal Basson</th>
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OBJECT: I am of the opinion that all new office and research and development (use Class B1a and B1b) floor space should be within Guildford town centre. I do not support the policy of expanding the Research Park onto Blackwell Farm and I do not believe there are exceptional circumstances 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?

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OBJECT: I am of the opinion that all new office and research and development (use Class B1a and B1b) floor space should be within Guildford town centre. I do not support the policy of expanding the Research Park onto Blackwell Farm and I do not believe there are exceptional circumstances 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:
We OBJECT to this policy as it stands. We are of the opinion that all new office and research and development (use Class B1a and B1b) floor space should be within Guildford town centre. We do not support the policy of expanding the Research Park onto Blackwell Farm and we do not believe there are exceptional circumstances to justify incursion into this permanent and high quality area of Green Belt

- The Surrey Research Park currently extends to 65,000 sq m
- There is already granted consent to expand to a further 9,000 sq m (14%)
- The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis
- The ELNA 2015 calculated annual floor space demand is 0.7%
- The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period.
- The necessary growth in floor space over the plan period is therefore 17 years x 0.7% = 11.9%
- There is currently 14% expansion space already available
- The proposal by GBC to expand the 65,000 sq m by 9,000 sq m (existing allocation) with an additional 35,000 sq m amounts to an increase of 67% of the Research Park which is not required
- The Research Park is currently developed at a density of 25% plot ratio. The majority of existing buildings are 2 storeys giving a developed floor space plot ratio of 12.5%.
- The existing Research Park has the opportunity to markedly increase its density without infringing any Green Belt land nearby. Any density increase would be cost effective for the use of all existing infrastructure and would also have the potential to match the existing densities of existing academic buildings on the university campus which are three to four times higher.
- Together with the existing expansion of 14% through existing consents and the opportunity to increase its density the Research Park has ample capacity to expand to embrace new demand for B1b uses linked to the university.
- A preferred location for increased B1a and B1b space should be on other existing sites close to housing and a convenient transport hub

The ELNA 2015 calculated annual floor space demand is 0.7%. The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period. The necessary growth in floor space over the plan period is therefore 17 years x 0.7% = 11.9%. There is currently 14% expansion space already available. The proposal by GBC to expand the 65,000 sq m by 9,000 sq m (existing allocation) with an additional 35,000 sq m amounts to an increase of 67% of the Research Park which is not required. The Research Park is currently developed at a density of 25% plot ratio. The majority of existing buildings are 2 stories giving a developed floor space plot ratio of 12.5%. The existing Research Park has the opportunity to markedly increase its density without infringing any Green Belt land nearby.

Any density increase would be cost effective for the use of all existing infrastructure and would also have the potential to match the existing densities of existing academic buildings on the university campus which are three to four times higher. Together with the existing expansion of 14% through existing consents and the opportunity to increase its density the Research Park has ample capacity to expand to embrace new demand for B1b uses linked to the university. We do not accept that the valuable and workable concept of the Research Park should have its integrity and purpose diluted by being...
converted into yet another Business Park for office users rather than research organisations. A preferred location for increased B1a and B1b space should be in the Town Centre close to housing and a convenient transport hub.

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

Attended documents:

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**Comment ID:** PSLPP16/823  **Respondent:** 10804961 / M. Basson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

**OBJECT:** I am of the opinion that all new office and research and development (use Class B1a and B1b) floor space should be within Guildford town centre. I do not support the policy of expanding the Research Park onto Blackwell Farm and I do not believe there are exceptional circumstances 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?

Attended documents:

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**Comment ID:** PSLPP16/12468  **Respondent:** 10805537 / Robert Mote  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

**I object to the employment strategy and impact on Garlicks Arch (A43) (Policies E2 and E5)**

The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable.

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

Attended documents:

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**Comment ID:** PSLPP16/11047  **Respondent:** 10809377 / Bernice Williams  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

1. **POLICY E2**

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptiona
circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class Blc, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick's Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:

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Comment ID: PSLPP16/11892  Respondent: 10811361 / Simon Crago  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

I object to the location for new employment floor space (Policy E2).

It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:

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Comment ID: PSLPP16/12366  Respondent: 10811681 / Linda Knight  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

12. I object to the employment strategy and impact on Garlicks Arch (A43) (Policies E2 and E5)

The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable.

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

Attached documents:

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Comment ID: PSLPP16/12204  Respondent: 10816993 / Jane Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:

Comment ID: PSLPP16/13941  Respondent: 10822913 / Karen Dougherty  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:

Comment ID: PSLPP16/6635  Respondent: 10829121 / Julie Brown  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to POLICY E2 - Location for new employment floorspace

• It would be more sensible to confine all new office and research and development (use Class B1a and B1b) floor space to Guildford town centre.

• I oppose the policy of expanding the Research Park onto Blackwell Farm. 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:

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<th>Comment ID: PSLPP16/5826</th>
<th>Respondent: 10836033 / Katherine Gervasio</th>
<th>Agent:</th>
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<td>There is no need for new industrial sites on Green Belt at Garlick’s Arch (A43). There is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000sq m proposed. That site was removed from the Plan without any reasoning.</td>
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</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16680</th>
<th>Respondent: 10836033 / Katherine Gervasio</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2</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 employment strategy and impact at Garlick’s Arch (A43) (Policies E2)</td>
<td>There is no need for new industrial sites on Green Belt at Garlick’s Arch (A43). There is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000sq m proposed. That site was removed from the Plan without any reasoning.</td>
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<th>Comment ID: PSLPP16/3474</th>
<th>Respondent: 10843361 / Natalie Brown</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 object to POLICY E2 - Location for new employment floorspace</td>
<td>It would be more sensible to confine all new office and research and development (use Class B1a and B1b) floor space to Guildford town centre.</td>
<td></td>
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<tr>
<td></td>
<td>I oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.</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: PSLPP16/14463  Respondent: 10846625 / Frank Drennan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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 E2 “location for new employment floor space” on the grounds that;

1.2 I am of the opinion that all new office and research and development (use Class B1a and B1b) floor space should be within Guildford town centre.

1.3 I object to the policy of expanding the Research Park onto Blackwell Farm and I do not believe there are exceptional circumstances to justify incursion into this permanent and high quality area of Green Belt

1.4 The Surrey Research Park currently extends to 65,000 sq m. There is already granted consent to expand to a further 9,000 sq m (14%)

1.5 The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis.

1.6 The ELNA 2015 calculated annual floor space demand is 0.7%.

1.7 The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period. The necessary growth in floor space over the plan period is therefore 17 years x 0.7% = 11.9%.

1.8 There is currently 14% expansion space already available.

1.9 The proposal by GBC to expand the 65,000 sq m by 9,000 sq m (existing allocation) with an additional 35,000 sq m amounts to an increase of 67% of the Research Park which is not required.

1.10 The Research Park is currently developed at a density of 25% plot ratio. The majority of existing buildings are 2 stories giving a developed floor space plot ratio of 12.5%.

1.11 The existing Research Park has the opportunity to markedly increase its density without infringing any Green Belt land nearby. Any density increase would be cost effective for the use of all existing infrastructure and would also have the potential to match the existing densities of existing academic buildings on the university campus which are three to four times higher.

1.12 Together with the existing expansion of 14% through existing consents and the opportunity to increase its density the Research Park has ample capacity to expand to embrace new demand for B1b uses linked to the university.

1.13 I do not accept that the valuable and workable concept of the Research Park should have its integrity and purpose diluted by being converted into yet another Business Park for office users rather than research organisations

1.14 A preferred location for increased B1a and B1b space should be in the Town Centre close to housing and a convenient transport hub

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

Attached documents:
Comment ID: pslp171/1109  Respondent: 10846625 / Frank Drennan  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy E2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

I object to the change in policy E2 under paragraph 4.4.23a in relation to development involving waste management facilities to be directed to the Industrial Strategic Employment Sites.

- This fails to provide sufficient public consultation in relation to access and traffic flows
- This fails to provide sufficient public consultation in relation to unpleasant aspects of waste management

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

Attached documents:

Comment ID: pslp171/2138  Respondent: 10847521 / Andrew Procter  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy E2  
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 change in policy E2 under paragraph 4.4.23a in relation to development involving waste management facilities to be directed to the Industrial Strategic Employment Sites.

• This fails to provide sufficient public consultation in relation to access and traffic flows
• This fails to provide sufficient public consultation in relation to unpleasant aspects of waste management

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

Attached documents:

Comment ID: PSLPP16/7174  Respondent: 10854113 / Sarah Pickering  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

WE OBJECT to the location for new employment floor space (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floor space will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floor space to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/2172</th>
<th>Respondent: 10855553 / Emma Tallick</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2</td>
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12. I object to the employment strategy and impact at Garlick’s Arch (A43) (Policies E2 and E5)

There is no need for new industrial sites at Garlick’s Arch (A43). There is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000 sq m proposed. That site was removed from the Plan without any reasoning.

Furthermore the development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been for there decades employing local people and are therefore clearly sustainable.

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

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<tr>
<th>Comment ID: PSLPP16/14645</th>
<th>Respondent: 10857249 / Alice Pashley</th>
<th>Agent:</th>
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I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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: PSLPP16/8858</th>
<th>Respondent: 10857889 / William Kyte OBE</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 this policy as it stands.

I do not support the policy of expanding the Research Park onto Blackwell Farm and I do not believe there are exceptional circumstances to justify incursion into this 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: PSLPP16/18597  Respondent: 10858977 / Angela Otterson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

I object to policy E2 location for new employment floor space

I am of the opinion that all new office and research and development (use Class B1a and B1b) floor space should be within Guildford town centre.

I object to the policy of expanding the Research Park onto Blackwell Farm and I do not believe there are exceptional circumstances to justify incursion into this permanent and high quality area of Green Belt.

The Surrey Research Park currently extends to 65,000 sq m. There is already granted consent to expand to a further 9,000 sq m (14%)

The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis.

The ELNA 2015 calculated annual floor space demand is 0.7%.

The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period. The necessary growth in floor space over the plan period is therefore 17 years x 0.7% = 11.9%.

There is currently 14% expansion space already available.

The proposal by GBC to expand the 65,000 sq m by 9,000 sq m (existing allocation) with an additional 35,000 sq m amounts to an increase of 67% of the Research Park which is not required.

The Research Park is currently developed at a density of 25% plot ratio. The majority of existing buildings are 2 stories giving a developed floor space plot ratio of 12.5%.

The existing Research Park has the opportunity to markedly increase its density without infringing any Green Belt land nearby. Any density increase would be cost effective for the use of all existing infrastructure and would also have the potential to match the existing densities of existing academic buildings on the university campus which are three to four times higher.

Together with the existing expansion of 14% through existing consents and the opportunity to increase its density the Research Park has ample capacity to expand to embrace new demand for B1b uses linked to the university.

I do not accept that the valuable and workable concept of the Research Park should have its integrity and purpose diluted by being converted into yet another Business Park for office users rather than research organisations.
A preferred location for increased B1a and B1b space should be in the Town Centre close to housing and a convenient transport hub.

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

Attached documents:

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Comment ID: pslp171/1950  Respondent: 10859489 / Jennifer Procter  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy E2

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

1 POLICY E2: LOCATION OF EMPLOYMENT FLOORSpace

1.1 I object to the change in policy E2 under paragraph 4.4.23a in relation to development involving waste management facilities to be directed to the Industrial Strategic Employment Sites.

- This fails to provide sufficient public consultation in relation to access and traffic flows
- This fails to provide sufficient public consultation in relation to unpleasant aspects of waste management

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

Attached documents:

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Comment ID: PSLPP16/16019  Respondent: 10859553 / MARK Curtis  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

POLICY E2: LOCATION OF EMPLOYMENT FLOORSpace

I object to policy E2 location for new employment floor space

I object to the policy of expanding the Research Park onto Blackwell Farm and I do not believe there are exceptional circumstances to justify incursion into this permanent and high quality area of Green Bel

The Surrey Research Park currently extends to 65,000 sq m. There is already granted consent to expand to a further 9,000 sq m (14%)

The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis

The ELNA 2015 calculated annual floor space demand is 0.7%.

The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period. The necessary growth in floor space over the plan period is therefore 17 years x 0.7% = 11.9%.

There is currently 14% expansion space already available.
The proposal by GBC to expand the 65,000 sq m by 9,000 sq m (existing allocation) with an additional 35,000 sq m amounts to an increase of 67% of the Research Park which is not required.

The Research Park is currently developed at a density of 25% plot ratio. The majority of existing buildings are 2 stories giving a developed floor space plot ratio of 12.5%.

The existing Research Park has the opportunity to markedly increase its density without infringing any Green Belt land nearby. Any density increase would be cost effective for the use of all existing infrastructure and would also have the potential to match the existing densities of existing academic buildings on the university campus which are three to four times higher.

Together with the existing expansion of 14% through existing consents and the opportunity to increase its density the Research Park has ample capacity to expand to embrace new demand for B1b uses linked to the university.

A preferred location for increased B1a and B1b space would be in the Town Centre close to housing and a convenient transport hub

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

Attached documents:

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Comment ID: PSLPP16/11831  Respondent: 10863969 / Joanne Rooke  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable.

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

Attached documents:

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Comment ID: PSLPP16/1602  Respondent: 10865537 / Edwina Fassom  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

1. I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:
Comment ID: PSLPP16/11008  Respondent: 10878977 / Lisbet Hjort Jensen  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

I OBJECT to the location for new employment floor space at Garlick's Arch - Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class Blc,B2 and BS) floor space will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floor space to be located at Garlick's Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:

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Comment ID: PSLPP16/18201  Respondent: 10883201 / Danny McHugh  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:

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Comment ID: PSLPP16/1101  Respondent: 10884993 / Dave Fassom  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:

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**Comment ID:** PSLPP16/6846  **Respondent:** 10889985 / Ruth Macdonald  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:

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**Comment ID:** PSLPP16/13495  **Respondent:** 10890177 / Cheryl Burnside  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

**POLICY E2**

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to the employment strategy and impact at Garlick’s Arch (A43) (Policies E2 and E5).

There is no need for new industrial sites at Garlick’s Arch (A43). There is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000 sq m proposed. That site was removed from the Plan without any rationale.

Furthermore the development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been for there decades employing local people and are therefore clearly sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Thirdly EJS is not "isolated" or "away from the village centre."

Effingham Junction (the area immediately south and west of EJS, served by respectively Forest Road south of the railway bridge and Old Lane) may not have the extensive shopping parades enjoyed by East Horsley's two other centres (Station Parade and Bishopsmead Parade) but it is a thriving community with a significant population and also a significant number of active and successful employment floorspaces and sites.

These include in Forest Road a general store (Forest Road General Store), a car sales and car repair business (PJB Car Sales/The Body Shop), a dental health centre and chiropractic clinic (Mortiboys) and on Horsley Road, Cedar Garden Centre, Royce Turf and Irrigation and at the Newmarsh Farm site, a number of businesses including Richards Horse Transport, Braye Hydraulic Repairs and TTS Surfacing Ltd.

It is therefore vital that the Local Plan's economy policies affecting the area protect these spaces and sites and create conditions for their sustainable growth and hence job creation.

Since all or most of these businesses are located within 500 meters of EJS, Policy E2 would be an invaluable driver for such growth which could play a major role in ensuring that Effingham Junction maintained and enhanced its position as East Horsley's "third centre" for homes and jobs. On the other hand, to exclude EJS from PTI status could very well stifle its sustainable development and condemn it to a future as a dormitory "backwater" of East Horsley.

It is also counter-intuitive in the extreme to refuse EJS "PTI" status. This is for the simple reason that EJS is clearly a "public transport interchange" as that term would be normally understood. This is for the following reasons:

1. as the name "Effingham Junction" indicates, EJS is at an important junction and The railway line from Guildford splits here into two lines which take different routes into London, so many London-bound passengers will change trains here;
2. EJS serves not only the Effingham Junction area, but also the many residents of Effingham and Little Bookham for whom EJS is far closer than Bookham Station;
3. EJS also serves the many residents of the Cobham area for whom EJS is far closer than Cobham and Stoke d'Abernon station EJS also serves the residents of Ockham and Ripley;
4. EJS also serves the considerable numbers who visit local leisure activity sites, including three paintball sites and two clay pigeon shooting sites, for whom EJS is the only viable public transport hub; and
5. EJS will be the nearest railway station to the land at the former Wisley Airfield site which is proposed for the building of 2000 homes under Policy A35 of the draft Local Plan and if, despite the objections of many including East Horsley Parish Council, this proceeds, then significant numbers of residents will be taking one form of travel to EJS and then interchanging onto the railway.

EHPC accordingly OBJECTS to Policy E2 insofar as it fails to confer "public transport interchange" status on Effingham Junction Station.

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

Attached documents:
There is no need for new industrial sites at Garlick’s Arch (A43). There is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000 sq m proposed. That site was removed from the Plan without any reasoning.

Furthermore the development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been for there decades employing local people and are therefore clearly sustainable.

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

Attached documents:

Comment ID: pslp171/1967  Respondent: 10911201 / Claire Walker  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E2

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

I support the removal of Wanborough from the transport intersections definition.

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

Attached documents:

Comment ID: PSLPP16/15511  Respondent: 10911425 / Andrew Gray  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

I object to the employment strategy and impact at Garlick’s Arch (A43) (Policies E2 and E5)

There is no need for new industrial sites at Garlick’s Arch (A43) - tere is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000 sq m proposed. That site was removed from the Plan without any reasoning.

Furthermore the development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been for there decades employing local people.

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

Attached documents:

Comment ID: PSLPP16/2471  Respondent: 10912705 / Tim Williams  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

It is illogical that Effingham Junction Station should be denied the status of Public Transport Interchange.
Effingham Junction Station (EJS) is within the envelope of the village settlement and will remain as such under the draft Local Plan. It is not "isolated" or "away from the village centre." Effingham Junction (the area immediately south and west of EJS, served by respectively Forest Road south of the railway bridge and Old Lane) is a thriving community with a significant population and also a significant number of active and successful employment floorspaces and sites. These include in Forest Road a general store (Forest Road General Store), a car sales and car repair business (PJB Car Sales/The Body Shop), a dental health centre and chiropractic clinic (Mortiboys) and on Horsley Road, Cedar Garden Centre, Royce Turf and Irrigation and at the Newmarsh Farm site, a number of businesses including Richmonds Horse Transport, Braye Hydraulic Repairs and TTS Surfacing Ltd. It is therefore vital that the Local Plan's economy policies affecting the area protect these spaces and sites and create conditions for their sustainable growth and hence job creation. Since all or most of these businesses are located within 500 meters of EJS, Policy E2 would be an invaluable driver for such growth which could play a major role in ensuring that Effingham Junction maintained and enhanced its position as East Horsley's "third centre" for homes and jobs. On the other hand, to exclude EJS from PTI status could very well stifle its sustainable development and condemn it to a future as a dormitory "backwater" of East Horsley. It is also counter-intuitive in the extreme to refuse EJS "PTI" status. This is for the simple reason that EJS is clearly a "public transport interchange" as that term would be normally understood. This is for the following reasons:

1. as the name "Effingham Junction" indicates, EJS is at an important junction and interchange. The railway line from Guildford splits here into two lines which take different routes into London, so many London-bound passengers will change trains here;
2. EJS serves not only the Effingham Junction area, but also the many residents of Effingham and Little Bookham for whom EJS is far closer than Bookham Station;
3. EJS also serves the many residents of the Cobham area for whom EJS is far closer than Cobham and Stoke d'Abernon station EJS also serves the residents of Ockham and Ripley;
4. EJS also serves the considerable numbers who visit local leisure activity sites, including three paintball sites and two clay pigeon shooting sites, for whom EJS is the only viable public transport hub; and
5. EJS will be the nearest railway station to the land at the former Wisley Airfield site which is proposed for the building of 2000 homes under Policy A35 of the draft Local Plan and if, despite the objections of many including East Horsley Parish Council, this proceeds, then significant numbers of residents will be taking one form of travel to EJS and then interchanging onto the railway.

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

Attached documents:

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**Comment ID:** PSLPP16/14449  **Respondent:** 10922177 / Paul Knight  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

12. I object to the employment strategy and impact on Garlicks Arch (A43) (Policies E2 and E5)

The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable.

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

Attached documents:
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<th>Respondent: 10933793 / Julia Tilbury</th>
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Attached documents:

**Comment ID:** PSLPP16/15368  **Respondent:** 10935201 / Cathryn Walton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

I OBJECT. It would be more sensible to confine all new office and research and development (use Class B1a and B1b) floor space to Guildford town centre. I oppose the policy of expanding the Research Park onto Blackwell Farm (see my reference to “regulatory capture” of local public policy by the University, Policy H1, above). 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:** PSLPP16/12803  **Respondent:** 10940833 / Natasha Taylor  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

I object to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick's Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:

**Comment ID:** PSLPP16/9287  **Respondent:** 10943457 / Henry Benzikie  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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:** PSLPP16/6471  **Respondent:** 10949921 / Jan Parker  **Agent:**  
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2  
**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )  

I object to the employment strategy and impact on Garlick’s Arch (A43) (Policies E2 and E5) The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable.

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

Attached documents:

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**Comment ID:** PSLPP16/3042  **Respondent:** 10952705 / Moira Maidment  **Agent:**  
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2  
**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )  

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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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: PSLPP16/6654  Respondent: 10958753 / Ingrid Molossi  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to the location for new employment floorspace at Garlick's Arch - Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick's Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:

Comment ID: PSLPP16/17739  Respondent: 10958913 / Alan Batterbury  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the employment strategy and impact at Garlick's Arch (A43) (Policies E2 and E5)

There is no need for new industrial sites at Garlick's Arch (A43). There is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7000 sq m proposed. The site was removed from the Plan without and reasoning.

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

Attached documents:
**Comment ID:** PSLPP16/8984  **Respondent:** 10959009 / Rebecca Claridge  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:

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**Comment ID:** PSLPP16/18400  **Respondent:** 10959265 / Inger & Ron Ward  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

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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:** PSLPP16/10482  **Respondent:** 10960033 / Lucinda Kalupka  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

1. I OBJECT to the location for new employment floorspace at Garlick's Arch - Site A43 (Policy E2)
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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: PSLPP16/12282  **Respondent:** 10962689 / Martin Ladd  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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 this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of 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: PSLPP16/14397  **Respondent:** 10962785 / Derek Gilmore  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

I OBJECT to the location for new employment floorspace (Policy E2)

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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:** PSLPP16/12963  **Respondent:** 10972065 / Sarah Cocke  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

1. **POLICY E2**

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of 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:** PSLPP16/9203  **Respondent:** 10985057 / Anthony Parker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

POLICY E2 Location for new employment floor space – I OBJECT. I believe that all new office and research and development (use Class B1a and B1b) floor space should be within Guildford town centre. I do not support the policy of expanding the Research Park onto Blackwell Farm and I do not believe there are exceptional circumstances 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:

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**Comment ID:** PSLPP16/4988  **Respondent:** 10986689 / Richard Harris  **Agent:**
1. I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

   Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

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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 this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

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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: PSLPP16/7386  Respondent: 10992833 / Amanda Verny White  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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: PSLPP16/7012  Respondent: 10997121 / Rob Curling  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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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: PSLPP16/11176  Respondent: 10998081 / David Marshall  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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: PSLPP16/15295  Respondent: 11007393 / James Culmer  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
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There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:

Comment ID: PSLPP16/3964  Respondent: 11008225 / Russell Pascoe  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.
There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.
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There is no need for the new employment floor space to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

Policy E2 - Location For New Employment Floorspace

There is no justification to build new B1 office employment floorspace in the Green Belt.

I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)
Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

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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:** PSLPP16/11671  **Respondent:** 11024257 / Jenny Richardson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

*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:** PSLPP16/716  **Respondent:** 11029409 / John Lay  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

11.) The employment strategy and the impact at Garlick’s Arch – Site A43 (Policies E2 and E5)

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

Attached documents:

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**Comment ID:** PSLPP16/14132  **Respondent:** 11036289 / Osman Abdullah  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

I object to policy E2 location for new employment floor space I object to the policy of expanding the Research Park onto Blackwell Farm and I do not believe there are exceptional circumstances to justify incursion into this permanent and high quality area of Green BelThe Surrey Research Park currently extends to 65,000 sq m. There is already granted consent to
expand to a further 9,000 sq m (14%). The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis. The ELNA 2015 calculated annual floor space demand is 0.7%. The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period. The necessary growth in floor space over the plan period is therefore 17 years x 0.7% = 11.9%. There is currently 14% expansion space already available. The proposal by GBC to expand the 65,000 sq m by 9,000 sq m (existing allocation) with an additional 35,000 sq m amounts to an increase of 67% of the Research Park which is not required. The Research Park is currently developed at a density of 25% plot ratio. The majority of existing buildings are 2 stories giving a developed floor space plot ratio of 12.5%. The existing Research Park has the opportunity to markedly increase its density without infringing any Green Belt land nearby. Any density increase would be cost effective for the use of all existing infrastructure and would also have the potential to match the existing densities of existing academic buildings on the university campus which are three to four times higher. Together with the existing expansion of 14% through existing consents and the opportunity to increase its density the Research Park has ample capacity to expand to embrace new demand for B1b uses linked to the university. A preferred location for increased B1a and B1b space would be in the Town Centre close to housing and a convenient transport hub.

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

Attached documents:

Comment ID: PSLPP16/14593  Respondent: 11036801 / Judith Mercer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

I OBJECT to POLICY E2 (Location for new employment floor space)

I oppose the policy of extending the Research Park onto Blackwell Farm. There has been no exceptional circumstances as defined in NPPF given to support such development on this area of Green Belt.

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

Attached documents:

Comment ID: PSLPP16/1876  Respondent: 11037441 / Bryan Joseph  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

My comments relate to Horsley and Effingham Junction Stations.

Effingham Junction station is an interchange as it connects local buses and two train lines. Whilst its usage is lower than that of Horsley, according to the National Passenger Survey numbers and the number of Season Tickets originating at the station, it is well used by the population of Bookham and Effingham and it is within 0.5km of its own parade of shops including a Dental Surgery and a Goods Yard for special purpose railway equipment. It is also used by three local paintball facilities and by staff and others accessing the Drift Golf Club. It does not seem to reflect conjoined thinking if you are planning 2000 homes at Wisley and then not considering its nearest local station as an interchange. If that development should occur then it clearly will be.
Horsley is an interchange and we note the plans for further development at Ockham Road North and also in West Horsley. Some consideration should be given to the needs of the Parish in defining how this interchange is developed 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: PSLPP16/7330  Respondent: 11041121 / Catherine Dean  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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 would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. 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:

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Comment ID: PSLPP16/1901  Respondent: 11041281 / Chris Harlow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

6. I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:

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Comment ID: PSLPP16/11550  Respondent: 11042433 / Sam Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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: PSLPP16/12711  Respondent: 11042433 / Sam Thompson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
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: PSLPP16/5499  Respondent: 11043553 / Geraldine Banks  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY E2

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

Attached documents:

Comment ID: PSLPP16/14597  Respondent: 11044129 / Christopher Barrass  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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: PSLPP16/4869  Respondent: 11047329 / Hazel Corstin  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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: pslp171/251  Respondent: 11051521 / J and M Baylis  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy E2

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

Policy E2 (1) and 4.4.14 give priority to the town centre, but this is not reflected in site allocations. It should be, for example as regards the station site and North Street. The issue is discussed in 4.4.22 but is not resolved.

Policy E2 (2) should continue to include reference to the Research Park (Policy E4) because of its importance to the Borough.

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

Attached documents:

Comment ID: PSLPP16/12833  Respondent: 11053825 / Claire Owen  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

I OBJECT to the location for new employment floorspace (Policy E2)

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

Attached documents:

Comment ID: pslp171/986  Respondent: 11053825 / Claire Owen  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy E2

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

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Review for duly made

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/12319</th>
<th>Respondent: 11054049 / Clare Goodall</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2</td>
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<tr>
<th>Comment ID: PSLPP16/14251</th>
<th>Respondent: 11061185 / Peter Komisarczuk</th>
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</table>

I object to the employment strategy and impact at Garlick’s Arch (A43) (Policies E2 and E5)

There is no need for new industrial sites at Garlick’s Arch (A43). There is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000 sq m proposed. That site was removed from the Plan without any reasoning. In addition there was discussion of more at Slyfield rather than around Burnt Common.
Furthermore the development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been here for decades employing local people and are therefore clearly sustainable. If this plan were to go ahead would the GBC sufficiently help these businesses to move into suitable local alternatives?

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

Attached documents:

Comment ID: pslp171/2376  Respondent: 11071553 / Nicholas Roberts  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

• The council plans for the town and employment (E1 & E2) take no account of modern trends highlighted in previous consultations. The public seem better informed than the council and its consultants about these. The council want to waste space with low-value and land-hungry enterprises, such as warehouses, that employ few people and just add to heavy traffic, ignoring Guildford’s comparative economic advantages of a well-educated labour force and location for high-value businesses, which will therefore go elsewhere. They also want to fill the town with shops, ignoring the general global trend away from town-centre shopping and the opportunity to regenerate the decaying town centre with low-cost housing, as has happened in central London. The plan fails to make any arguments for putting commercial development instead on green-field sites such as Burnt Common, which is introduced for the first time in this version of the plan without any supporting rationale.

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

Attached documents:

Comment ID: PSLPP16/12388  Respondent: 11074465 / Louise Vaughan  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY E2

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

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The Surrey Research Park currently extends to 65,000 sq m. There is already granted consent to expand to a further 9,000 sq m (14%) The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis. The ELNA 2015 calculated annual floor space demand is 0.7%. The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period. The necessary growth in floor space over the plan period is therefore 17 years x 0.7% = 11.9%. There is currently 14% expansion space already available.

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A preferred location for increased B1a and B1b space would be in the Town Centre close to housing and a convenient transport hub.
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<tr>
<th>Comment ID: PSLPP16/15860</th>
<th>Respondent: 11098369 / Neil &amp; Nicki Covington</th>
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<th>Comment ID: PSLPP16/6820</th>
<th>Respondent: 11114721 / Elizabeth Wilcockson</th>
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<td>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;</td>
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<th>Comment ID: PSLPP16/15842</th>
<th>Respondent: 11150913 / Sarah Marshall</th>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1131  Respondent: 11151617 / Nigel Tallick  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the employment strategy and impact at Garlick’s Arch (A43) (Policies E2 and E5)

There is no need for new industrial sites at Garlick’s Arch (A43). There is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000 sq m proposed. That site was removed from the Plan without any reasoning.

Furthermore the development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been for there decades employing local people and are therefore clearly sustainable.

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

Attached documents:

Comment ID: PSLPP16/2015  Respondent: 11160001 / Andy Freebody  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:

Comment ID: PSLPP16/2477  Respondent: 14181313 / Vision for Guildford Ltd - GVG (William Stokoe)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )
Walnut Tree Close and Woodbridge Meadows, in particular, should be given over to well-planned housing and the scattered light industrial provision should be relocated to an expanded Slyfield where infrastructure and communications would be better.

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

Attached documents:

D OBJECTION TO POLICY E2: LOCATION OF NEW EMPLOYMENT FLOORSPACE

43. The objectives of Policy E2 are inconsistent with the objectives of Policy E In relation to Locally Significant Employment Sites, Policy E1 (as drafted, not what is proposed above) says:

"The Locally Significant Employment Sites will be protected and within these sites changes of use to non-employment uses resisted. The retention and regeneration of these sites is encouraged and intensification where possible will be considered to be appropriate”.

There is therefore a clear indication in Policy E1 that regeneration is encouraged and intensification - where possible - considered to be appropriate.

44. This contrasts with the phraseology of Policy E2 which directs intensification and expansion to strategic sites and where only 200sqm of additional floorspace (an entirely arbitrary and unexplained figure) would constrain the expansion/intensification of Locally Significant Employment Sites Moreover, the policy goes on to say:

"The expansion of existing offices in locations outside town centres and Strategic Employment Sites should be limited and any development not limited in scale is to be directed to sequentially preferable locations”.

45. These sentiments clearly do not align with the Policy support given in Policy E2 is then contradicted with its reasoned justification as expressed at para 4.4.23:

"To ensure the supply of premises is suitable for modern business needs, renewal including redevelopment of existing offices is encouraged.”

46. An informed reader is therefore left with contradictory policy statements as to how a specific site should be considered. In particular, the arbitrary limit of increases in floor area of 200 sqm should be deleted. That figure may be appropriate for a small employment site but is a totally unrealistic figure when assessing the needs of a site such as Send Business Centre with over 8000 sqm existing floorspace. Accordingly, Policy E2 should be re-casted to take account of the anomalies identified above.

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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<tbody>
<tr>
<td>18</td>
<td>POLICY E2: LOCATION OF EMPLOYMENT FLOORSPACE</td>
</tr>
<tr>
<td>18.1</td>
<td>I object to policy E2 location for new employment floor space</td>
</tr>
<tr>
<td>18.2</td>
<td>I am of the opinion that all new office and research and development (use Class B1a and B1b) floor space should be within Guildford town centre.</td>
</tr>
<tr>
<td>18.3</td>
<td>I object to the policy of expanding the Research Park onto Blackwell Farm and I do not believe there are exceptional circumstances to justify incursion into this permanent and high quality area of Green Belt</td>
</tr>
<tr>
<td>18.4</td>
<td>The Surrey Research Park currently extends to 65,000 sq m. There is already granted consent to expand to a further 9,000 sq m (14%)</td>
</tr>
<tr>
<td>18.5</td>
<td>The past trend of expansion of Office/R &amp;D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis.</td>
</tr>
<tr>
<td>18.6</td>
<td>The ELNA 2015 calculated annual floor space demand is 0.7%.</td>
</tr>
<tr>
<td>18.7</td>
<td>The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period. The necessary growth in floor space over the plan period is therefore 17 years x 0.7% = 11.9%.</td>
</tr>
<tr>
<td>18.8</td>
<td>There is currently 14% expansion space already available.</td>
</tr>
<tr>
<td>18.9</td>
<td>The proposal by GBC to expand the 65,000 sq m by 9,000 sq m (existing allocation) with an additional 35,000 sq m amounts to an increase of 67% of the Research Park which is not required.</td>
</tr>
<tr>
<td>18.10</td>
<td>The Research Park is currently developed at a density of 25% plot ratio. The majority of existing buildings are 2 stories giving a developed floor space plot ratio of 12.5%.</td>
</tr>
<tr>
<td>18.11</td>
<td>The existing Research Park has the opportunity to markedly increase its density without infringing any Green Belt land nearby. Any density increase would be cost effective for the use of all existing infrastructure and would also have the potential to match the existing densities of existing academic buildings on the university campus which are three to four times higher.</td>
</tr>
<tr>
<td>18.12</td>
<td>Together with the existing expansion of 14% through existing consents and the opportunity to increase its density the Research Park has ample capacity to expand to embrace new demand for B1b uses linked to the university.</td>
</tr>
<tr>
<td>18.13</td>
<td>I do not accept that the valuable and workable concept of the Research Park should have its integrity and purpose diluted by being converted into yet another Business Park for office users rather than research organisations</td>
</tr>
<tr>
<td>18.14</td>
<td>A preferred location for increased B1a and B1b space should be in the Town Centre close to housing and a convenient transport hub</td>
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</table>

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/700</th>
<th>Respondent: 15084897 / Save Send Action Group (Andrew Procter)</th>
<th>Agent:</th>
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I object to the change in policy E2 under paragraph 4.4.23a in relation to development involving waste management facilities to be directed to the Industrial Strategic Employment Sites.

- This fails to provide sufficient public consultation in relation to access and traffic flows.
- This fails to provide sufficient public consultation in relation to unpleasant aspects of waste management.

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

Attached documents:

I object to the employment strategy and impact on Garlicks Arch (A43) (Policies E2 and E5).

The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable.
<table>
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<tr>
<th>Comment ID: PSLPP16/724</th>
<th>Respondent: 15155201 / Ann Lay</th>
<th>Agent:</th>
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<td>11.) The employment strategy and the impact at Garlick's Arch (A43), (Policies E2 &amp; E5).</td>
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<th>Comment ID: PSLPP16/740</th>
<th>Respondent: 15155617 / David Vallath-Patel</th>
<th>Agent:</th>
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<th>Comment ID: PSLPP16/1528</th>
<th>Respondent: 15177505 / Iain Guest</th>
<th>Agent:</th>
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<td>I disagree with 4.4.17 in that I believe Effingham Junction Railway station should be given PTI status as serves the local community East Horsley, Effingham, Cobham and Bookham.</td>
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| Comment ID: PSLPP16/1527 | Respondent: 15177537 / Elizabeth Guest | Agent: |
I disagree with 4.417 in that Effingham Junction Railway Station should be given PTI status as it serve the local community of East Horsley, Effingham, Cobham & Bookham.

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

Attached documents:
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There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:

Comment ID: pslp171/1061  Respondent: 15232993 / Grant Consultancy (Alastair Grant)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E2

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

We are concerned with the inference given in Policy E2 that there will be some form of ‘sequential test’ in considering proposals for employment development on designated Strategic Employment Sites (unless it is for development of less than 200sqm). This is at odds with other parts of the Employment policies. If otherwise acceptable proposals come forward on a Strategic Employment Site, why should such proposals need to be ‘sequentially tested’?

For example, Send Business Centre provides for the creation and development of small and local businesses by encouraging a range of types and sizes of new premises including incubator units, managed workspace and serviced office accommodation – precisely the type of business accommodation identified under Policy E1(3) that the Plan says: ‘will be supported’.

Similarly, Policy E5(1)(a) says the sustainable growth and expansion of all types of business and enterprise in rural areas will be supported, through inter alia provision of well-designed new buildings of appropriate scale, provided they are in accordance with (where relevant, green belt policy) and other policies in the plan.

Furthermore, it is noted that Industrial, warehousing and storage development is not ‘sequentially tested’. (see Policy E2(5).

We believe that if employment proposals otherwise meet with other policies in the Plan, then there is no need to sequentially test employment development on Strategic Employment Sites.

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

Attached documents:

Comment ID: PSLPP16/1449  Respondent: 15233025 / Wey Estates Ltd (Michael Hamburger)  Agent: Grant Consultancy (Alastair Grant)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

see attached document, paras 43-46 in particular
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [Representations on behalf of Wey Estates Ltd.pdf](612 KB)

Comment ID: pslp171/902  Respondent: 15233025 / Wey Estates Ltd (Michael Hamburger)  Agent: Grant Consultancy (Alastair Grant)

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy E2

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

Policy E2 Locations of new employment floorspace

We are concerned with the inference given in Policy E2 that there will be some form of ‘sequential test’ in considering proposals for employment development on designated Strategic Employment Sites (unless it is for development of less than 200sqm). This is at odds with other parts of the Employment policies. If otherwise acceptable proposals come forward on a Strategic Employment Site, why should such proposals need to be ‘sequentially tested’?

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Furthermore, it is noted that Industrial, warehousing and storage development is not ‘sequentially tested’. (see Policy E2(5).

We believe that if employment proposals otherwise meet with other policies in the Plan, then there is no need to sequentially test employment development on Strategic Employment Sites.

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

Comment ID: PSLPP16/1739  Respondent: 15244641 / Wesley Raynbird-Tilbury  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

POLICY E2 - Location for new employment floorspace

I OBJECT . It would be more sensible to confine all new office and research and development (use Class B1a and B1b) floor space to Guildford town centre. I oppose the policy of expanding the Research Park onto Blackwell Farm (see my reference to “regulatory capture” of local public policy by the University, Policy H1, above). 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?
POLICY E2: Location for new employment floorspace

Under this policy, areas within 500 meters of a "public transport interchange" play a key role.

Proposals for new office and research and development floorspace are to be directed to firstly Guildford town centre and then to areas within 500 meters of a public transport interchange ("PTI").

East Horsley has two railway stations, Horsley Station and Effingham Junction Station, but currently the draft Local Plan only proposes that Horsley Station should have PTI status.

The explanation given at 4.4.17 for Effingham Junction Station ("EJS") not enjoying this status is that either it is located within the Green Belt, or it is within an AONB or it is isolated away from the village or centre. It is not clear which of these applies to this particular station, but we believe strongly that none apply and that there is a strong case for EJS deserving PTI status in the same way as Horsley Station.

I will deal firstly with the three alternative reasons given for EJS not supposedly qualifying as a PTI.

Firstly there is the Green Belt aspect. This is not logical since if location within the Green Belt were determinative, this would mean that Horsley Station would also fail to gain PTI status.

Also the draft Local Plan proposes elsewhere at Policy P2 that the whole of East Horsley, including both Horsley Station and EJS, should be inset from the Green Belt. It will be seen elsewhere in these comments that I object strongly to this proposal, but the point remains that if location within the Green Belt were a valid reason for not being given PTI status, the Local Plan itself makes it clear that under Policy P2 this will not apply in the case of both Horsley Station and EJS.

Secondly EJS is not located in an AONB. EJS is within the envelope of the village settlement and will remain as such under the draft Local Plan.

Thirdly EJS is not "isolated" or "away from the village centre."

Effingham Junction (the area immediately south and west of EJS, served by respectively Forest Road south of the railway bridge and Old Lane) may not have the extensive shopping parades enjoyed by East Horsley's two other centres (Station Parade and Bishopsmead Parade) but it is a thriving community with a significant population and also a significant number of active and successful employment floorspaces and sites.

These include in Forest Road a general store (Forest Road General Store), a car sales and car repair business (PJB Car Sales/The Body Shop), a dental health centre and chiropractic clinic (Mortiboys) and on Horsley Road, Cedar Garden Centre, Royce Turf and Irrigation and at the Newmarsh Farm site, a number of businesses including Richmonds Horse Transport, Braye Hydraulic Repairs and TTS Surfacing Ltd.

It is therefore vital that the Local Plan's economy policies affecting the area protect these spaces and sites and create conditions for their sustainable growth and hence job creation.

Since all or most of these businesses are located within 500 meters of EJS, Policy E2 would be an invaluable driver for such growth which could play a major role in ensuring that Effingham Junction maintained and enhanced its position as
East Horsley's "third centre" for homes and jobs. On the other hand, to exclude EJS from PTI status could very well stifle its sustainable development and condemn it to a future as a dormitory "backwater" of East Horsley.

It is also counter-intuitive in the extreme to refuse EJS "PTI" status. This is for the simple reason that EJS is clearly a "public transport interchange" as that term would be normally understood. This is for the following reasons:

1. As the name "Effingham Junction" indicates, EJS is at an important junction and interchange. The railway line from Guildford splits here into two lines which take different routes into London, so many London-bound passengers will change trains here;
2. EJS serves not only the Effingham Junction area, but also the many residents of Effingham and Little Bookham for whom EJS is far closer than Bookham Station;
3. EJS also serves the many residents of the Cobham area for whom EJS is far closer than Cobham and Stoke d'Abernon station EJS also serves the residents of Ockham and Ripley;
4. EJS also serves the considerable numbers who visit local leisure activity sites, including three paintball sites and two clay pigeon shooting sites, for whom EJS is the only viable public transport hub; and
5. EJS will be the nearest railway station to the land at the former Wisley Airfield site which is proposed for the building of 2000 homes under Policy A35 of the draft Local Plan and if, despite the objections of many including East Horsley Parish Council, this proceeds, then significant numbers of residents will be taking one form of travel to EJS and then interchanging onto the railway.

I accordingly OBJECT to Policy E2 insofar as it fails to confer "public transport interchange" status on Effingham Junction Station.

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

Attached documents:
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There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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 E2

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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: PSLPP16/1985  **Respondent:** 15256705 / R.V. Vickers  **Agent:**

<table>
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There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

**Attached documents:**

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### Comment ID: PSLPP16/2000  **Respondent:** 15256833 / C J Vickers  **Agent:**

<table>
<thead>
<tr>
<th><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> ( )</th>
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<td><strong>1. I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)</strong></td>
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Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
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Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:

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**Comment ID:** pslp171/1056  **Respondent:** 15264065 / Roshan Bailey  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy E2

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

I support the removal of Wanborough from the transport intersections definition.

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

Attached documents:

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**Comment ID:** PSLPP16/14928  **Respondent:** 15265377 / Emma Thompson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

I object to the employment strategy and impact on Garlicks Arch (A43) (Policies E2 and E5)

The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable.

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

Attached documents:

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**Comment ID:** PSLPP16/2274  **Respondent:** 15275009 / Compton Parish Council (Fiona Curtis)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

We object to policy E2 location for new employment floor space. We object to the policy of expanding the Research Park onto Blackwell Farm and I do not believe there are exceptional circumstances to justify incursion into this permanent and high quality area of Green Belt. The Surrey Research Park currently extends to 65,000 sq m. There is already granted consent to expand to a further 9,000 sq m (14%) The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis. The ELNA 2015 calculated annual floor space demand is 0.7%. The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period. The necessary growth in floor space over the plan period is...
therefore 17 years x 0.7% = 11.9%. There is currently 14% expansion space already available. The proposal by GBC to expand the 65,000 sq m by 9,000 sq m (existing allocation) with an additional 35,000 sq m amounts to an increase of 67% of the Research Park which is not required. The Research Park is currently developed at a density of 25% plot ratio. The majority of existing buildings are 2 stories giving a developed floor space plot ratio of 12.5%. The existing Research Park has the opportunity to markedly increase its density without infringing any Green Belt land nearby. Any density increase would be cost effective for the use of all existing infrastructure and would also have the potential to match the existing densities of existing academic buildings on the university campus which are three to four times higher. Together with the existing expansion of 14% through existing consents and the opportunity to increase its density the Research Park has ample capacity to expand to embrace new demand for B1b uses linked to the university. A preferred location for increased B1a and B1b space would be in the Town Centre close to housing and a convenient transport hub.

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

Attached documents:

Comment ID: PSLPP16/18675  Respondent: 15278465 / Chris Wright  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

1. I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:

Comment ID: PSLPP16/2561  Respondent: 15284993 / Samantha Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

1. I object to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

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There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:
Comment ID: PSLPP16/2576  Respondent: 15285121 / Audrey Boughton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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: PSLPP16/2591  Respondent: 15285345 / Mike Boughton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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 no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:

Comment ID: PSLPP16/2710  Respondent: 15296545 / Catherine Lees  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

There is no need for new industrial sites at Garlick's Arch (A43). There is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000 sq m proposed. That site was removed from the Plan without any reasoning.

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

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Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:
POLICY E2 - Location for new employment floorspace

We object to this policy.

It would be more sensible to confine new office and research and development floor space to the urban Guildford area. We also oppose the policy of expanding the Research Park onto Blackwell Farm. 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?

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Policy E2: Location for new employment floorspace

I OBJECT to this policy

In my opinion all new office and research and development (use Class B1a and B1b) floor space should be within Guildford town centre. I do not support the policy of expanding the Research Park onto Blackwell Farm and we do not believe there are exceptional circumstances 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?

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<th>Agent:</th>
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Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:
Comment ID: PSLPP16/2981  Respondent: 15304929 / Rosemary Wood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

I OBJECT to the location for new employment floorspace.

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:

Comment ID: PSLPP16/3015  Respondent: 15312769 / Norah Johnson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

1. I object to the employment strategy and impact at Garlick’s Arch (A43) (Policies E2 and E5)

There is no need for new industrial sites at Garlick’s Arch (A43). There is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000 sq m proposed. That site was removed from the Plan without any reasoning.

Furthermore the development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been there for decades, employing local people and are therefore clearly sustainable.

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

Attached documents:

Comment ID: PSLPP16/3030  Respondent: 15312961 / Alison Johnson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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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I object to POLICY E2 - Location for new employment floorspace

- It would be more sensible to confine all new office and research and development (use Class B1a and B1b) floor space to Guildford town centre.
- I oppose the policy of expanding the Research Park onto Blackwell Farm. 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: PSLPP16/3516   Respondent: 15321217 / Sally Rule   Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

I object to the employment strategy and impact on Garlicks Arch (A43) (Policies E2 and E5)

The development will result in the loss sustainable existing successful businesses, which have been employing local people over many decade

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

Attached documents:

Comment ID: PSLPP16/3151   Respondent: 15323041 / Jane Doherty   Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

Under this policy, areas within 500 meters of a "public transport interchange" play a key role.

Proposals for new office and research and development floorspace are to be directed to firstly Guildford town centre and then to areas within 500 meters of a public transport interchange ("PTI").

East Horsley has two railway stations, Horsley Station and Effingham Junction Station, but currently the draft Local Plan only proposes that Horsley Station should have PTI status.

The explanation given at 4.4.17 for Effingham Junction Station ("EJS") not enjoying this status is that either it is located within the Green Belt, or it is within an AONB or it is isolated away from the village or centre. It is not clear which of these applies to this particular station, but we believe strongly that none apply and that there is a strong case for EJS deserving PTI status in the same way as Horsley Station.
I will deal firstly with the three alternative reasons given for EJS not supposedly qualifying as a PTI.

Firstly there is the Green Belt aspect. This is not logical since if location within the Green Belt were determinative, this would mean that Horsley Station would also fail to gain PTI status.

Also the draft Local Plan proposes elsewhere at Policy P2 that the whole of East Horsley, including both Horsley Station and EJS, should be inset from the Green Belt. It will be seen elsewhere in these comments that I object strongly to this proposal, but the point remains that if location within the Green Belt were a valid reason for not being given PTI status, the Local Plan itself makes it clear that under Policy P2 this will not apply in the case of both Horsley Station and EJS.

Secondly EJS is not located in an AONB. EJS is within the envelope of the village settlement and will remain as such under the draft Local Plan.

Thirdly EJS is not "isolated" or "away from the village centre."

Effingham Junction (the area immediately south and west of EJS, served by respectively Forest Road south of the railway bridge and Old Lane) may not have the extensive shopping parades enjoyed by East Horsley's two other centres (Station Parade and Bishopsmead Parade) but it is a thriving community with a significant population and also a significant number of active and successful employment floorspaces and sites.

These include in Forest Road a general store (Forest Road General Store), a car sales and repair business (PJB Car Sales/The Body Shop), a dental health centre and chiropractic clinic (Mortiboys) and on Horsley Road, Cedar Garden Centre, Royce Turf and Irrigation and at the Newmarsh Farm site, a number of businesses including Richmonds Horse Transport, Braye Hydraulic Repairs and TIS Surfacing Ltd.

It is therefore vital that the Local Plan's economy policies affecting the area protect these spaces and sites and create conditions for their sustainable growth and hence job creation.

Since all or most of these businesses are located within 500 meters of EJS, Policy E2 would be an invaluable driver for such growth which could play a major role in ensuring that Effingham Junction maintained and enhanced its position as East Horsley's "third centre" for homes and jobs. On the other hand, to exclude EJS from PTI status could very well stifle its sustainable development and condemn it to a future as a dormitory "backwater" of East Horsley.

It is also counter-intuitive in the extreme to refuse EJS "PTI" status. This is for the simple reason that EJS is clearly a "public transport interchange" as that term would be normally understood. This is for the following reasons:

- as the name "Effingham Junction" indicates, EJS is at an important junction and The railway line from Guildford splits here into two lines which take different routes into London, so many London-bound passengers will change trains here;

EJS serves not only the Effingham Junction area, but also the many residents of Effingham and Little Bookham for whom EJS is far closer than Bookham Station;

- EJS also serves the many residents of the Cobham area for whom EJS is far closer than Cobham and Stoke d'Abernon station EJS also serves the residents of Ockham and Ripley;
• EJS also serves the considerable numbers who visit local leisure activity sites, including three paintball sites and two clay pigeon shooting sites, for whom EJS is the only viable public transport hub; and

• EJS will be the nearest railway station to the land at the former Wisley Airfield site which is proposed for the building of 2000 homes under Policy A35 of the draft Local Plan and if, despite the objections of many including East Horsley Parish Council, this proceeds, then significant numbers of residents will be taking one form of travel to EJS and then interchanging onto the railway.

I accordingly OBJECT to Policy El insofar as it fails to confer "public transport interchange " status on Effingham Junction Station.

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

Attached documents:

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Comment ID: PSLPP16/3179  Respondent: 15323841 / Claire Parker  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

12. I object to the employment strategy and impact at Garlick’s Arch (A43) (Policies E2 and E5)

There is no need for new industrial sites at Garlick’s Arch (A43). There is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000 sq m proposed. That site was removed from the Plan without any reasoning.

Furthermore the development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been for there decades employing local people and are therefore clearly sustainable.

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

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Comment ID: PSLPP16/3260  Respondent: 15326465 / James Parker  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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?
1. The University regards Policy E2 relating to the location of new employment space and the sequential test to be flawed and recommends that the Research Park be treated in the same way as the Town Centre.

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

Attached documents:

Comment ID: PSLPP16/3314  
Respondent: 15327905 / Julia Cook  
Agent:

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

POLICY E2 - Location for new employment floor space

I OBJECT. It would be more sensible to confine all new office and research and development (use Class B1a and B1b) floor space to Guildford town centre. I oppose the policy of expanding the Research Park onto Blackwell Farm. 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: PSLPP16/3437  
Respondent: 15340929 / Claire Smylie  
Agent:

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

I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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<th>Respondent: 15345281 / Alexandra Murphy</th>
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<th>Comment ID: PSLPP16/3785</th>
<th>Respondent: 15348033 / Peter Nicholas</th>
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1. I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:

Comment ID: PSLPP16/13646  Respondent: 15349281 / Steve Aptel  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
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: pslp171/198  Respondent: 15349281 / Steve Aptel  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:

Comment ID: PSLPP16/4036  Respondent: 15352065 / Daniel Sinclair  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The proposal not to grant Effingham junction PTI status is baffling since the very arguments used to further Horsley stations claims are used against Effingham Junction. EJ plans just as an important role and is far more accessible than Horsley and should have PTI status.

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

Attached documents:

Comment ID: pslp171/3497  Respondent: 15355361 / Jennifer Brockless  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy E2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

4.4.23a A potential site for a Waste Management Facility is mentioned (tucked away in the hope that it will not be noticed?). It is hardly a sensible option to plan to build so many houses and then put a Waste Disposal Site so close. With even the best of intentions these sites smell (especially in hot weather and with global warming happening, we are promised more heat) and to place them in residential areas is not reasoned. It would also be within 'striking distance' of the RHS Wisley - a world renowned enterprise - which would be highly sensitive to any malfunction of a waste disposal unit.

It is not worth the risk of the possible damage to people's physical and mental health to use this site.

It seems that far from taking into consideration the responses of the communities to the original local plan you have perversely altered the plan to build even more housing and industrial development.

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

Attached documents:

Comment ID: PSLPP16/4159  Respondent: 15356801 / Clare Harlow  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

6. I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:
Policies E1,E2,E5: I object to.

The first two fly in the face of the fact that a Brown Field site already exists to the south of Burnt Common, yet the GB site is recommended to be used for a mix of warehousing, light industrial and general industrial for sustainable employment, next to what is also proposed as a residential site? The latter is still not necessary IMO and it follows that the former is not either; why? Because it can be housed along with over 100 houses if necessary, on the BF site referred to above. So why create an unnecessary strategic employment site on GB, when a BF site exists nearby to accommodate this growth?

It has to be noted further, that the development of Garlick’s Arch would result in the loss of 4 established businesses employing dozens of local people; so IMO this policy is not working in this instance, it is destructive and wasteful as opposed to economic and productive. This is a direct contradiction of the aim of policy E1; again bizarre?

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

Attached documents:

1. POLICY E2

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:
6. **I object to the location for new employment floorspace at Garlick’s Arch Site A43 (Policy E2)**

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:

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**Comment ID:** PSLPP16/4612  **Respondent:** 15370593 / A Gee  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

1. **POLICY E2**

I object to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of 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:** PSLPP16/4710  **Respondent:** 15372417 / P. Mew  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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: PSLPP16/4819  Respondent: 15377953 / cctvtraining.com ltd (Gordon Tyerman)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

POLICY E2 Location for new employment floorspace

GROUNDS FOR OBJECTION We are of the opinion that all new office and research and development (use Class B1a and B1b) floor space should be within Guildford town centre. We do not support the policy of expanding the Research Park onto Blackwell Farm and we do not believe there are exceptional circumstances 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: PSLPP16/4850  Respondent: 15379969 / Teresa Britton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

1. POLICY E2

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

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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: PSLPP16/5130</th>
<th>Respondent: 15386017 / Gareth Sinnett</th>
<th>Agent:</th>
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<tbody>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy E2</td>
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**I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)**

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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**Attached documents:**

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<th>Comment ID: PSLPP16/5149</th>
<th>Respondent: 15386337 / Edna Slater</th>
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**I OBJECT to the location for new employment floorspace (Policy E2)**

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt. Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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**Attached documents:**
circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

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

Attached documents:

Comment ID: PSLPP16/5170  Respondent: 15388385 / Linda Bagnall  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

** I object to the employment strategy and impact on Garlicks Arch (A43) (Policies E2 and E5)

The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable.

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

Attached documents:

Comment ID: PSLPP16/5190  Respondent: 15388673 / Bruce Stewart  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY E2

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
12. I object to the employment strategy and impact at Garlick’s Arch (A43) (Policies E2 and E5)

There is no requirement for a new industrial site at Garlick’s Arch (A43). There is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000 sq m proposed. That site was removed from the Plan without any reasoned argument or consultation.

Furthermore the development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been on site for many decades employing local people and are therefore clearly sustainable. These businesses do not wish to relocate to new premises.

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

Attached documents:

1. POLICY E2

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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1. I object to the employment strategy and impact at Garlick’s Arch (A43) (Policies E2 and E5)

The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been for there decades employing local people and are therefore clearly sustainable.

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

Attached documents:

Comment ID: PSLPP16/5356  Respondent: 15390401 / William Stewart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

1. POLICY E2

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Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:

Comment ID: PSLPP16/5388  Respondent: 15390785 / Francesca Molossi- Murphy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

I OBJECT to the location for new employment floorspace at Garlick’s Arch - Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.
### Comment ID: PSLPP16/5441  Respondent: 15397953 / Gillian Dobson  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

1. I object to the employment strategy and impact at Garlick's Arch (A43) (Policies E2 and E5)

   There is no need for new industrial sites at Garlick's Arch (A43). There is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000 sq m proposed. That site was removed from the Plan without any reasoning.

   Furthermore the development at Garlick's Arch would result in the loss of four existing successful rural businesses, which have been for there decades employing local people and are therefore clearly sustainable.

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### Comment ID: PSLPP16/5472  Respondent: 15398657 / Kim Roberts  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

1. POLICY E2

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   I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

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   There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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### Comment ID: PSLPP16/5514  Respondent: 15399041 / Sue Ely  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

I object to the location for new employment floor space at Garlick’s Arch - Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, 82 and 88) floor space will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floor space to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:

Comment ID: PSLPP16/5649  Respondent: 15405857 / Raymond Mackay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

1. POLICY E2

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

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

Attached documents:

Comment ID: PSLPP16/5676  Respondent: 15406017 / Eleanor Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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:
after the last consultation, to use brown field sites for housing have been ignored. This is of such importance that I find that this complete lack of attention to this point is insulting.

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

Attached documents:

Comment ID: PSLPP16/5902  Respondent: 15408513 / Brian Rawling  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

6. I object to the location for new employment floorspace at Garlick's Arch - Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick's Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:

Comment ID: PSLPP16/5911  Respondent: 15412001 / S Richardson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

I strongly object to the Development at Garlick Arch, the development and the major development at Gosden Hill. The Clandons are villages separated from the sprawl of Guildford by the Green Belt land at Gosden Hill.

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

Attached documents:

Comment ID: PSLPP16/6000  Respondent: 15420833 / Marjorie Moss  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

I OBJECT to the location for new employment floorspace.
I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

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

Attached documents:
**Comment ID:** PSLPP16/6058  **Respondent:** 15422529 / David Roberts  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

1. **POLICY E2**

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:

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**Comment ID:** PSLPP16/6097  **Respondent:** 15422849 / Ryan Clarke and Lauren Emberson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

1. I object to the employment strategy and impact at Garlick’s Arch (A43) (Policies E2 and E5)

There is no need for new industrial sites at Garlick’s Arch (A43). There is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000 sq m proposed. That site was removed from the Plan without any reasoning. Furthermore the development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been for there decades employing local people and are therefore clearly sustainable.

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

Attached documents:

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**Comment ID:** PSLPP16/6127  **Respondent:** 15424865 / Robert Victor Ewen  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

I OBJECT to the location for new employment floorspace at Garlick's Arch - Site A43
Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

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6. POLICY E2

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<th>Respondent: 15445793 / Jackie Withers</th>
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I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

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Attached documents:

Comment ID: PSLPP16/7387  Respondent: 15448449 / Carol Roberts  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the location for new employment floorspace (Policy E2)

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

Attached documents:

Comment ID: PSLPP16/7632  Respondent: 15450817 / Audrey Gachen  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to POLICY E2 - Location for new employment floorspace

• It would be more sensible to confine all new office and research and development (use Class B1a and B1b) floor space to Guildford town centre.
• I oppose the policy of expanding the Research Park onto Blackwell Farm. 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: PSLPP16/7701  Respondent: 15451457 / Camilla Bell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

I object to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:

Comment ID: PSLPP16/7719  Respondent: 15451713 / Gaby Attwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

I OBJECT to the location for new employment floor space at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floor space will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floor space to be located at Garlick’s Arch, when just to the south, at Burnt Common, there is existing industrial development, with surplus land that could accommodate further development of 7,000 sq m.

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

Attached documents:

Comment ID: PSLPP16/7733  Respondent: 15451905 / Jonathan Withers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7756  Respondent: 15451969 / Rosie Lee  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:

Comment ID: PSLPP16/15096  Respondent: 15454945 / Claire Cassar  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

The provision of new industrial sites at Garlick’s Arch (A43) is not required. Existing brownfield industrial site at Burnt Common would provide a viable alternative, with capacity to accommodate the 7,000 sq m proposed.

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

Attached documents:

Comment ID: PSLPP16/7986  Respondent: 15457505 / Julie Gray  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

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Comment ID: PSLPP16/8255  Respondent: 15462785 / Thomas McMinn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

6.1 OBJECT to the location for new employment floor space at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floor space will be directed to the Industrial Strategic Employment Sites.

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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: PSLPP16/8353  Respondent: 15464673 / Trudy Grey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

6. POLICY E2

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

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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 the location for new employment floor space at Gartick's Arch - Site A43 (Policy E2)

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Under this policy, areas within 500 meters of a "public transport interchange" play a key role.

Proposals for new office and research and development floorspace are to be directed to firstly Guildford town centre and then to areas within 500 meters of a public transport interchange ("PTI").

East Horsley has two railway stations, Horsley Station and Effingham Junction Station, but currently the draft Local Plan only proposes that Horsley Station should have PTI status.

The explanation given at 4.4.17 for Effingham Junction Station ("EJS") not enjoying this status is that either it is located within the Green Belt, or it is within an AONB or it is isolated away from the village or centre. It is not clear which of
these applies to this particular station, but we believe strongly that none apply and that there is a strong case for EJS deserving PTI status in the same way as Horsley Station.

I will deal firstly with the three alternative reasons given for EJS not supposedly qualifying as a PTI.

Firstly there is the Green Belt aspect. This is not logical since if location within the Green Belt were determinative, this would mean that Horsley Station would also fail to gain PTI status.

Also the draft Local Plan proposes elsewhere at Policy P2 that the whole of East Horsley, including both Horsley Station and EJS, should be inset from the Green Belt. It will be seen elsewhere in these comments that I object strongly to this proposal, but the point remains that if location within the Green Belt were a valid reason for not being given PTI status, the Local Plan itself makes it clear that under Policy P2 this will not apply in the case of both Horsley Station and EJS.

Secondly EJS is not located in an AONB. EJS is within the envelope of the village settlement and will remain as such under the draft Local Plan.

Thirdly EJS is not "isolated" or "away from the village centre."

Effingham Junction (the area immediately south and west of EJS, served by respectively Forest Road south of the railway bridge and Old Lane) may not have the extensive shopping parades enjoyed by East Horsley's two other centres (Station Parade and Bishopsmead Parade) but it is a thriving community with a significant population and also a significant number of active and successful employment floorspaces and sites.

These include in Forest Road a general store (Forest Road General Store), a car sales and car repair business (PJB Car Sales/The Body Shop), a dental health centre and chiropractic clinic (Mortiboys) and on Horsley Road, Cedar Garden Centre, Royce Turf and Irrigation and at the Newmarsh Farm site, a number of businesses including Richmonds Horse Transport, Braye Hydraulic Repairs and TTS Surfacing Ltd.

It is therefore vital that the Local Plan's economy policies affecting the area protect these spaces and sites and create conditions for their sustainable growth and hence job creation.

Since all or most of these businesses are located within 500 meters of EJS, Policy E2 would be an invaluable driver for such growth which could play a major role in ensuring that Effingham Junction maintained and enhanced its position as East Horsley's "third centre" for homes and jobs. On the other hand, to exclude EJS from PTI status could very well stifle its sustainable development and condemn it to a future as a dormitory "backwater" of East Horsley.

It is also counter-intuitive in the extreme to refuse EJS "PTI" status. This is for the simple reason that EJS is clearly a "public transport interchange" as that term would be normally understood. This is for the following reasons:

• as the name "Effingham Junction" indicates, EJS is at an important junction and interchange. The railway line from Guildford splits here into two lines which take different routes into London, so many London-bound passengers will change trains here;

• EJS serves not only the Effingham Junction area, but also the many residents of Effingham and Little Bookham for whom EJS is far closer than Bookham Station;

• EJS also serves the many residents of the Cobham area for whom EJS is far closer than Cobham and Stoke d'Abernon station EJS also serves the residents of Ockham and Ripley;

• EJS also serves the considerable numbers who visit local leisure activity sites, including three paintball sites and two clay pigeon shooting sites, for whom EJS is the only viable public transport hub; and
• EJS will be the nearest railway station to the land at the former Wisley Airfield site which is proposed for the building of 2000 homes under Policy A35 of the draft Local Plan and if, despite the objections of many including East Horsley Parish Council, this proceeds, then significant numbers of residents will be taking one form of travel to EJS and then interchanging onto the

I object to Policy E2 insofar as it fails to confer “public transport interchange” status on Effingham Junction Station.

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

Attached documents:
I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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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: PSLPP16/10699  Respondent: 15504929 / William Scott  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the location for new employment floorspace at Garlick's Arch -Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:

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Comment ID: PSLPP16/11254  Respondent: 15570145 / Owen Eszeki  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy E2 - Location for New Employment Floorspace

I object to excessive development anywhere in the borough when brownfield sites area available.

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

Attached documents:

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Comment ID: PSLPP16/11257  Respondent: 15570209 / Emily Cross  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
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: PSLPP16/15293  **Respondent:** 15570817 / Tom Edelsten  **Agent:**

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

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of 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: PSLPP16/15296  **Respondent:** 15571201 / Zoe Dudgeon  **Agent:**

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

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

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

Attached documents:

Comment ID: PSLPP16/11780  Respondent: 15571617 / Bruce Garbutt  Agent:

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

POLICY E2 - Location for new employment floorspace

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. 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: PSLPP16/11523  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 the employment strategy and impact at Garlick’s Arch (A43) (Policies E2 and E5)
There is no need for new industrial sites at Garlick’s Arch (A43). There is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000 sq m proposed. That site was removed from the Plan without any reasoning.

Furthermore the development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been for there decades

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

Attached documents:

Comment ID: PSLPP16/11531  Respondent: 15571745 / Hazel Thompson  Agent:

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

I object to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)
There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. This certainly does not meet the ‘exceptional’ criteria required to build on the greenbelt.

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

**Attached documents:**

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<td>The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable</td>
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Attached documents:

Comment ID: PSLPP16/12205  Respondent: 15581665 / Laura Daboo  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

Attached documents:

Comment ID: PSLPP16/12207  Respondent: 15581761 / Peter Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.
Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:

---

Comment ID: PSLPP16/12342  Respondent: 15582593 / Dermot McMullan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

I OBJECT to the location for new employment floorspace (Policy E2)

It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:

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Comment ID: PSLPP16/12406  Respondent: 15583169 / Poul Jensen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.
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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:** PSLPP16/12466  **Respondent:** 15583585 / Josephine Rooke  **Agent:**

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

**I object to the employment strategy and impact on Garlick’s Arch (A43) (Policies E2 and E5)**

The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable.

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

**Attached documents:**

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**Comment ID:** PSLPP16/12467  **Respondent:** 15583617 / Deborah Gillam  **Agent:**

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

**I object to the employment strategy and impact on Garlick’s Arch (A43) (Policies E2 and E5)**

The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable.

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

**Attached documents:**

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**Comment ID:** PSLPP16/12504  **Respondent:** 15583809 / Nigel Stephenson  **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 employment strategy and impact at Garlick’s Arch (A43) (Policies E2 and E5)**
   
   There is no need for new industrial sites at Garlick’s Arch (A43). There is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000 sq m proposed. That site was removed from the Plan without any reasoning.
Furthermore the development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been for there decades employing local people and are therefore clearly sustainable.

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

**Attached documents:**

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**Comment ID:** PSLPP16/12558  **Respondent:** 15584161 / Alexandra Elson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

---

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

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

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There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

**Attached documents:**

---

**Comment ID:** PSLPP16/12564  **Respondent:** 15584161 / Alexandra Elson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

---

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

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone). Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3
& M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

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

Attached documents:

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Comment ID: PSLPP16/12638  Respondent: 15584833 / Maria Fort  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:

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Comment ID: PSLPP16/12655  Respondent: 15584961 / Helen Meredith  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY E2

I object to the location for new employment floorspace (Policy E2) as it would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. 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:

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Comment ID: PSLPP16/12764  Respondent: 15585601 / Sophie Corstin  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY E2

I object to the location for new employment floorspace (Policy E2) as it would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.
I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

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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? ( )

### POLICY E2: LOCATION OF EMPLOYMENT FLOORSPACE

I object to policy E2 location for new employment floor space.

I object to the policy of expanding the Research Park onto Blackwell Farm and I do not believe there are exceptional circumstances to justify incursion into this permanent and high quality area of Green Belt.

The Surrey Research Park currently extends to 65,000 sq m. There is already granted consent to expand to a further 9,000 sq m (14%).

The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis.

The ELNA 2015 calculated annual floor space demand is 0.7%.

The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period. The necessary growth in floor space over the plan period is therefore 17 years x 0.7% = 11.9%.

There is currently 14% expansion space already available.

The proposal by GBC to expand the 65,000 sq m by 9,000 sq m (existing allocation) with an additional 35,000 sq m amounts to an increase of 67% of the Research Park which is not required.

The Research Park is currently developed at a density of 25% plot ratio. The majority of existing buildings are 2 stories giving a developed floor space plot ratio of 12.5%.

The existing Research Park has the opportunity to markedly increase its density without infringing any Green Belt land nearby. Any density increase would be cost effective for the use of all existing infrastructure and would also have the potential to match the existing densities of existing academic buildings on the university campus which are three to four times higher.
Together with the existing expansion of 14% through existing consents and the opportunity to increase its density the Research Park has ample capacity to expand to embrace new demand for B1b uses linked to the university.

A preferred location for increased B1a and B1b space would be in the Town Centre close to housing and a convenient transport hub.

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

Attached documents:

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Comment ID: PSLPP16/12889  Respondent: 15587105 / John Downes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:

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Comment ID: PSLPP16/12905  Respondent: 15587137 / John Oliver  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

Policy E2

“The NPPF requires planning authorities to plan proactively to meet the development needs of business and support an economy fit for the 21st century. Paragraph 21 requires the Council to “support existing business sectors” and to “plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries”. This has already been done. It needs to go no futher. Just because there is a demand from profit-motivated organisations does not mean that the public sector has to respond – i.e. give way. The identified need at the University is for student accommodation. The land being sought for research development should be set aside for that accommodation and thereby ease the pressure on the Green Belt.

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

Attached documents:
Comment ID: PSLPP16/13020  Respondent: 15587361 / Aileen Creegan  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:

Comment ID: PSLPP16/13108  Respondent: 15587905 / Clare Claxton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

** I object to the employment strategy and impact on Garlicks Arch (A43) (Policies E2 and E5)

The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable.

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

Attached documents:

Comment ID: PSLPP16/13223  Respondent: 15588929 / Alex Hutchings  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

POLICY E2

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.
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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: PSLPP16/13287  
**Respondent:** 15589665 / Anna Worsley  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

1. I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:

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Comment ID: PSLPP16/13308  
**Respondent:** 15589889 / Keith Macdonald  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

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Comment ID: PSLPP16/13365  
**Respondent:** 15590241 / Claire Tallis  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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 employment strategy and impact at Garlick’s Arch (A43) (Policies E2 and E5)

There is no need for new industrial sites at Garlick’s Arch (A43). There is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000 sq m proposed. That site was removed from the Plan without any reasoning.

Furthermore the development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been for there decades employing local people and are therefore clearly sustainable.

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

Attached documents:

Comment ID: PSLPP16/13378  Respondent: 15590273 / Eunja Madge  Agent:

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

POLICY E2

I OBJECT to the location for new employment floor space (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floor space will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floor space to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:

Comment ID: PSLPP16/13462  Respondent: 15590593 / Johnathan Page  Agent:

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

I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.
There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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: PSLPP16/13799  Respondent: 15595681 / Willemien Downes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

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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: PSLPP16/13898  Respondent: 15598113 / David J. Blackbourn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

But believe that Policy E2 “Location for new employment floorspace” fails to realise that Guildford Town Centre is relatively insignificant in economic value added terms. The University Quarter provides three times as much economic gross value added as the Town Centre yet is prejudiced by 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: PSLPP16/13970  Respondent: 15598721 / Trevor Ottaway  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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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:** PSLPP16/14057  **Respondent:** 15601057 / Chris Vinall  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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I OBJECT to the location for new employment floorspace (Policy E2)

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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:** PSLPP16/14088  **Respondent:** 15601121 / Elspeth Anderson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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 this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14131</th>
<th>Respondent: 15601249 / Ann Barrass</th>
<th>Agent:</th>
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<tr>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14199  Respondent: 15601473 / Joseph Fort  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:

Comment ID: PSLPP16/14323  Respondent: 15602177 / Julia Hunt  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

I object to policy E2 location for new employment floor space I object to the policy of expanding the Research Park onto Blackwell Farm and I do not believe there are exceptional circumstances to justify incursion into this permanent and high quality area of Green BelThe Surrey Research Park currently extends to 65,000 sq m. There is already granted consent to expand to a further 9,000 sq m (14%)The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis.The ELNA 2015 calculated annual floor space demand is 0.7%.The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period. The necessary growth in floor space over the plan period is therefore 17 years x 0.7% = 11.9%.There is currently 14% expansion space already available.The proposal by GBC to expand the 65,000 sq m by 9,000 sq m (existing allocation) with an additional 35,000 sq m amounts to an increase of 67% of the Research Park which is not required.The Research
Park is currently developed at a density of 25% plot ratio. The majority of existing buildings are 2 stories giving a
developed floor space plot ratio of 12.5%. The existing Research Park has the opportunity to markedly increase its density
without infringing any Green Belt land nearby. Any density increase would be cost effective for the use of all existing
infrastructure and would also have the potential to match the existing densities of existing academic buildings on the
university campus which are three to four times higher. Together with the existing expansion of 14% through existing
consents and the opportunity to increase its density the Research Park has ample capacity to expand to embrace new
demand for B1b uses linked to the university. A preferred location for increased B1a and B1b space would be in the Town
Centre close to housing and a convenient transport hub

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

Attached documents:

Comment ID: PSLPP16/14407  Respondent:  15602561 / Jonathan Clark  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

I object to the employment strategy and impact at Garlick’s Arch (A43) (Policies E2 and E5)

There is no need for new industrial sites at Garlick’s Arch (A43). There is an existing brownfield industrial site at Burnt
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Furthermore the development at Garlick’s Arch would result in the loss of four existing successful rural businesses,
which have been for there decades employing local people and are therefore clearly sustainable.

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

Attached documents:

Comment ID: PSLPP16/14472  Respondent:  15603297 / Rony Douek  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
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- I object to the employment strategy and impact on Garlicks Arch (A43) (Policies E2 and E5). The development will
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14545  Respondent:  15603489 / Simon Pitt  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
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Attached documents:

Comment ID: PSLPP16/14619   Respondent: 15603905 / Michael Douek   Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
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: PSLPP16/14660   Respondent: 15604289 / Lesley Pitt   Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
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: PSLPP16/14671  Respondent: 15604449 / Annabel Curling  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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Attached documents:

Comment ID: PSLPP16/14728  Respondent: 15606561 / Rebecca Warwick  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

** I object to the employment strategy and impact on Garlick Arch (A43) (Policies E2 and E5)

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Attached documents:

Comment ID: PSLPP16/14729  Respondent: 15606593 / James Green  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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<th>Comment ID: PSLPP16/14731</th>
<th>Respondent: 15606657 / Kim Hopwood</th>
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<th>Comment ID: PSLPP16/14800</th>
<th>Respondent: 15607425 / Louise Quy</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>There is no discernable need for new industrial sites at Garlick's Arch (A43) because there is already an existing brownfield industrial site located in Burnt Common that could easily accommodate the 7,000sq m proposed - why was this site removed from the Plan with no reason given?</td>
<td>I use the current businesses and strongly object to their livelihoods being put in jeopardy by this Plan. They have been trading for many years, employ local people and are clearly sustainable.</td>
<td></td>
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</tbody>
</table>

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

Attached documents:

Comment ID: PSLPP16/14807  Respondent: 15607553 / Penelope Gillmore  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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: PSLPP16/14827  Respondent: 15607681 / Robin Hopwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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: PSLPP16/14870  Respondent: 15608225 / Louise Wickham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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<th>Comment ID: PSLPP16/14869</th>
<th>Respondent: 15608289 / Olivia Marshall</th>
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<th>Comment ID: PSLPP16/14892</th>
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<th>Comment ID: PSLPP16/14912</th>
<th>Respondent: 15608801 / Beth Fuller</th>
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**Comment ID:** PSLPP16/15120  
**Respondent:** 15610433 / Clare Porter  
**Agent:**

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**Comment ID:** PSLPP16/15119  
**Respondent:** 15610465 / Tess Corlett  
**Agent:**

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**Comment ID:** PSLPP16/15130  
**Respondent:** 15610529 / Mark Ransome  
**Agent:**
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<th>Respondent: 15611105 / Ramsey Shubbar</th>
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Attached documents:

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Comment ID: PSLPP16/15596  Respondent: 15617185 / Michelle Mitchell  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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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: PSLPP16/15624  Respondent: 15618305 / Lawrence Claridge  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

Attached documents:

Use the brownfield site at Burnt Common for industrial sites not Garlick's Arch. Shame on you for suggesting destroying our natural environment in the name of profit. We would all suffer if Garlick's arch were urbanised.
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy E2 - Location for New Employment Floor-space

I object to development in the rural areas of the Greenbelt when Guildford brownfield sites area available.

I object to policy E2 location for new employment floor space I object to the policy of expanding the Research Park onto Blackwell Farm and I do not believe there are exceptional circumstances to justify incursion into this permanent and high quality area of Green Belt.

The Surrey Research Park currently extends to 65,000 sq m. There is already granted consent to expand to a further 9,000 sq m (14%) The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from Voa analysis. The ELNA 2015 calculated annual floor space demand is 0.7%. The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period. The necessary growth in floor space over the plan period is therefore 17 years x 0.7% = 11.9%. There is currently 14% expansion space already available. The proposal by GBC to expand the 65,000 sq m by 9,000 sq m (existing allocation) with an additional 35,000 sq m amounts to an increase of 67% of the Research Park which is not required. The Research Park is currently developed at a density of 25% plot ratio. The majority of existing buildings are 2 stories giving a developed floor space plot ratio of 12.5%. The existing Research Park has the opportunity to markedly increase its density without infringing any Green Belt land nearby. Any density increase would be cost effective for the use of all existing infrastructure and would also have the potential to match the existing densities of existing academic buildings on the university campus which are three to four times higher. Together with the existing expansion of 14% through existing consents and the opportunity to increase its density the Research Park has ample capacity to expand to embrace new demand for B1a and B1b uses linked to the university. A preferred location for increased B1a and B1b space would be in the Town Centre close to housing and a convenient transport hub.

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

Attached documents:
I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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:** PSLPP16/16357  **Respondent:** 15641281 / Paula Redmond  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

I object to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

Garlick’s Arch is Green Belt land and should not be developed or built on or otherwise when there is a nearby and more suitable brownfield site available.

Add about woodland and wildlife here if relevant

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

Attached documents:

**Comment ID:** PSLPP16/16770  **Respondent:** 15650369 / Stephanie Dean  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

POLICY E2 - Location for new employment floorspace

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. 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:** PSLPP16/16801  **Respondent:** 15652833 / Don Babington  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:

Comment ID: PSLPP16/17115  Respondent: 15666625 / Anna Ruddy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

1. I OBJECT to the location for new employment floorspace at Garlick's Arch -Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick's Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:

Comment ID: PSLPP16/17392  Respondent: 15682465 / Nick Beesly  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

Economic Policies: Iam in support of Policy El "Sustainable employment” but believe that Policy E2 "Location for new employment floorspace” fails to realise that Guildford Town Centre is relatively insignificant in economic value added terms. The University Quarter provides three times as much economic gross value added as the Town Centre yet is prejudiced by this policy. I am supportive of Policy E4 "Surrey Research Park”, Policy ES "Rural Economy” and Policy E6 "The leisure and visitor experience” but caution that Policy E7 "Guildford Town Centre” could lead to overdevelopment of the Town Centre.

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

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17477</th>
<th>Respondent: 15687201 / Mandy Cox</th>
<th>Agent:</th>
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<tbody>
<tr>
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<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>
<td></td>
</tr>
</tbody>
</table>

I object to the employment strategy and impact at Garlick’s Arch (A43) (Policies E2 and E5)

There is no need for new industrial sites at Garlick’s Arch (A43). There is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000 sq m proposed. That site was removed from the Plan without any reasoning.

Furthermore the development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been for there decades employing local people and are therefore clearly sustainable.

**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: PSLPP16/17604</th>
<th>Respondent: 15688481 / Sally Lescher</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> ( ), <strong>is Sound?</strong> ( ), <strong>is Legally Compliant?</strong> ( )</td>
<td></td>
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</table>

I object to policy E2 location for new employment floor space

I object to the policy of expanding the Research Park onto Blackwell Farm and I do not believe there are exceptional circumstances to justify incursion into this permanent and high quality area of Green Belt.

The Surrey Research Park currently extends to 65,000 sq m. There is already granted consent to expand to a further 9,000 sq m (14%)

The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis.

The ELNA 2015 calculated annual floor space demand is 0.7%.

The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period. The necessary growth in floor space over the plan period is therefore 17 years x 0.7% = 11.9%.

There is currently 14% expansion space already available.

The proposal by GBC to expand the 65,000 sq m by 9,000 sq m (existing allocation) with an additional 35,000 sq m amounts to an increase of 67% of the Research Park which is not required. The Research Park is currently developed at a density of 25% plot ratio.

The majority of existing buildings are 2 stories giving a developed floor space plot ratio of 12.5%.

The existing Research Park has the opportunity to markedly increase its density without infringing any Green Belt land nearby. Any density increase would be cost effective for the use of all existing infrastructure and would also have the potential to match the existing densities of existing academic buildings on the university campus which are three to four times higher.
Together with the existing expansion of 14% through existing consents and the opportunity to increase its density the Research Park has ample capacity to expand to embrace new demand for B1b uses linked to the university.

A preferred location for increased B1a and B1b space would be in the Town Centre close to housing and a convenient transport hub.

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

**Attached documents:**

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**Comment ID:** PSLPP16/18423  **Respondent:** 15724353 / Arvnid Parmar  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floor space will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floor space to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

**Attached documents:**

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**Comment ID:** PSLPP16/18469  **Respondent:** 15724673 / Matthew Bell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

I object to the employment strategy and impact on Garlick’s Arch (A43) (Policies E2 and E5)

The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable.

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

**Attached documents:**

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**Comment ID:** PSLPP16/18473  **Respondent:** 15724081 / Talei Fawcett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

I object to the employment strategy and impact on Garlicks Arch (A43) (Policies E2 and E5)

The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable.

**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 employment strategy and impact on Garlicks Arch (A43) (Policies E2 and E5)

The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable.

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

Attached documents:

Comment ID: PSLPP16/18508  Respondent: 15725409 / Nicholas Ward  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:

Comment ID: pslp171/1247  Respondent: 15805601 / Guildford Greenbelt Group (Sir or madam)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E2

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

We object to the change in policy E2 under paragraph 4.4.23a in relation to development involving waste management facilities to be directed to the Industrial Strategic Employment Sites.
- This fails to provide sufficient public consultation in relation to access and traffic flows
- This fails to provide sufficient public consultation in relation to unpleasant aspects of waste management

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

Attached documents:

Comment ID: PSLPP16/15560  Respondent: 15977889 / Charles Kimpton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
OBJECT. There are no exceptional circumstances to justify B1a & B1a expansion into Blackwell Farm area of Green Belt

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

Attached documents:

Comment ID: pslp171/929  Respondent: 17164033 / David Roberts  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy E2

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

1.  **Policy E1, E2: employment land**

I OBJECT that too much land in the urban centre in the revised Plan is allocated for retail or commercial use. Too much of *that*, in turn, is designated for land-hungry retail of low-value-added commercial floorspace such as warehousing. This will:

- Discourage the building of much-needed housing (especially low-cost homes) in convenient locations (especially urban brownfield sites) in accordance with national trends and Government policy;
- Deter the promotion of high-value-added businesses more in keeping with the declared aims of the local authorities and Enterprise Partnership;
- Aggravate town-centre traffic problems and the current decay of independent high-street businesses that reflects a pronounced, national shift away from town-centre shopping towards online trade; and
- Encroach needlessly on the Green Belt at inappropriate sites such as Burnt Common.

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

Attached documents:

Comment ID: pslp171/169  Respondent: 17240193 / Anita Aptel  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy E2

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

I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:
I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:
Policy E2: Locations for new employment floorspace

This representation is made on behalf of BOC Limited who is a major employer both across the UK and within Guildford specifically as their UK headquarters are based on the Surrey Research Park.

BOC is strongly supportive of the general thrust of the plan and specifically welcome the designation of the Surrey Research Park (SRP) as a Strategic Employment Site under policy E1, the extension of SRP under policy E4 and the job targets set out across the other employment policies. These clearly reflect the evidence base (including the ELNA 2017) which confirms the importance of SRP to the local economy.

However, there are elements of Policy E2: locations of new employment floorspace which BOC are concerned are at risk of being found 'unsound'.

Whilst criterion (2) confirms that 'the sequential approach does not apply to proposed employment floorspace included in the Site allocations in the Local Plan', such as the extension to the SRP under policy E4 (A26), the policy as currently worded would require any site wide employment redevelopment proposals for existing Sites within the SRP to meet the sequential test.

BOC is concerned that this unnecessarily restricts the expansion and investment plans of those businesses already located on SRP, who are equally allocated within the proposed Strategic Employment Site under draft policy E2. This would be contrary to the NPPF, notably the following objectives:

1. -building a strong, competitive economy is a key policy objective and there is a clear commitment to ‘securing economic growth in order to create jobs and prosperity, building on the country’s inherent strengths’ (para 18 – 22);
2. -‘Planning should operate to encourage and not act as an impediment to sustainable growth’. (Para. 19);
3. -investment in business should not be ‘over-burdened by the combined requirements of planning policy expectations’ (para. 21); and,
4. -local planning authorities are expected to ‘support existing business sectors, taking account of whether they are expanding or contracting’, whilst ensuring that policies are ‘flexible enough to accommodate needs not anticipated in the plan and to allow for a rapid response to changes in economic circumstances’ (para. 21, bullet point 3).

BOC is also concerned at the definition of transport interchanges at paragraph 4.4.15 which limits the definition to ‘rail stations and bus stations within the urban areas or in close proximity to the district centres and Strategic Employment Sites.’ They are concerned that this definition has overlooked the combined public transport node of the Royal Surrey County Hospital, the SRP and the Manor Park Campus which are served by a combination of 11 bus services of which three run at least every 20 minutes in the AM peak including the following:

- route 4
- route 5
- route 14
- route 17/17A
- route 26
- route 27
- route 36/37
- route 38
- route 520
- route 697
- route PT5

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

BOC request that criterion 2 to policy E2 is amended to confirm that the sequential approach will not apply to proposals for the site wide redevelopment or intensification of existing employment premises within the defined strategic employment sites (including the SRP).

BOC request that the definition of public transport interchanges at paragraph 4.4.15 is amended to include the public transport node of the Royal Surrey County Hospital / Surrey Research Park / Manor Park Campus.

Attached documents:

Comment ID: pslp171/959  Respondent: 17323265 / Simon Owen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E2

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

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:

Comment ID: pslp171/1400  Respondent: 17382113 / T J Lindsay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E2

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

Land for Employment Use - E1, E2

Too much potential development land within the town centre is allocated for retail or commercial development instead of for housing. I object to this. It is not logical. It is against national trends and will serve to make the shortage of affordable housing and the appalling traffic and movement problems worse.

The Burnt Common site is not suited to heavy industry and it is in the Green Belt.

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

Attached documents:
POLICY E2 - Location for new employment floorspace

3.33 The first part of policy E2 sets the sequential approach which needs to be followed to determine where new office and research & development floorspace will be located. Guildford town centre has given preference to areas within 500m of a transport interchange, and then to strategic employment sites.

3.34 The second part of policy E2 has been changed to now state that the sequential approach does not apply to proposed floorspace included in the site allocations in the Local Plan.

3.35 The inclusion of this part of the policy significantly undermines the overall strategy for the provision of floorspace in the borough. The addition of this wording is in direct contradiction to the first part of the policy which directs development to the town centre. It now demonstrates that there has been little rationale to including employment space on the strategic allocations other than to meet the need specified in policy E1.

3.36 Paragraph 4.416 within the definitions section of policy E2 states that:

*When developed, the two new rail stations, Guildford East (Merrow) and Guildford West (Park Barn), will each be treated as a transport interchange.*

3.37 GVG has considered the impact of Guildford West (Park Barn) being considered as a transport interchange. This would reinforce the rationale of GVG promoting the provision of high density, residential units on Woodbridge Meadows with provision of health, retail and leisure facilities alongside the amenity of the River Wey navigation. It is the most sustainable and arguably deliverable site in close proximity to the town centre where the freehold is mostly owned by the council. GVG identifies the ability to provide 1,300 dwellings at this location in addition to 5,000 sq m of other uses including retail, health care and sports facilities.

3.38 GVG has also considered the impact of the proposed Guildford East (Merrow) station being considered as a transport interchange. It supports this proposal as it enables access to employment both in the town centre and in the research park via the rail network (Guildford West). GVG notes careful phasing of rail station development, and associated rail services, is required to bring the infrastructure into operation before housing and commercial space is made available in large quantities.

3.39 Whilst Woodbridge Meadows is zoned for Employment Uses in the Plan, there is no specific allocation or strategic site. This is despite the freeholds being in the Council’s ownership significant amounts of land being vacant or underused and the need for a comprehensive flood protection scheme to hold water upstream of the constraint caused by the 1930s A25 Guildford Bypass southbound bridge which is low over the river.

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

Attached documents:
1. In Policy E1, E2 there is too much emphasis on providing retail and commercial premises in Guildford town centre, when the pattern of business is changing and more town centre housing is needed. This would ease the pressure on housing on the Green Belt.

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

**Attached documents:**

Total records: 525.
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

Document part: Policy E3 - Maintaining employment capacity and improving employment floorspace
### Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/11416</th>
<th>Respondent: 8559297 / Holy Trinity Amenity Group (Robert Bromham)</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy E3</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>
<tr>
<td><strong>E3. Maintaining employment capacity.</strong> P70.</td>
<td>Contrary to the statement made we consider the permitted change of use from Business to Residential in the town centre to be beneficial to the town, and we oppose this attempt to over-rule it. <strong>Housing must take precedence</strong> over Business use.</td>
<td></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: pslp171/1839</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy E3</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>
<td>uuu) The Guildford Society is in broad support of the amendments to Policy E3. We agree that care must be exercised with converting commercial to housing use as it may significantly reduce commercial opportunities in the town centre. <strong>We would like to see some encouragement to and provision for apprenticeships in the Borough, particularly in the rural areas and near to those LSOAs which score particularly poorly in the relative subdomain deprivation indices relating to young person skills and education.</strong></td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<th>Comment ID: PSLPP16/17439</th>
<th>Respondent: 8563201 / West Horsley Parish Council (Sam Pinder)</th>
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<td><strong>E3 – Maintaining employment capacity ...</strong></td>
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**Comment ID:** PSLPP16/17485  **Respondent:** 8563201 / West Horsley Parish Council (Sam Pinder)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

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

POLICY E3: Maintaining employment capacity and improving employment floor-space

WHPC is supportive of 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:** PSLPP16/7774  **Respondent:** 8566529 / Derek Corden  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

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

This states that GBC would maintain employment capacity and improve employment floor space. As stated above, this is not catered for in the B1c, B2 & B8 categories. Policy E3 strengthens retention of employment land, but the loss of Kernel Court to residential flies in the face of this new Policy. This is notwithstanding that the Policy against loss of employment land is undertaken on a sequential test; i.e. those closest to the town are protected most. Kernal Court is on the border with the town centre and close to the major transport interchange of the railway station.

There has been no attempt to market the site for employment purposes, nor to offer the premises to the tenant who wishes to remain.

The site is in a sustainable position allowing the employer to recruit staff using public transport.

I trust that the above comments will be taken into account when considering changes to 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:** PSLPP16/7790  **Respondent:** 8566529 / Derek Corden  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

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

Para 4.4.25 states that the Policy "seeks to protect floor space to accommodate existing and future demand". This is contrary to many of the proposals to take employment sites away in the town centre and examples such as Broadford Park at Shalford.

Within Policy E3, any change of use on a strategic employment site has to be backed up by marketing "for a continuous period of least two years". This effectively is discretionary by virtue of the words "at least". The Borough Council are,
therefore, in total control, whether this is 3, 4 or indeed 5 years or indeed even more. We suggest that the words "at least" should be removed.

In relation to locally significant employment sites, the same comments apply, where there is a requirement for at least 18 months and in relation to general floor space again the words "at least" should be removed.

The penultimate paragraph in the greyed out section of Policy E3, reference is made to "once the period of comprehensive and active marketing is achieved, any other suitable employment use should be considered before change of use to residential or other use will be permitted".

We are advised by Guildford Borough Council that the definition of employment use is specific and limited to B1(a), B1(b), B1(c), B2 & B8. In reality, therefore, there are no other suitable employment uses.

However, this is an area in which we have highlighted a serious practical concern over the Local Plan. In reality, there are multiple Planning Applications each year for sui generis uses which, by definition, fall outside the definition of employment land and examples of which include all of the car showrooms located on the Slyfield Industrial Estate. A warehousing building on the Slyfield Industrial Estate would need at least 2 years' marketing, could be 3, could be 4, could be 5 and could be 10, depending on an individual Planning Officer's view. There is no specific allocation for sui generis uses in the Local Plan and yet they typically come from employment land and typically employ large numbers of people. Their loss from their technical use of employment land to the sui generis use, does not, in our view, create issues. The buildings are likely to be capable of re-use for alternative employment uses in the future and this requires to be dealt with under the Local Plan.

Similarly, the Borough has always accepted the importance of the leisure industry. There are numerous buildings which are dedicated to health and fitness and entertainment, which have come from previous employment uses. Examples of these include the Borough Council's own building in Midleton Road, which is now a trampolining centre, the Rock Climb on Cobbett Park on the Slyfield Industrial Estate, the gymnastics facility at Pew Corner on the Portsmouth Road and various private fitness gyms and pilates premises in the town centre. In a world where obesity is described as a huge problem, these facilities should be actively encouraged and specific provision made for a change of use from employment land. Other examples include The Guildford School of Acting and PPA (Performance Preparation Academy), both of whom employ large numbers of people and the provision of which is regarded as good for the Borough.

Further examples would include medical uses, which we have seen on the Research Park and which surely must be an increasingly important part of the UK's future. There is no specific allocation of land for these uses and they will occur on an ad hoc basis, but will need to be derived from employment land. Again, large numbers of people are employed in such facilities and they have to be regarded as good for the town. Why, therefore, is the Local Plan lacking in consideration of such matters?

There seems to be a desire for Guildford to aim for higher added value jobs. On paper, this is fine, but you do not have the tools within this Local Plan to facilitate that.

Within the Guildford Business Forum, we believe that the UK following the vote to leave the European Union must be flexible and adaptable and buildings and land should not remain empty whilst owners seek tenants that may not exist when demand for other uses that will employ people does exist. How can this possibly be in the interests of the Borough and critically, the residents within this Borough? The use categories do not reflect fully the world we live in and do not have the flexibility to cater for not only today's real world uses, but also future uses.

Para 4.4.27

In relation to evidence of active marketing, there is a requirement to offer premises at a competitive rate and a reasonable market rate. Who is to decide what is competitive and what is a reasonable market rate? The Borough should also bear in mind that owners of buildings will very often have mortgages where the lender's view and the Borough's view may be at odds.

There is also a requirement to demonstrate that there has been flexibility in space offered, including dividing up larger areas of floor space where this is possible and making alternative layouts. If you take Guildford Borough Council's own
building at Midleton Road, which was let to a non employment use by the Borough, this would have required them to divide this space up, to let off offices separately at the front of the building. The Policy goes even further advising that Guildford Borough Council in that above example should have looked at alternative marketing strategies, including management of the space by specialist third party providers. The suggestion behind this, therefore, is that if a 20,000 sq ft building could attract demand from a 1,000 sq ft tenant, then the land owner would be expected to make that space available on competitive terms and potentially prejudice the rest of the building. This is draconian as a policy.

Given how restrictive and demanding this Policy is, it should be very carefully considered in terms of implications.

Policy 4.4.31 advises that "employment floor space would be protected and the release of existing sites would be managed". The word managed has huge implications. Firstly, please advise how the Borough intends to manage the release of sites, as this implies a controlled process and also it advises that the Borough Council will ensure, by this management, that there is sufficient supply to accommodate existing and future demand. We do not believe that the Borough Council has the ability to do this and would wish to understand what their proposals are.

Para 4.4.32 advises that "there is no specific guidance on an appropriate period for marketing...... ".

The Policy on the previous page no. 70 does give specific guidance on the appropriate period of marketing and we feel that this clause is, therefore, contradictory.

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

Attached documents:
I believe that proof of a business being non viable before change of use, should remain (this has been removed) as easing the way to change of use increases value and restricts stock. This should not prevent business premises from being re-housed, where housing is a priority or where new transport hubs improve economic viability.

I can see no reason why restrictions on change of use should not apply to other classes of business?

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

Attached documents:

Comment ID: PSLPP16/17557  Respondent: 8581505 / Burpham Neighbourhood Forum (Jim Allen)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

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

We thank the LPA for copying the Burpham Neighbourhood Plan on Employment land policy.

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

Attached documents:

Comment ID: pslp171/2199  Respondent: 8581505 / Burpham Neighbourhood Forum (Jim Allen)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy E3

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

4.4.25

Where are these lost floor spaces recorded / reported?

4.4.26a

Insert “Appendix A2 forms part of this policy” at the end of the line.

4.4.24

We recommend the insertion of “with due regard to adopted Neighbourhood Plans” after the word “impacts”.

4.4.31

There is no employer-based evidence, other than from the university, thus any future need cannot be reliably predicted from the data presented; thus there is no informed and reasoned justification.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
The Loseley Estate has a number of employment sites in its ownership that make an important contribution to employment in the area. Over the life of the plan it anticipated that a number of existing business units may need to be redeveloped. We therefore support the last paragraph of this policy, which supports the redevelopment of outmoded employment floorspace to cater for modern business needs.

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

I object to Policy E3

GBC’s desire to promote and retain Office space within the town is commendable but naïve

I am a joint owner of office space in Guildford and along with others find it hard to let it when it becomes vacant. Up to date working methods make very good use of the internet. Modern working practices involve hot desking cloud storage of documents Telephone conferencing and other up to date methods of communication which reduce the need for office space down to that of a hub rather than a work place. My own business has halved the need for office space in Guildford yet increased our range for provision of services to 4 counties instead of 2.Factors include time and cost of travel, difficulties with public transport and car use, none of which will be addressed sufficiently by the plan. My own property was put on sale for over 6 months and has had to be provided instead on a short term let to the new occupants. (this month 7/16) The office is modern and well connected and sited with car parking! The idea that office owners would have to advertise consistently for up to 2 years would detract from the desire to build and provide space. Pop up offices in fully serviced provision is the way forward and there is already no shortage of that. There is a slow turnover of office space in the urban area and town centre and I object to Policies B1-8

I also object to the amount of warehousing space set aside at B8

We are in an age where supply and delivery is dealt with in a sophisticated manner using IT/barcoding/robotics all of which are more and more centralised. We do not need to dedicate acres of development land to this when the urgent need for Guildford Town is housing

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

Summary

I OBJECT. I do not support the policy of resisting change of use from B1a to residential because it flies in the face of positive property market solutions for the regeneration of brownfield land and is contrary to current government policy which has recently been reaffirmed and permits a change of use from B1a (offices) to C3 (residential).

Detailed response:

- I believe that the existing government policy which has recently been made permanent of allowing change of use from B1a to C3 is sound
- Many office buildings reaching an age of more than 30/50 years become redundant in terms of energy compliance making them illegal to occupy for employment purposes and the cost of refurbishment makes them redundant and uneconomic
- The reality of market demand is that the gross development value of refurbished residential space is in excess of the gross development value of refurbished old office space in many locations (this gross development value assessment is supported by the analysis by property consultants GVA in the supporting evidence within the Allies and Morrison Masterplan for Guildford dated 2015)
- Office space is available and the turnover of office space in Guildford is slow, which would seem to indicate that there is excess office capacity relative to demand
- To resist change from B1a to C3 is contrary to the concept of brownfield first for residential development schemes
- To resist change from B1a to C3 in Strategic or Significant Employment Sites is contrary to the concept of integrated mixed use communities whereby the journey to work is minimised
- London has led the way with significant residential schemes being created from redundant office stock. A good example is the South Bank in London adjacent to Waterloo Station where in 2005 the Shell Centre has been converted into flats. Another early example is the 2000 scheme at Metro Central Heights at Elephant and Castle where the old Alexander Fleming House was converted to 435 flats by St George. GBC needs to adopt more modern trends and policies.
- Guildford is in dire need of increasing town centre residential development
- The feared loss of employment will be marginal and impractical to resist. Empty office blocks are not the answer.
- I regard the evidence base (Employment Land Needs Assessment 2015 and the Guildford Borough Economic Strategy 2013-31) as flawed and inconsistent and therefore unreliable evidence
- In relation to the targets and monitoring indicators, I do not consider that the targets are desirable or sound, and therefore do not consider that the monitoring indicators are valid. Why should Guildford target 3200 additional B class jobs when it has almost full employment? Why should no employment floorspace be lost, when some of it is inappropriate and not fit for purpose? Why is it desirable to increase B1/B2/B8 floorspace?

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

Attached documents:
We object to Policy E3 maintaining employment capacity

We support the concept and aim but object on the grounds that the practicalities of sustainable transport have not been properly considered.

It is not sustainable to build dormitory towns and call them sustainable.

How can large developments outside the town centre maximise sustainable travel? This is a matter for the planning process - the further from the town centre, the less sustainable the development will be.

Reliance on cycling discriminates against vulnerable members of the community. How can the disabled, those with small children, or the very old, or the infirm, or those who are ill, cycle outside the town in order to commute, or even inside the town? Only some people cycle - and Guildford has some steep hills, especially going out of town. Park and rides are slow – how can those with a 3 hour commute add 1 hour to their journey from using park and rides?

The only sustainable mechanism for new developments is to have them in the town centre close to the railway and the main shopping links where a hoppa bus can provide satisfactory links for those who cannot walk or cycle.

While we welcome the intention to encourage rail travel by adding two new stations there could unintended consequences.

Once again we see the word “expect” used which means the policy has no teeth. The word “expect” must be replaced with the word “require” so that this policy is enforceable.

There are a number of problems with this policy.

Congestion is a widely recognised factor in the local area of Guildford, and this is a major factor in the public response to the proposed housing numbers, which represents more than a 25% increase in housing numbers in a borough that is already profoundly congested. [Source: SHMA p61: itself sourced from ONS for 2013.] Residents recognise that to increase the population by this level within the existing transport provision is not feasible, and this informs much of the public response to the proposed level of housing accommodation.

It is not clear that this recognition, which is widespread through the borough, is shared by those who have drafted the Local Plan.

Guildford is a commuter town, which (compared to London) offers better quality of life and lower house prices, so it will continue to be a commuter town for the foreseeable future. As a result, access to the stations for commuting is of significance. It is not realistic to assume that traffic to stations for commuters can be replaced either by bus services (slow, intermittent, expensive, and in many cases absent completely) or by cycle. There is a capacity issue of car parking at the station, which effectively creates an absolute constraint on the feasibility of commuting from Guildford.

Cycling is attractive, and, for the urban young, especially students, it is both practical and cheap, and can be quick. However, as noted, those en route to work cannot be assumed to be able to cycle in working clothes. Elderly members of the community, those transporting small children, and the disabled cannot participate in cycling except to a limited extent. Effectively the “average” person deemed to be capable of cycling to substitute for car trips is an able-bodied adult not travelling to somewhere where smart clothing is required, not needing to arrive clean (or with showering facilities on arrival, not provided by all employers); this is not sufficiently widespread in terms of the local demographic for travellers.
that it should be allowed to determine policy – and of course, not needing to transport, for example, supermarket shopping after the trip. What about the disabled? the elderly? those looking after more than one child? Are they to be housebound? This is not a reasonable strategy. Before transport and buildings are determined on the basis of such a policy, it is also imperative that safe cycle routes are implemented through the borough. Cycling in winter on rural roads is inherently more dangerous. Upgrading these roads would not be feasible in terms of cost nor desirable in terms of local character.

Cycle lanes which disappear into normal traffic lanes, which travel over potholes and which allow cyclists to be threatened by HGVs are not conducive to wider cycle usage, nor should wider cycle usage be encouraged until it can be demonstrated that it is safe, which currently, locally, it is not. The A25 cycle corridor scheme (Part of LRN1) will exchange the risk between cyclists and vehicles sharing space for the risk between cyclists and pedestrians sharing space. Much of the A25 has no pedestrian area anyway outside the urban space. Many cyclists travel at high speed and they will be put into conflict with pedestrians including mothers with very young children and schoolchildren many of whom need to cross the road and hence cross the cycleway. This is likely to lead to accidents and pedestrians are being disadvantaged.

Road capacity reduces as average speeds come down due to congestion. Where proper cycle lanes or off-road lanes are not provided then it is inevitable that safe driving will lead to reduced average motor vehicle speeds and gap development in the traffic stream. Both these effects act to reduce the capacity of our local road network. This loss of capacity has not been recognised in the Transport Strategy.

The concept of the park and ride with access into the town limited for those who live outside the town, is similarly flawed. Park and Ride is expensive, cumbersome and slow. It should be noted that in Oxford it has had a disastrous impact on small local retailers which is a retail segment that it is important to retain and support.

Use of park and rides increases the use of the strategic road network by local users, which is not what it is designed to do.

This proposal is combined with aggressive exclusion from the town of those who are living in peripheral communities, which will increasingly resemble housing estates. This is a strategy for sink estates through Surrey instead of the Green Belt - this is not a strategy for growth. Head offices will choose to go elsewhere, because highly skilled staff and management in the cutting edge industries that GBC wants to encourage, will not choose to live in a dense housing estate.

The existing extent of traffic congestion has not been fully recognised. As a consequence the impact of the various development scenarios has been understated and the infrastructure costs are an understatement.

The transport studies are incomplete and unpublished and this should have led to deferral of consideration of the Local Plan consultation process until it was possible to revise the plan post publication of the studies. This matter was raised by a number of councillors at the Full Council meeting on 24 May 2016 when the consultation was approved, but a motion to defer was overturned by the majority party.

Cross-subsidy in terms of infrastructure is envisaged. The infrastructure deficit needs to be resolved before there are large numbers of new residents exacerbating the current congestion. The funding of the new developments through CIL and S 106 is expected to contribute to the transport impacts across the borough, and there is negligible concern for the transport problems created within those new developments or in areas adjacent to them. This is not acceptable to existing residents and is likely to cause some problems with the future residents too, who may arguably feel aggrieved that the road funding associated with their developments is being subverted to other areas. While this may be permissible under the revised CIL regulations it is questionable whether it is morally acceptable to grant planning permission to build on the Green Belt in order to cross subsidise the building of roads or other infrastructure in the town centre or elsewhere across the borough or outside it.

Insetting of villages and the proposed relaxation of planning restrictions anywhere outside settlements (Green Belt or not), implied in P2, will lead to substantial infilling that will not require traffic assessment but will contribute a highly significant amount of additional car journeys overall - by a more insidious process than the large developments proposed.
Costs for rail or bus travel could be substantially reduced and would incentivise their use; but these are outside the remit of GBC and so cannot be encouraged by them.

It remains to be seen whether the proposed new stations will be delivered as they are not entirely within the council’s control. While we welcome the intention to encourage rail travel by adding two new stations there could be unintended consequences as the roads local to both sites are heavily congested. If parking facilities are inadequate this could lead to a need for onerous parking restrictions on roads nearby – possibly affecting small businesses adversely.

If parking facilities are adequate this will encourage more traffic onto local roads and commuters tend to be hurrying to catch a train or anxious to return home after a day at work. That does not bode well for the safety of pedestrians needing to cross those roads. House prices near to stations tend to attract higher prices and this will increase the profit motive to developers wanting to build on greenfield sites nearby. It will also mean that so-called affordable housing will be even less affordable at these sites. It may also lead, over time, to an undesirable loss of social-rented housing in the vicinity. A minor issue is that stopping at the additional stations will increase the train journey times to and from Guildford town centre on the lines affected.

Detail in Policy wording – flawed drafting:

The policy begins and ends with the weak and totally ineffective word, in planning terms, “expect”.

Contributing through CIL will not necessarily address needs local to the development concerned, and created by it, but may involve solving existing problems elsewhere in the Borough.

Bullets 4 & 5 – improvements to park and ride facilities imply increased car usage from outside the town and the parking provision acknowledges that most journeys will be by car.

Bullet 6 - Has the Vehicle parking Supplementary Planning Document been published? It is not listed as key evidence but the policy refers. How can a policy have been determined with reference to a non-existent part of the evidence base?

Bullets 7,8, 9 & 10 are weak & aspirational with let-out words such as “facilitate the use of”, “wherever possible”, “contribute” and “where appropriate” (and poorly bulleted!). How will the use of ultra low emission vehicles be facilitated? This is such a vague aspiration as to be meaningless.

The policy only “expects” new developments to contribute, demonstrate adequate provision, etc – it should enforce them. A transport statement AND assessment ought to be a fixed requirement – not a matter for negotiation – while the policy implies that this might be waived even for sites that generate significant amounts of movement.

The construction traffic, noise and pollution generated by meeting the proposed housing number will be excessive. It will have a highly significant impact on the amenity and health of those residents living close to the development sites and those who live on the routes that will be taken by the construction traffic.

The last paragraph says nothing new in planning terms but does mean that the Local Plan has not fully and properly considered the traffic impacts of the proposed sites. We have experience of how misleading the TAs produced by developers can be – using averaging techniques and understated baseline figures, days when schools are not operating and many other devices to pull the wool over the eyes of planning authorities. This aspect is a denial of responsibility by GBC. The result is that Green Belt and countryside will be released for development when fuller consideration of traffic impacts at the Local Plan stage should have prevented that. If the planning authority is taken in by developers’ TAs then wholly unsuitable developments will be permitted.

Introduction:

The spatial development strategy (paragraph 4.6.20 and Policy S2) does not address the development needs of the borough ensuring distances are practical; this is certainly not the case with all the development sites. For example, the Wisley airfield site will generate a massive increase in vehicle journeys; developments in West Horsley will lead to greater car use, as will the proposed developments at Garlick’s Arch and in Send. The obvious site choice for sustainable
development would be on brownfield sites in the town but the Local Plan proposes allocating those sites to the declining retail industry instead.

Paragraph 4.6.21 suggests that sustainable transport is promoted. Far from providing sustainable transport this Plan will generate a massive increase in motor vehicle journeys. The Plan cannot force residents to ride bicycles or walk everywhere.

Justification:

Paragraph 4.6.22 seeks to set out a reasoned justification and alleges that development should offer real travel choice by sustainable transport modes. There is little sign that this is being taken seriously enough now.

Paragraph 4.6.23 proposed to bring forward a Vehicle Parking Supplementary Planning Document. It is not clear what to make of this. Failure to provide off-street vehicle parking will not prevent residents owning cars and finding somewhere else to park but it may make life difficult for key workers to commute to their place of work. How can a consultation take place relying on non-existent background documents which are key parts of the Evidence Base? How can anyone comment on non-existent documents, and even if brought forward part-way through the consultation, any comments will be prejudiced by the absence of this informing the start of the consultation.

Paragraph 4.6.24 refers to the Sustainable Movement Corridor. Bus services are aspirational but economic reality may mean that they fail to persist. There is not enough detail published on how the SMC will be delivered – suggesting that it is aspirational rather than fully thought through.

Paragraph 4.6.26 refers to reviewing existing transport facilities and likely transport generation as part of assessing the amount of incremental travel demand. That consideration should have taken place in a robust and detailed manner on a site-by-site basis before the sites were allocated in the Local Plan. It is not sufficient to leave that until the planning application stage as intended by GBC and SCC, given that all sites will be subject to “permission in principle” under the Housing and Planning Act 2016 and so will not be capable of subsequent rejection on these grounds.

Paragraph 4.6.27 notes that Development must mitigate its transport impacts. The measures described rely entirely on people taking them up and not dumping their travel information packs in the nearest bin. It is clear that GBC, in response to concerns about elderly and disabled people failing to be coerced into riding bicycles are now suggesting tricycles to overcome this obstacle to their aspirations. They should be aware that while tricycles may help with balance issues they are heavier and harder to ride uphill. While the policy (unusually) notes that mitigation must be provided, in fact this is then diluted to suggest that facilities for electric car charging points and encouragement to car-share can be sufficient; all are optional and therefore meaningless.

However well designed a development is it will make matters worse during construction and if on a greenfield site, it is hard to see how it will achieve environmental benefits. On the other hand, replacing inefficient buildings on a brownfield site could lead to benefits in the long term.

Paragraph 4.6.28 notes “Developers should have regard” to the “Infrastructure Schedule at Appendix C”. The only thing that developers have regard for is forcing their application through and maximising their profit – that is the business they are in. Appendix C is lacking in detail. It notes, for example that there will be new town centre bus facilities at a cost of £5-10million – such vagueness make it clear that no real costing or analysis of proposals has been prepared, and that the Infrastructure improvements proposed have not been properly considered. Having regard to fluid and uncertain proposals is effectively meaningless as a constraint or a requirement.

Paragraph 4.6.29 requires that applications need to address the transport implications of the proposed development. Experience with recent planning applications suggests that developers will do everything in their power to understate transport impacts and we have no faith in GBC and SCC taking a sufficiently robust line on this.

Key Evidence is missing or inadequate.

The Strategic Transport Assessment (SCC 2016) is listed as “forthcoming”, but this plan has been produced in the absence of any strategic transport review.
There are further inadequacies in the Evidence Base, highlighted in the following annexes, which include examples of deficiencies, ambiguities and inadequacies in the transport and infrastructure evidence. This is not a comprehensive list of deficiencies, but serves as an illustration of the poor evidence on which decisions have been based.

Annexe 1

Comments on Guildford Borough Transport Study 2016

Page 2 – “address the historic infrastructure deficit” - developers are not required to do this?

Page 2 – It is wrong to claim that the cycle infrastructure along the A25 is good – and many cyclists are not careful, so putting them in contention with pedestrians is not a good idea.

Page 5 – The decision on Heathrow or Gatwick has yet to be taken but airport expansion in the south-east cannot be regarded as sustainable development and, although GBC has no control over such external decisions, its own growth agenda will drive a need for that expansion.

Page 6 An additional weakness is alternative “road closure diversion” routes for the SRN on the LRN

Page 6 Are the “Committed Improvements” actually committed and guaranteed to be delivered?

Page 7 The rail strategy does not provide for Wisley (residents would drive to stations)

Page 7 How long will it take to deliver Crossrail 2? “We hope that Crossrail 2 could be operational by 2030, but we are in the very early stages of planning and no decision to build it has been made.”

Page 7 Guildford platform capacity still many years away if ever.

Page 7 The rail strategy anticipates many improvements that have not been secured and may have unintended consequences if they proceed (see above)

Page 7 The Southern Rail Access to Heathrow #see the feasibility study dated December 2015 – although other proposals may be put forward (e.g. by Hounslow) is still in its early stages and would have significant impacts on open space beyond our Borough. For example, all options in the feasibility study would use Staines Moor SSSI and Option 4 would use Bedfont Lakes Country Park (a Local Nature Reserve and SNCI).

The various options would use existing commercial, residential and highways land in varying degrees. It seems unlikely that a solution will be delivered within the Plan period and removal of highly valued open space with high biodiversity (wherever it is in South-east England) cannot be regarded as sustainable.

Page 10 and 13 There is a stark contrast between the plans for the town centre which involve encouraging a reduction in traffic by reducing roadspace and the plans for the SRN and parts of the LRN which involve increasing capacity. While increasing capacity may reduce some areas of congestion in the short term, history suggests that traffic will rapidly grow until the improved roads are congested once again. This can hardly be regarded as sustainable. A sustainable option would be to apply a very substantial traffic infrastructure constraint on the housing number.

Page 10 While the A3 Guildford Tunnel aspiration has some environmental advantages over widening (in particular for residents living close to the A3), the environmental burden of the construction phase will be far higher and aspects such as location of ventilation stacks and their local effect (in all weather conditions) do not appear to have been considered.

Page 14 Under Weaknesses the point about A roads in Guildford Town also applies to surrounding areas in the Borough and beyond. The anticipated improvements ignore existing congestion to the south and east of Guildford – presumably because SCC’s transport assessment methodology only identifies the tip of the iceberg. The current Plan will see increased congestion and a resultant reduction in air quality in many areas beyond the town centre.
Page 16 “Largely commercial bus services” is seen as a strength whereas it should be seen as a weakness with a trend to reduced subsidies and the provision of bus services, especially in rural areas, being increasingly dependent on commercial gain. It is difficult to see this changing under the current Government cuts philosophy. The point “Subject to business case including funding” under Aspirations demonstrates this point.

Page 18 We welcome the aspiration to “Expand the public realm through significantly extended pedestrian-priority areas”

Page 19 Guildford is well behind other areas in monitoring air quality let alone attempting to reduce it.

The introduction talks about reductions in some pollutants. This may be the case for pollutants such as Sulphur Dioxide, which contributed to the visible London smogs, but it is not true of diesel vehicle emissions which have increased as a result of Government policy including its aggressive growth agenda and population increase through immigration.

30 accessible electric vehicle charging points are only an aspiration and will be nowhere near enough if there is a real shift to electric vehicles.

It is clear from the “Strategy outcomes” that GBC would prefer not to follow other areas in pro-actively tackling air quality.

Page 22/23/24 The timescales indicate that the main rail improvements (Including the two new stations) are unlikely to be delivered until the end of the Plan period or even later. The sites that are supposedly justified by their inclusion will generate a major increase in road traffic in the interim and it may be more difficult to achieve this aspect of modal shift in the longer term. The same can be said about the other traffic infrastructure proposals. Residential development is being scheduled before the infrastructure that it will need.

Page 24 Monitoring – “Increase” needs to be in proportion to population growth as otherwise failure will taken as success. “An Increase in average vehicle speeds” is inconsistent with the desire to reduce the number of persons killed or seriously injured. For example, some A roads pass through residential areas where pedestrians, including schoolchildren, are trying to cross the road at peak times. It is noted that increase in vehicle speeds is only desired in the morning. Going home from work does not seem to matter!

Annexe 2

GTAMS

NPPF and NPPG The Plan ignores the points concerning Green Belt and protecting the environment. GBC have tried to get round this by spinning their messages and using misleading statistics including a major understatement of the area of Green Belt to be removed.

Planning Update (March 2015) – The point in this update concerning Green Belt has been ignored

Monitoring Indicators:

Ten years is far too long to wait for information on whether the approach is working or not. The target requires only an increase. This would permit an increase less than that in line with any population growth to be regarded as success. The bar has been set well within the failure range.

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

Attached documents:

Comment ID: PSLPP16/1404  Respondent: 8671969 / Valerie Thompson  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
E3 Surrey Research Park

I object to Surrey University dictating how and where they may develop and extend the Research Park into an even larger Business Park.

There is a conflict between the University’s public role as a University and it’s private intention to be profit-making.

The University should not be permitted to extend their Research Park onto land at Blackwell Farm, which is visible for miles around. Development here will ruin views of the Hogs Back for ever.

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

Attached documents:

Comment ID: PSLPP16/1076  Respondent: 8687265 / Dagero Ltd (David Roberts)  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY E3 - Maintaining employment capacity and improving employment floorspace

I OBJECT. The policy of resisting change of use from B1a to residential flies in the face of positive property market solutions for the regeneration of brownfield land and is contrary to national Government policy, recently reconfirmed, which permits changes of use from B1a (offices) to C3 (residential).

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

Attached documents:

Comment ID: PSLPP16/2627  Respondent: 8693153 / Vicki Willetts  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY E3 (EMPLOYMENT CAPACITY AND FLOORSPACE): • Puts unnecessary obstacles in the way of using brownfield land into useful residential housing, contrary to government policy.

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

Attached documents:

Comment ID: PSLPP16/4727  Respondent: 8711841 / Rosmarie Roberts-Kunz  Agent:
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<th>Comment ID: PSLPP16/9061</th>
<th>Respondent: 8723809 / Sally Blake</th>
<th>Agent:</th>
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<th>Respondent: 8741377 / Lisanne Mealing</th>
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<td>Object</td>
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<td>This policy appears to conflict with government policy on using Brownfield land for housing. We would like see brownfield released for housing, especially in Guildford town area.</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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I object to the employment strategy and impact on Garlicks Arch (A43)

The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable.

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

Attached documents:

Comment ID: PSLPP16/6406  Respondent: 8773953 / Robin Garnett  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

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 keep most of the current brownfield sites within Guildford for commercial use. Guildford should be catering for high end businesses that require minimum floor space thus allowing more brownfield area for residential development.

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

Attached documents:

Comment ID: PSLPP16/2361  Respondent: 8806305 / Laurence Cook  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

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

POLICY E3 - Maintaining employment capacity and improving employment floor space

I OBJECT. The policy of resisting change of use from B1a to residential flies in the face of positive property market solutions for the regeneration of brownfield land and is contrary to national Government policy, recently reconfirmed, which permits changes of use from B1a (offices) to C3 (residential).

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

Attached documents:

Comment ID: PSLPP16/180  Respondent: 8823553 / Rick Day  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

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

Policy E3 is laudable in that it seeks to mitigate the creation of a "dormitory" town. However, this does nothing to alleviate the pressure on housing by restricting potential supply. Perhaps policy H2 should be altered to have a higher content of affordable homes? Are statistics available that show the breakdown of employment location for each class of dwelling? This could form a basis for % affordable homes in H2.
**Comment ID:** PSLPP16/15769  **Respondent:** 8836129 / Roger Shapley  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

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

To resist change from B1a to C3 in Strategic or Significant Employment Sites is contrary to the concept of integrated mixed use communities whereby the journey to work is minimised and contrary to the concept of brownfield first for residential development schemes. Existing government policy allowing change of use from B1a to C3 has recently been made permanent.

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

**Attached documents:**

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**Comment ID:** PSLPP16/16222  **Respondent:** 8839041 / Jon Maslin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

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

I object to Policy E3 maintaining employment capacity.

I object to the ill-informed policy of resisting change of use from B1a to residential because it flies in the face of positive property market solutions for the regeneration of brownfield land. It is also contrary to current government policy which has recently been reaffirmed and permits a change of use from B1a (offices) to C3 (residential).

I believe that the existing government policy which has recently been made permanent of allowing change of use from B1a to C3 is sound.

Many office buildings reaching an age of more than 30/50 years become redundant in terms of energy compliance making them illegal to occupy for employment purposes and the cost of refurbishment makes them redundant and uneconomic.

The reality of market demand is that the gross development value of refurbished residential space is in excess of the gross development value of refurbished old office space in many locations (this gross development value assessment is supported by the analysis by property consultants GVA in the supporting evidence within the Allies and Morrison Masterplan for Guildford dated 2015).

To resist change from B1a to C3 is contrary to the concept of brownfield first for residential development schemes.

To resist change from B1a to C3 in Strategic or Significant Employment Sites is contrary to the concept of integrated mixed use communities whereby the journey to work is minimised.

London has led the way with significant residential schemes being created from redundant office stock. A good example is the South Bank in London adjacent to Waterloo Station where in 2005 the Shell Centre has been converted into flats. Another early example is the 2000 scheme at Metro Central Heights at Elephant and Castle where the old Alexander Fleming House was converted to 435 flats by St George. GBC needs to adopt more modern trends and policies.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12710   Respondent: 8839553 / David Burnett   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

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

I OBJECT to the expansion of employment space in the Local Plan.

The Employment Land Needs Assessment 2015 shows an 80% reduction in employment space from the previous ELNA carried out in 2013. Many industrial trading estates such as the Sheerwater Estate in Woking and Watchmoor Park in Camberley have vast units which remain unoccupied. This means that the addition of new industrial spaces, such as at Site A43, are not needed.

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

Attached documents:

Comment ID: PSLPP16/18186   Respondent: 8843361 / Adrian Atkinson   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

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

I object to Policy E3 maintaining employment capacity I object we should be changing use from B1a to residential as this is in line with positive property market solutions for the regeneration of brownfield land and is in line with government policy of change of use from B1a (offices) to C3 (residential). Many office buildings are 30/50 years old and the cost of refurbishment makes them redundant and uneconomic. In the present market situation the need for development to residential space is in excess of the value and need of refurbished old office space in many locations. This would also increase the concept of integrated mixed use communities whereby the journey to work is minimised. If the need for housing is so great that 70% is being proposed on the protected Green Belt then the first port of call is more sustainable brownfield sites such as tired xs offices closer to employment and transport hubs - Guildford is in dire need of increasing town centre residential development.

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

Attached documents:

Comment ID: PSLPP16/17780   Respondent: 8858113 / Ramsey Nagaty   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

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

I object to Policy E3 maintaining employment capacity
I support the concept and aim but object on the grounds that the practicalities of sustainable transport have not been properly considered.

It is not sustainable to build dormitory towns and call them sustainable.

Not everyone can cycle all the time.

How can large developments outside the town centre maximise sustainable travel? This is a matter for the planning process— the further from the town centre, the less sustainable the development will be.

Reliance on cycling discriminates against vulnerable members of the community. How can the disabled, those with small children, or the very old, or the infirm, or those who are ill, cycle outside the town in order to commute, or even inside the town? Only some people cycle—and Guildford has some steep hills, especially going out of town. Park and rides are slow – how can those with a 3 hour commute add 1 hour to their journey from using park and rides?

The only sustainable mechanism for new developments is to have them in the town centre close to the railway and the main shopping links where a hoppa bus can provide satisfactory links for those who cannot walk or cycle.

While I welcome the intention to encourage rail travel by adding two new stations there could be unintended consequences.

Once again we see the word “expect” used which means the policy has no teeth. The word “expect” must be replaced with the word “require” so that this policy is enforceable.

There are a number of problems with this policy.

Congestion is a widely recognised factor in the local area of Guildford, and this is a major factor in the public response to the proposed housing numbers, which represents more than a 25% increase in housing numbers in a borough that is already profoundly congested. [Source: SHMA p61: itself sourced from ONS for 2013.] Residents recognise that to increase the population by this level within the existing transport provision is not feasible, and this informs much of the public response to the proposed level of housing accommodation.

It is not clear that this recognition, which is widespread through the borough, is shared by those who have drafted the Local Plan.

Guildford is a commuter town, which (compared to London) offers better quality of life and lower house prices, so it will continue to be a commuter town for the foreseeable future. As a result, access to the stations for commuting is of significance. It is not realistic to assume that traffic to stations for commuters can be replaced either by bus services (slow, intermittent, expensive, and in many cases absent completely) or by cycle. There is a capacity issue of car parking at the station, which effectively creates an absolute constraint on the feasibility of commuting from Guildford.

Cycling is attractive, and, for the urban young, especially students, it is both practical and cheap, and can be quick. However, as noted, those en route to work cannot be assumed to be able to cycle in working clothes. Elderly members of the community, those transporting small children, and the disabled cannot participate in cycling except to a limited extent. Effectively the “average” person deemed to be capable of cycling to substitute for car trips is an able-bodied adult not travelling to somewhere where smart clothing is required, not needing to arrive clean (or with showering facilities on arrival, not provided by all employers); this is not sufficiently widespread in terms of the local demographic for travellers that it should be allowed to determine policy – and of course, not needing to transport, for example, supermarket shopping after the trip. What about the disabled? the elderly? those looking after more than one child? Are they to be housebound? This is not a reasonable strategy. Before transport and buildings are determined on the basis of such a policy, it is also imperative that safe cycle routes are implemented through the borough. Cycling in winter on rural roads is inherently more dangerous. Upgrading these roads would not be feasible in terms of cost nor desirable in terms of local character.
Cycle lanes which disappear into normal traffic lanes, which travel over potholes and which allow cyclists to be threatened by HGVs are not conducive to wider cycle usage, nor should wider cycle usage be encouraged until it can be demonstrated that it is safe, which currently, locally, it is not. The A25 cycle corridor scheme (Part of LRN1) will exchange the risk between cyclists and vehicles sharing space for the risk between cyclists and pedestrians sharing space. Much of the A25 has no pedestrian area anyway outside the urban space. Many cyclists travel at high speed and they will be put into conflict with pedestrians including mothers with very young children and schoolchildren many of whom need to cross the road and hence cross the cycleway. This is likely to lead to accidents and pedestrians are being disadvantaged.

Road capacity reduces as average speeds come down due to congestion. Where proper cycle lanes or off-road lanes are not provided then it is inevitable that safe driving will lead to reduced average motor vehicle speeds and gap development in the traffic stream. Both these effects act to reduce the capacity of our local road network. This loss of capacity has not been recognised in the Transport Strategy.

The concept of the park and ride with access into the town limited for those who live outside the town, is similarly flawed. Park and Ride is expensive, cumbersome and slow. It should be noted that in Oxford it has had a disastrous impact on small local retailers which is a retail segment that it is important to retain and support.

Use of park and rides increases the use of the strategic road network by local users, which is not what it is designed to do.

This proposal is combined with aggressive exclusion from the town of those who are living in peripheral communities, which will increasingly resemble housing estates. This is a strategy for sink estates through Surrey instead of the Green Belt - this is not a strategy for growth. Head offices will choose to go elsewhere, because highly skilled staff and management in the cutting edge industries that GBC wants to encourage, will not choose to live in a dense housing estate.

The existing extent of traffic congestion has not been fully recognised. As a consequence the impact of the various development scenarios has been understated and the infrastructure costs are an understatement.

The transport studies are incomplete and unpublished and this should have led to deferral of consideration of the Local Plan consultation process until it was possible to revise the plan post publication of the studies. This matter was raised by a number of councillors at the Full Council meeting on 24 May 2016 when the consultation was approved, but a motion to defer was overturned by the majority party.

Cross-subsidy in terms of infrastructure is envisaged. The infrastructure deficit needs to be resolved before there are large numbers of new residents exacerbating the current congestion. The funding of the new developments through CIL and S 106 is expected to contribute to the transport impacts across the borough, and there is negligible concern for the transport problems created within those new developments or in areas adjacent to them. This is not acceptable to existing residents and is likely to cause some problems with the future residents too, who may arguably feel aggrieved that the road funding associated with their developments is being subverted to other areas. While this may be permissible under the revised CIL regulations it is questionable whether it is morally acceptable to grant planning permission to build on the Green Belt in order to cross subsidise the building of roads or other infrastructure in the town centre or elsewhere across the borough or outside it.

In-setting of villages and the proposed relaxation of planning restrictions anywhere outside settlements (Green Belt or not), implied in P2, will lead to substantial infilling that will not require traffic assessment but will contribute a highly significant amount of additional car journeys overall - by a more insidious process than the large developments proposed.

Costs for rail or bus travel could be substantially reduced and would incentivise their use; but these are outside the remit of GBC and so cannot be encouraged by them.

It remains to be seen whether the proposed new stations will be delivered as they are not entirely within the council’s control and run counter to the Railways intent to speed up journey something adding stations would prevent. While we
welcome the intention to encourage rail travel by adding two new stations there could be unintended consequences as the roads local to both sites are heavily congested. If parking facilities are inadequate this could lead to a need for onerous parking restrictions on roads nearby – possibly affecting small businesses adversely.

If parking facilities are adequate this will encourage more traffic onto local roads and commuters tend to be hurrying to catch a train or anxious to return home after a day at work. That does not bode well for the safety of pedestrians needing to cross those roads. House prices near to stations tend to attract higher prices and this will increase the profit motive to developers wanting to build on greenfield sites nearby. It will also mean that so-called affordable housing will be even less affordable at these sites. It may also lead, over time, to an undesirable loss of social-rented housing in the vicinity. A minor issue is that stopping at the additional stations will increase the train journey times to and from Guildford town centre on the lines affected.

Detail in Policy wording – flawed drafting:

The policy begins and ends with the weak and totally ineffective word, in planning terms, “expect”.

Contributing through CIL will not necessarily address needs local to the development concerned, and created by it, but may involve solving existing problems elsewhere in the Borough.

Bullets 4 & 5 – improvements to park and ride facilities imply increased car usage from outside the town and the parking provision acknowledges that most journeys will be by car.

Bullet 6 - Has the Vehicle parking Supplementary Planning Document been published? It is not listed as key evidence but the policy refers. How can a policy have been determined with reference to a non-existent part of the evidence base?

Bullets 7, 8, 9 & 10 are weak & aspirational with let-out words such as “facilitate the use of”, “wherever possible”, “contribute” and “where appropriate” (and poorly bulleted!). How will the use of ultra low emission vehicles be facilitated? This is such a vague aspiration as to be meaningless.

The policy only “expects” new developments to contribute, demonstrate adequate provision, etc – it should enforce them. A transport statement AND assessment ought to be a fixed requirement – not a matter for negotiation – while the policy implies that this might be waived even for sites that generate significant amounts of movement.

The construction traffic, noise and pollution generated by meeting the proposed housing number will be excessive. It will have a highly significant impact on the amenity and health of those residents living close to the development sites and those who live on the routes that will be taken by the construction traffic.

The last paragraph says nothing new in planning terms but does mean that the Local Plan has not fully and properly considered the traffic impacts of the proposed sites. We have experience of how misleading the TAs produced by developers can be – using averaging techniques and understated baseline figures, days when schools are not operating and many other devices to pull the wool over the eyes of planning authorities. This aspect is a denial of responsibility by GBC. The result is that Green Belt and countryside will be released for development when fuller consideration of traffic impacts at the Local Plan stage should have prevented that. If the planning authority is taken in by developers’ TAs then wholly unsuitable developments will be permitted.

Introduction:

The spatial development strategy (paragraph 4.6.20 and Policy S2) does not address the development needs of the borough ensuring distances are practical; this is certainly not the case with all the development sites. For example, the Wisley airfield site will generate a massive increase in vehicle journeys; developments in West Horsley will lead to greater car use, as will the proposed developments at Garlick’s Arch and in Send. The obvious site choice for sustainable development would be on brownfield sites in the town but the Local Plan proposes allocating those sites to the declining retail industry instead.

Paragraph 4.6.21 suggests that sustainable transport is promoted. Far from providing sustainable transport this Plan will generate a massive increase in motor vehicle journeys. The Plan cannot force residents to ride bicycles or walk everywhere.
Paragraph 4.6.22 seeks to set out a reasoned justification and alleges that development should offer real travel choice by sustainable transport modes. There is little sign that this is being taken seriously enough now.

Paragraph 4.6.23 proposed to bring forward a Vehicle Parking Supplementary Planning Document. It is not clear what to make of this. Failure to provide off-street vehicle parking will not prevent residents owning cars and finding somewhere else to park but it may make life difficult for key workers to commute to their place of work. How can a consultation take place relying on non-existent background documents which are key parts of the Evidence Base? How can anyone comment on non-existent documents, and even if brought forward part-way through the consultation, any comments will be prejudiced by the absence of this informing the start of the consultation.

Paragraph 4.6.24 refers to the Sustainable Movement Corridor. Bus services are aspirational but economic reality may mean that they fail to persist. There is not enough detail published on how the SMC will be delivered – suggesting that it is aspirational rather than fully thought through.

Paragraph 4.6.26 refers to reviewing existing transport facilities and likely transport generation as part of assessing the amount of incremental travel demand. That consideration should have taken place in a robust and detailed manner on a site-by-site basis before the sites were allocated in the Local Plan. It is not sufficient to leave that until the planning application stage as intended by GBC and SCC, given that all sites will be subject to “permission in principle” under the Housing and Planning Act 2016 and so will not be capable of subsequent rejection on these grounds.

Paragraph 4.6.27 notes that Development must mitigate its transport impacts. The measures described rely entirely on people taking them up and not dumping their travel information packs in the nearest bin. It is clear that GBC, in response to concerns about elderly and disabled people failing to be coerced into riding bicycles are now suggesting tricycles to overcome this obstacle to their aspirations. They should be aware that while tricycles may help with balance issues they are heavier and harder to ride uphill. While the policy (unusually) notes that mitigation must be provided, in fact this is then diluted to suggest that facilities for electric car charging points and encouragement to car-share can be sufficient; all are optional and therefore meaningless.

However well designed a development is it will make matters worse during construction and if on a greenfield site, it is hard to see how it will achieve environmental benefits. On the other hand, replacing inefficient buildings on a brownfield site could lead to benefits in the long term.

Paragraph 4.6.28 notes “Developers should have regard” to the “Infrastructure Schedule at Appendix C”. The only thing that developers have regard for is forcing their application through and maximising their profit – that is the business they are in. Appendix C is lacking in detail. It notes, for example that there will be new town centre bus facilities at a cost of £5-10million – such vagueness make it clear that no real costing or analysis of proposals has been prepared, and that the Infrastructure improvements proposed have not been properly considered. Having regard to fluid and uncertain proposals is effectively meaningless as a constraint or a requirement.

Paragraph 4.6.29 requires that applications need to address the transport implications of the proposed development. Experience with recent planning applications suggests that developers will do everything in their power to understate transport impacts and we have no faith in GBC and SCC taking a sufficiently robust line on this.

Key Evidence is missing or inadequate.

The Strategic Transport Assessment (SCC 2016) is listed as “forthcoming”, but this plan has been produced in the absence of any strategic transport review.

There are further inadequacies in the Evidence Base, highlighted in the following annexes, which include examples of deficiencies, ambiguities and inadequacies in the transport and infrastructure evidence. This is not a comprehensive list of deficiencies, but serves as an illustration of the poor evidence on which decisions have been based.

Annexe 1
Comments on Guildford Borough Transport Study 2016

Page 2 – “address the historic infrastructure deficit” - developers are not required to do this?

Page 2 – It is wrong to claim that the cycle infrastructure along the A25 is good – and many cyclists are not careful, so putting them in contention with pedestrians is not a good idea.

Page 5 – The decision on Heathrow or Gatwick has yet to be taken but airport expansion in the south-east cannot be regarded as sustainable development and, although GBC has no control over such external decisions, its own growth agenda will drive a need for that expansion.

Page 6 An additional weakness is alternative “road closure diversion” routes for the SRN on the LRN

Page 6 Are the “Committed Improvements” actually committed and guaranteed to be delivered?

Page 7 The rail strategy does not provide for Wisley (residents would drive to stations)

Page 7 How long will it take to deliver Crossrail 2? “We hope that Crossrail 2 could be operational by 2030, but we are in the very early stages of planning and no decision to build it has been made.”

Page 7 Guildford platform capacity still many years away if ever.

Page 7 The rail strategy anticipates many improvements that have not been secured and may have unintended consequences if they proceed (see above)

Page 7 The Southern Rail Access to Heathrow [see the feasibility study dated December 2015 – although other proposals may be put forward (e.g.by Hounslow)] is still in its early stages and would have significant impacts on open space beyond our Borough. For example, all options in the feasibility study would use Staines Moor SSSI and Option 4 would use Bedfont Lakes Country Park (a Local Nature Reserve and SNCI).

The various options would use existing commercial, residential and highways land in varying degrees. It seems unlikely that a solution will be delivered within the Plan period and removal of highly valued open space with high biodiversity (wherever it is in South-east England) cannot be regarded as sustainable.

Page 10 and 13 There is a stark contrast between the plans for the town centre which involve encouraging a reduction in traffic by reducing roadspace and the plans for the SRN and parts of the LRN which involve increasing capacity. While increasing capacity may reduce some areas of congestion in the short term, history suggests that traffic will rapidly grow until the improved roads are congested once again. This can hardly be regarded as sustainable. A sustainable option would be to apply a very substantial traffic infrastructure constraint on the housing number.

Page 10 While the A3 Guildford Tunnel aspiration has some environmental advantages over widening (in particular for residents living close to the A3), the environmental burden of the construction phase will be far higher and aspects such as location of ventilation stacks and their local effect (in all weather conditions) do not appear to have been considered.

Page 14 Under Weaknesses the point about A roads in Guildford Town also applies to surrounding areas in the Borough and beyond. The anticipated improvements ignore existing congestion to the south and east of Guildford – presumably because SCC’s transport assessment methodology only identifies the tip of the iceberg. The current Plan will see increased congestion and a resultant reduction in air quality in many areas beyond the town centre.

Page 16 “Largely commercial bus services” is seen as a strength whereas it should be seen as a weakness with a trend to reduced subsidies and the provision of bus services, especially in rural areas, being increasingly dependent on commercial gain. It is difficult to see this changing under the current Government cuts philosophy. The point “Subject to business case including funding” under Aspirations demonstrates this point.

Page 18 We welcome the aspiration to “Expand the public realm through significantly extended pedestrian-priority areas”

Page 19 Guildford is well behind other areas in monitoring air quality let alone attempting to reduce it.
The introduction talks about reductions in some pollutants. This may be the case for pollutants such as Sulphur Dioxide, which contributed to the visible London smogs, but it is not true of diesel vehicle emissions which have increased as a result of Government policy including its aggressive growth agenda and population increase through immigration.

30 accessible electric vehicle charging points are only an aspiration and will be nowhere near enough if there is a real shift to electric vehicles.

It is clear from the “Strategy outcomes” that GBC would prefer not to follow other areas in pro-actively tackling air quality.

Page 22/23/24 The timescales indicate that the main rail improvements (Including the two new stations) are unlikely to be delivered until the end of the Plan period or even later. The sites that are supposedly justified by their inclusion will generate a major increase in road traffic in the interim and it may be more difficult to achieve this aspect of modal shift in the longer term. The same can be said about the other traffic infrastructure proposals. Residential development is being scheduled before the infrastructure that it will need.

Page 24 Monitoring – “Increase” needs to be in proportion to population growth as otherwise failure will taken as success. “An Increase in average vehicle speeds” is inconsistent with the desire to reduce the number of persons killed or seriously injured. For example, some A roads pass through residential areas where pedestrians, including schoolchildren, are trying to cross the road at peak times. It is noted that increase in vehicle speeds is only desired in the morning. Going home from work does not seem to matter!

Annexe 2

GTAMS

NPPF and NPPG The Plan ignores the points concerning Green Belt and protecting the environment. GBC have tried to get round this by spinning their messages and using misleading statistics including a major understatement of the area of Green Belt to be removed.

Planning Update (March 2015) – The point in this update concerning Green Belt has been ignored

Monitoring Indicators:

Ten years is far too long to wait for information on whether the approach is working or not. The target requires only an increase. This would permit an increase less than that in line with any population growth to be regarded as success. The bar has been set well within the failure range.

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

Attached documents:

Comment ID: pslp171/2653  Respondent: 8858113 / Ramsey Nagaty  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E3

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

14 POLICY E3 MAINTAINING EMPLOYMENT CAPACITY

14.1 I object to the changes in relation to Policy E3 maintaining employment capacity which do not take account of my previous objections to this policy
14.2 I object to the ill-informed policy of resisting change of use from B1a to residential because it flies in the face of positive property market solutions for the regeneration of brownfield land. It is also contrary to current government policy which has recently been reaffirmed and permits a change of use from B1a (offices) to C3 (residential).

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

Attached documents:

Comment ID: PSLPP16/2426  Respondent: 8858433 / Eric Peters  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

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

Policy E3 - Maintaining Employment Capacity and Improving Employment Floorspace

I object. The policy resisting office to residential change of use contradicts government policy.

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

Attached documents:

Comment ID: PSLPP16/2223  Respondent: 8860897 / Julia Shaw  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

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

I do not support the policy of resisting change of use from B1a to residential because it flies in the face of positive property market solutions for the regeneration of brownfield land and is contrary to current government policy which has recently been reaffirmed and permits a change of use from B1a (offices) to C3 (residential).

- I believe that the existing government policy which has recently been made permanent of allowing change of use from B1a to C3 is sound
- Many office buildings reaching an age of more than 30/50 years become redundant in terms of energy compliance making them illegal to occupy for employment purposes and the cost of refurbishment makes them redundant and uneconomic
- The reality of market demand is that the gross development value of refurbished residential space is in excess of the gross development value of refurbished old office space in many locations (this gross development value assessment is supported by the analysis by property consultants GVA in the supporting evidence within the Allies and Morrison Masterplan for Guildford dated 2015)
- Office space is available and the turnover of office space in Guildford is slow, which would seem to indicate that there is excess office capacity relative to demand
- To resist change from B1a to C3 is contrary to the concept of brownfield first for residential development schemes
- To resist change from B1a to C3 in Strategic or Significant Employment Sites is contrary to the concept of integrated mixed use communities whereby the journey to work is minimised
- London has led the way with significant residential schemes being created from redundant office stock. A good example is the South Bank in London adjacent to Waterloo Station where in 2005 the Shell Centre has been converted into flats. Another early example is the 2000 scheme at Metro Central Heights at Elephant and Castle
where the old Alexander Fleming House was converted to 435 flats by St George. GBC needs to adopt more modern trends and policies.

- Guildford is in dire need of increasing town centre residential development
- The feared loss of employment will be marginal and impractical to resist. Empty office blocks are not the answer.
- I regard the evidence base (Employment Land Needs Assessment 2015 and the Guildford Borough Economic Strategy 2013-31) as flawed and inconsistent and therefore unreliable evidence
- In relation to the targets and monitoring indicators, I do not consider that the targets are desirable or sound, and therefore do not consider that the monitoring indicators are valid. Why should Guildford target 3200 additional B class jobs when it has almost full employment? Why should no employment floorspace be lost, when some of it is inappropriate and not fit for purpose? Why is it desirable to increase B1/B2/B8 floorspace?

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

Attached documents:

Comment ID: pslp171/1126  Respondent: 8860897 / Julia Shaw  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E3

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 changes in relation to Policy E3 maintaining employment capacity which do not take account of my previous objections to this policy

I object to the ill-informed policy of resisting change of use from B1a to residential because it flies in the face of positive property market solutions for the regeneration of brownfield land. It is also contrary to current government policy which has recently been reaffirmed and permits a change of use from B1a (offices) to C3 (residential).

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

Attached documents:

Comment ID: PSLPP16/1350  Respondent: 8875233 / Richard Hiam  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

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

1. I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

Attached documents:
1.1 We object to Policy E3 maintaining employment capacity.

1.2 We object to the ill-informed policy of resisting change of use from B1a to residential because it flies in the face of positive property market solutions for the regeneration of brownfield land. It is also contrary to current government policy which has recently been reaffirmed and permits a change of use from B1a (offices) to C3 (residential).

1.3 We believe that the existing government policy which has recently been made permanent of allowing change of use from B1a to C3 is sound.

1.4 Many office buildings reaching an age of more than 30/50 years become redundant in terms of energy compliance making them illegal to occupy for employment purposes and the cost of refurbishment makes them redundant and uneconomic.

1.5 The reality of market demand is that the gross development value of refurbished residential space is in excess of the gross development value of refurbished old office space in many locations (this gross development value assessment is supported by the analysis by property consultants GVA in the supporting evidence within the Allies and Morrison Masterplan for Guildford dated 2015).

1.6 To resist change from B1a to C3 is contrary to the concept of brownfield first for residential development schemes.

1.7 To resist change from B1a to C3 in Strategic or Significant Employment Sites is contrary to the concept of integrated mixed use communities whereby the journey to work is minimised.

1.8 London has led the way with significant residential schemes being created from redundant office stock. A good example is the South Bank in London adjacent to Waterloo Station where in 2005 the Shell Centre has been converted into flats. Another early example is the 2000 scheme at Metro Central Heights at Elephant and Castle where the old Alexander Fleming House was converted to 435 flats by St George. GBC needs to adopt more modern trends and policies.

1.9 Guildford is in dire need of increasing town centre residential development.

1.10 The feared loss of employment will be marginal and impractical to resist. Empty office blocks are not the answer.

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

Attached documents:
I object to E3 because some office space has been empty for years. Some has been pulled down and left for years as derelict land. This suggests there is lack of demand or they need to be refurbished in line with safety regulations to bring them back into use. Government guidance encourages B1a offices be changed to C3 residential. If office space is redundant it needs to be recycled and regenerated, or changed into homes.

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

Attached documents:

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E3 Maintaining employment capacity

Contrary to the statement made, I consider the permitted change of use from Business to Residential in the town centre to be beneficial to the town, and I oppose this attempt to over-rule it. Housing must take precedence over Business use.

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

Attached documents:

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Policy E3 - Maintaining Employment Capacity and Improving Employment Floorspace

I object to permitted development as this is decreasing employment opportunities.

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

Attached documents:
### POLICIES E3 to E7:

We have no comments on these policies.

### 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: PSLPP16/8767</th>
<th>Respondent: 8933185 / Peter See</th>
<th>Agent:</th>
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<td>Page 70 Policy E3: Maintaining Employment Capacity and Improving Employment Floorspace</td>
<td>the loss: any loss</td>
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<td>Note: 5 lines need to be changed in this way</td>
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<td>(3) Outside of: outside and the loss be resisted: and the loss will be resisted</td>
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<th>Agent:</th>
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<tr>
<td><strong>1. I OBJECT to the loss of rural employment (Policy E3)</strong></td>
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<td>Policy E3 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick's Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.</td>
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<th>Comment ID: PSLPP16/16161  Respondent: 8948385 / Gillian Eve  Agent:</th>
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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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<tr>
<td>No comment. This should not be taken to imply support for this policy.</td>
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<tr>
<th>Comment ID: PSLPP16/17303  Respondent: 8967233 / University of Surrey (University of Surrey)  Agent: Terence O'Rourke (Luke Vallins)</th>
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<tbody>
<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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<tr>
<td>The University fully understands the Council’s concerns over any potential future loss of employment floorspace in the borough and is supportive of the proposed measures set out within this policy to resist the loss of employment floorspace. However, it is considered important to clarify within the wording of the policy that it is only applicable to proposals that are not captured by permitted development rights that allow the change of use without planning permission, such as offices into residential accommodation, provided an Article 4 direction is not in place. The following amendments to the policy wording are therefore suggested to ensure the policy reflects development that is capable of taking place without the need for planning permission:</td>
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<tr>
<td>“In order to sustain and enhance employment capacity (including land, floorspace and/or jobs), notwithstanding the provisions set out within the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended), or later amendments to the regulations:…”</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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</table>
3.14 M&G objects to this policy as it is not compliant with national policy on permitted development and, as currently worded, could frustrate the comprehensive redevelopment of the North Street site as proposed in Policy A6. M&G recommends a more flexible approach where redevelopment for alternative uses would assist wider redevelopment objectives in accordance with other Local Plan policies such as Policy A6.

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

Attached documents:

Policy E3: Maintaining employment capacity and improving employment floorspace

I OBJECT to this policy.

I do not support the policy of resisting change of use from B1a to residential because it flies in the face of positive property market solutions for the regeneration of brownfield land and is contrary to current government policy which has recently been reaffirmed and permits a change of use from B1a (offices) to C3 (residential).

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

Attached documents:

POLICY E3 Maintaining employment capacity and improving employment floorspace

OBJECT I do not support the policy of resisting change of use from B1a to residential because it flies in the face of positive property market solutions for the regeneration of brownfield land and is contrary to current government policy which has recently been reaffirmed and permits a change of use from B1a (offices) to C3 (residential).

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

Attached documents:
<table>
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<th><strong>Comment ID:</strong> PSLPP16/14951</th>
<th><strong>Respondent:</strong> 9327009 / sp2 Consulting Limited (Stephen Parker)</th>
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</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy E3</td>
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<tr>
<td><strong>Policy E3: Maintaining Employment Capacity and Improving Employment Floorspace</strong></td>
<td>I object to the changes in relation to Policy E3 maintaining employment capacity which do not take account of my previous objections to this policy. I object to the ill-informed policy of resisting change of use from B1a to residential because it flies in the face of positive property market solutions for the regeneration of brownfield land. It is also contrary to current government policy which has recently been reaffirmed and permits a change of use from B1a (offices) to C3 (residential).</td>
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<th><strong>Comment ID:</strong> PSLPP16/10642</th>
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On balance, Enterprise M3 LEP is supportive of Guildford’s Proposed Submission Local Plan and welcomes the strategy put forward to allow Guildford to continue to play a pivotal role in the economic prosperity of the M3 Corridor as one of the LEPs key Growth Towns. As mentioned above we would encourage the Council to give further consideration on how additional employment sites to meet the demand for office space within the town centre can be incorporated to support the continued growth and prosperity of the town centre going forward. We are very supportive of the increased housing target and would very much welcome the opportunity to work with you to ensure its delivery and to continue to work with you in the positive way which we have done to date.

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

Attached documents:
Royal Mail possess long leases on the two properties in Guildford with no plans to relocate their operations in the near future. The East Horsley Delivery Office site is within freehold ownership and similarly, there are no plans to relocate in the foreseeable future.

Representation

Cushman & Wakefield have reviewed Guildford Borough Council’s Proposed Submission Local Plan: Strategy & Sites 2016 in the context of its impact on the operations of the Royal Mail properties within the Borough. The delivery offices are of strategic importance to Royal Mail in ensuring they are able to continue to fulfil their statutory duty for mail collection and delivery.

Protection of Employment Uses

All three Royal Mail sites are well established, having operated successfully for a number of years, serving a wide catchment area. Due to the nature of use, operations extend well beyond the normal working day, including associated vehicular movements. The potential juxtaposition of alternative, possibly sensitive land uses particularly residential uses adjacent or within close proximity to the sites is therefore of direct concern to our client. Given the business functions of Royal Mail, operations often take place in sensitive hours in the early mornings and late evenings which sees delivery times and the constant movement of delivery vehicles and would therefore result in significant residential / general amenity issues should sensitive land uses/new dwellings be located nearby.

It is therefore suggested that the wording of the following statement should be altered to afford greater protection to existing businesses and, therefore, the protection of employment uses more generally.

The current wording of Policy E3 (Maintaining Employment Capacity and Improving Employment Floorspace) states the following:

In order to sustain and enhance employment capacity (including land, floorspace and/or jobs):

- Employment floorspace will be protected and the loss strongly resisted on the Strategic Employment Sites, which are defined in policy E Change of use will only be acceptable if evidence is provided of active and comprehensive marketing of the site for its current use (offices, research and development or industrial) for a continuous period of at least two years;
- Employment floorspace will be protected and the loss resisted on the Locally Significant Employment Sites, which are defined in policy E Change of use will only be acceptable if evidence is provided of active and comprehensive marketing of the site for its current use (offices, research and development or industrial) for a continuous period of at least 18 months;
- Employment floorspace will be protected in line with latest needs assessment and the loss be resisted outside designated employment sites. Change of use will only be acceptable if evidence is provided of active and comprehensive marketing of the site for its current use (offices, research and development or industrial) for a continuous period of at least 12 months.

Once the period of comprehensive and active marketing is achieved, any other suitable employment use should be considered before change of use to residential or other use will be permitted.

The redevelopment of outmoded employment floorspace will be permitted to cater for modern business needs. The provision of improved ICT infrastructure will be encouraged in refurbished and redeveloped sites.

It is requested that supplementary wording be added to provide robust, ongoing safeguarding to the operations of existing businesses. Suggestive text is provided below:

“Development of a non-employment use will only be permitted when it would not detract from the employment use of the remaining sites in the area and; whether new development or changes of use impact on existing businesses, adequate mitigation measures are designed into the new site”.

In this context, it is considered vital that any new uses in the vicinity of the Delivery Office are designed and managed so that they are both cognisant of, and sensitive to, Royal Mail’s operations. Should sites adjacent to Royal Mail’s
operations come forward for non-employment uses, such as residential or a hotel, they must be designed to attenuate the noise/amenity impact of any existing uses including Royal Mail’s operations and which can include working outside normal working hours. For example, scheme requirements may include amongst other things, triple glazing and due regard to the positioning of windows and private amenity space.

In addition, it may be necessary to manage potential adverse impacts through appropriate planning conditions.

This approach accords with adopted Government guidance set out in the National Planning Policy Framework (NPPF) (March 2012) which advises that local planning authorities should help achieve economic growth by planning proactively to meet the development needs of business and support an economy fit for the 21st century. The NPPF also advises that local planning authorities should support existing business sectors, taking account of whether they are expanding or contracting.

Furthermore, paragraph 123 of the NPPF states that planning policies should aim to recognize that existing businesses wanting to develop in continuance of their business should not have unreasonable restrictions put on them because of changes in nearby land uses since they were established. This is further supported by paragraph 9 of the NPPF, which provides amplification of what might be construed to be circumstances that lead to unreasonable restrictions:

“The planning system should contribute to the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risks from or being adversely affected by, a range of factors including noise pollution.”

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

Attached documents:

Comment ID: PSLPP16/8224  Respondent: 10662849 / Garry Walton  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY E3 - Maintaining employment capacity and improving employment floorspace

I OBJECT. The policy of resisting change of use from B1a to residential flies in the face of positive property market solutions for the regeneration of brownfield land and is contrary to national Government policy which been permits changes of use from B1a (offices) to C3 (residential) and has recently been reaffirmed.

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

Attached documents:

Comment ID: PSLPP16/3842  Respondent: 10702561 / Emily Gamble  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

5. I object to the claims made regarding sustainable employment policy
To pretend that the proposed development at Garlick’s Arch will engender significant employment opportunities is disingenuous. There is already an industrial development south of Burnt Common with brownfield land and infrastructure making it more suitable for development without the stark impact on environment and community.

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

Attached documents:

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**Comment ID:** PSLPP16/13694  **Respondent:** 10782625 / Heather Alexander  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

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

I OBJECT TO POLICY E3 (EMPLOYMENT CAPACITY AND FLOORSPACE):

- Puts unnecessary obstacles in the way of using brownfield land into useful residential housing, contrary to government policy.

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

Attached documents:

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**Comment ID:** PSLPP16/335  **Respondent:** 10799169 / Neal Basson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

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

POLICY E3 Maintaining employment capacity and improving employment floorspace

OBJECT I do not support the policy of resisting change of use from B1a to residential because it flies in the face of positive property market solutions for the regeneration of brownfield land and is contrary to current government policy which has recently been reaffirmed and permits a change of use from B1a (offices) to C3 (residential).

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

Attached documents:

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**Comment ID:** PSLPP16/18381  **Respondent:** 10799169 / Neal Basson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

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?

Full response

- We believe that the existing government policy which has recently been made permanent of allowing change of use from B1a to C3 is sound
- Many office buildings reaching an age of more than 30/50 years become redundant in terms of energy compliance making them illegal to occupy for employment purposes and the cost of refurbishment makes them redundant and uneconomic
- The reality of market demand is that the gross development value of refurbished residential space is in excess of the gross development value of refurbished old office space in many locations (this gross development value assessment is supported by the analysis by property consultants GVA in the supporting evidence within the Allies and Morrison Masterplan for Guildford dated 2015)
- Office space is available and the turnover of office space in Guildford is slow, which would seem to indicate that there is excess office capacity relative to demand
- To resist change from B1a to C3 is contrary to the concept of brownfield first for residential development schemes
- To resist change from B1a to C3 in Strategic or Significant Employment Sites is contrary to the concept of integrated mixed use communities whereby the journey to work is minimised
- London has led the way with significant residential schemes being created from redundant office stock. A good example is the South Bank in London adjacent to Waterloo Station where in 2005 the Shell Centre has been converted into flats. Another early example is the 2000 scheme at Metro Central Heights at Elephant and Castle where the old Alexander Fleming House was converted to 435 flats by St George. GBC needs to adopt more modern trends and policies.
• Guildford is in dire need of increasing town centre residential development
• The feared loss of employment will be marginal and impractical to resist. Empty office blocks are not the answer.
• We regard the evidence base (Employment Land Needs Assessment 2015 and the Guildford Borough Economic Strategy 2013-31) as flawed and inconsistent and therefore unreliable evidence
• In relation to the targets and monitoring indicators, we do not consider that the targets are desirable or sound, and therefore do not consider that the monitoring indicators are valid. Why should Guildford target 3200 additional B class jobs when it has almost full employment? Why should no employment floorspace be lost, when some of it is inappropriate and not fit for purpose? Why is it desirable to increase B1/B2/B8 floorspace?

Annexe 1

Comments on Guildford Borough Transport Study 2016

Page 2 – “address the historic infrastructure deficit” - developers are not required to do this?

Page 2 – It is wrong to claim that the cycle infrastructure along the A25 is good – and many cyclists are not careful, so putting them in contention with pedestrians is not a good idea.

Page 5 – The decision on Heathrow or Gatwick has yet to be taken but airport expansion in the south- east cannot be regarded as sustainable development and, although GBC has no control over such external decisions, its own growth agenda will drive a need for that expansion.

Page 6 An additional weakness is alternative “road closure diversion” routes for the SRN on the LRN

Page 6 Are the “Committed Improvements” actually committed and guaranteed to be delivered?

Page 7 The rail strategy does not provide for Wisley (residents would drive to stations)

Page 7 How long will it take to deliver Crossrail 2? “We hope that Crossrail 2 could be operational by 2030, but we are in the very early stages of planning and no decision to build it has been made.”

Page 7 Guildford platform capacity still many years away if ever.

Page 7 The rail strategy anticipates many improvements that have not been secured and may have unintended consequences if they proceed (see above)

Page 7 The Southern Rail Access to Heathrow #[(see the feasibility study dated December 2015 – although other proposals may be put forward (e.g. by Hounslow)]# is still in its early stages and would have significant impacts on open space beyond our Borough. For example, all options in the feasibility study would use Staines Moor SSSI and Option 4 would use Bedfont Lakes Country Park (a Local Nature Reserve and SNCI).

The various options would use existing commercial, residential and highways land in varying degrees. It seems unlikely that a solution will be delivered within the Plan period and removal of highly valued open space with high biodiversity (wherever it is in South-east England) cannot be regarded as sustainable.

Page 10 and 13 There is a stark contrast between the plans for the town centre which involve encouraging a reduction in traffic by reducing roadspace and the plans for the SRN and parts of the LRN which involve increasing capacity. While increasing capacity may reduce some areas of congestion in the short term, history suggests that traffic will rapidly grow until the improved roads are congested once again. This can hardly be regarded as sustainable. A sustainable option would be to apply a very substantial traffic infrastructure constraint on the housing number.

Page 10 While the A3 Guildford Tunnel aspiration has some environmental advantages over widening (in particular for residents living close to the A3), the environmental burden of the construction phase will be far higher and aspects such as location of ventilation stacks and their local effect (in all weather conditions) do not appear to have been considered.
Under Weaknesses the point about A roads in Guildford Town also applies to surrounding areas in the Borough and beyond. The anticipated improvements ignore existing congestion to the south and east of Guildford – presumably because SCC’s transport assessment methodology only identifies the tip of the iceberg. The current Plan will see increased congestion and a resultant reduction in air quality in many areas beyond the town centre.

“Largely commercial bus services” is seen as a strength whereas it should be seen as a weakness with a trend to reduced subsidies and the provision of bus services, especially in rural areas, being increasingly dependent on commercial gain. It is difficult to see this changing under the current Government cuts philosophy. The point “Subject to business case including funding” under Aspirations demonstrates this point.

We welcome the aspiration to “Expand the public realm through significantly extended pedestrian-priority areas” Guildford is well behind other areas in monitoring air quality let alone attempting to reduce it.

The introduction talks about reductions in some pollutants. This may be the case for pollutants such as Sulphur Dioxide, which contributed to the visible London smogs, but it is not true of diesel vehicle emissions which have increased as a result of Government policy including its aggressive growth agenda and population increase through immigration.

30 accessible electric vehicle charging points are only an aspiration and will be nowhere near enough if there is a real shift to electric vehicles.

It is clear from the “Strategy outcomes” that GBC would prefer not to follow other areas in pro-actively tackling air quality.

The timescales indicate that the main rail improvements (Including the two new stations) are unlikely to be delivered until the end of the Plan period or even later. The sites that are supposedly justified by their inclusion will generate a major increase in road traffic in the interim and it may be more difficult to achieve this aspect of modal shift in the longer term. The same can be said about the other traffic infrastructure proposals. Residential development is being scheduled before the infrastructure that it will need.

Monitoring – “Increase” needs to be in proportion to population growth as otherwise failure will taken as success. “An Increase in average vehicle speeds” is inconsistent with the desire to reduce the number of persons killed or seriously injured. For example, some A roads pass through residential areas where pedestrians, including schoolchildren, are trying to cross the road at peak times. It is noted that increase in vehicle speeds is only desired in the morning. Going home from work does not seem to matter!

Annexe 2

NPPF and NPPG The Plan ignores the points concerning Green Belt and protecting the environment. GBC have tried to get round this by spinning their messages and using misleading statistics including a major understatement of the area of Green Belt to be removed.

Planning Update (March 2015) – The point in this update concerning Green Belt has been ignored

Monitoring Indicators :

Ten years is far too long to wait for information on whether the approach is working or not. The target requires only an increase. This would permit an increase less than that in line with any population growth to be regarded as success. The bar has been set well within the failure range.

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

Attached documents:
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<th>Respondent: 10804961 / M. Basson</th>
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<td>Respondent: 10846625 / Frank Drennan</td>
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I object to Policy E3 “maintaining employment capacity” on the ground that;

1.2 The ill-informed policy of resisting change of use from B1a to residential flies in the face of positive property market solutions for the regeneration of brownfield land. It is also contrary to current government policy which has recently been reaffirmed and permits a change of use from B1a (offices) to C3 (residential).

1.3 That the existing government policy which has recently been made permanent of allowing change of use from B1a to C3 is sound

1.4 Many office buildings reaching an age of more than 30/50 years become redundant in terms of energy compliance making them illegal to occupy for employment purposes and the cost of refurbishment makes them redundant and uneconomic

1.5 The reality of market demand is that the gross development value of refurbished residential space is in excess of the gross development value of refurbished old office space in many locations (this gross development value assessment is supported by the analysis by property consultants GVA in the supporting evidence within the Allies and Morrison Masterplan for Guildford dated 2015)

1.6 To resist change from B1a to C3 is contrary to the concept of brownfield first for residential development schemes.

1.7 To resist change from B1a to C3 in Strategic or Significant Employment Sites is contrary to the concept of integrated mixed use communities whereby the journey to work is minimised.

1.8 London has led the way with significant residential schemes being created from redundant office stock. A good example is the South Bank in London adjacent to Waterloo Station where in 2005 the Shell Centre has been converted into flats. Another early example is the 2000 scheme at Metro Central Heights at Elephant and Castle where the old Alexander Fleming House was converted to 435 flats by St George. GBC needs to adopt more modern trends and policies.

1.9 Guildford is in dire need of increasing town centre residential development.

1.10 The feared loss of employment will be marginal and impractical to resist. Empty office blocks are not the answer.

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

Attached documents:
**Comment ID:** pslp171/2139  **Respondent:** 10847521 / Andrew Procter  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy E3

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 in relation to Policy E3 maintaining employment capacity which do not take account of my previous objections to this policy

1.2 I object to the ill-informed policy of resisting change of use from B1a to residential because it flies in the face of positive property market solutions for the regeneration of brownfield land. It is also contrary to current government policy which has recently been reaffirmed and permits a change of use from B1a (offices) to C3 (residential).

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

Attached documents:

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**Comment ID:** PSLPP16/8859  **Respondent:** 10857889 / William Kyte OBE  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

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 do not support the policy of resisting change of use from B1a to residential which is contrary to current government policy which has recently been reaffirmed and permits a change of use from B1a (offices) to C3 (residential).

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

Attached documents:

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**Comment ID:** PSLPP16/18598  **Respondent:** 10858977 / Angela Otterson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

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

I object to Policy E3 maintaining employment capacity

I object to the ill-informed policy of resisting change of use from B1a to residential because it flies in the face of positive property market solutions for the regeneration of brownfield land. It is also contrary to current government policy which has recently been reaffirmed and permits a change of use from B1a (offices) to C3 (residential).

I believe that the existing government policy which has recently been made permanent of allowing change of use from B1a to C3 is sound

Many office buildings reaching an age of more than 30/50 years become redundant in terms of energy compliance making them illegal to occupy for employment purposes and the cost of refurbishment makes them redundant and uneconomic
The reality of market demand is that the gross development value of refurbished residential space is in excess of the gross development value of refurbished old office space in many locations (this gross development value assessment is supported by the analysis by property consultants GVA in the supporting evidence within the Allies and Morrison Masterplan for Guildford dated 2015).

To resist change from B1a to C3 is contrary to the concept of brownfield first for residential development schemes.

To resist change from B1a to C3 in Strategic or Significant Employment Sites is contrary to the concept of integrated mixed use communities whereby the journey to work is minimised.

London has led the way with significant residential schemes being created from redundant office stock. A good example is the South Bank in London adjacent to Waterloo Station where in 2005 the Shell Centre has been converted into flats. Another early example is the 2000 scheme at Metro Central Heights at Elephant and Castle where the old Alexander Fleming House was converted to 435 flats by St George. GBC needs to adopt more modern trends and policies.

Guildford is in dire need of increasing town centre residential development. The feared loss of employment will be marginal and impractical to resist. Empty office blocks are not the answer.

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

Attached documents:

| Comment ID: pslp171/1951 | Respondent: 10859489 / Jennifer Procter | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E3 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |

1 POLICY E3 MAINTAINING EMPLOYMENT CAPACITY

1.1 I object to the changes in relation to Policy E3 maintaining employment capacity which do not take account of my previous objections to this policy

1.2 I object to the ill-informed policy of resisting change of use from B1a to residential because it flies in the face of positive property market solutions for the regeneration of brownfield land. It is also contrary to current government policy which has recently been reaffirmed and permits a change of use from B1a (offices) to C3 (residential).

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

Attached documents:

| Comment ID: PSLPP16/16020 | Respondent: 10859553 / MARK Curtis | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |

POLICY E3 MAINTAINING EMPLOYMENT CAPACITY

I object to Policy E3 maintaining employment capacity
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I believe that the existing government policy which has recently been made permanent of allowing change of use from B1a to C3 is sound.

Many office buildings reaching an age of more than 30/50 years become redundant in terms of energy compliance making them illegal to occupy for employment purposes and the cost of refurbishment makes them redundant and uneconomic.

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

Attached documents:

Comment ID: pslp171/948  Respondent: 10897633 / A Aldridge  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E3

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

The recent Employment Land Need Assessment shows a reduction in demand of 3.9 hectares for industrial land for the whole borough, so the allocation of 10 hectares at Send, in the Green Belt, is not required in the countryside.

The word 'maximum' in the 2016 plan has been changed to 'minimum', which could permit unlimited industrial development in the Green Belt.

Industrial development in this area will create a great deal of additional car and heavy vehicle traffic and cause frequent gridlocks on the local roads.

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

Attached documents:

Comment ID: PSLPP16/11320  Respondent: 10923297 / Matthew Burnham  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

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

The recent Employment Land Need Assessment shows a reduction in demand of 3.9 hectares for industrial land for the whole borough, so the allocation of 10 hectares at Send, in the Green Belt, is not required in the countryside.

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Attached documents:
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• Puts unnecessary obstacles in the way of using brownfield land into useful residential housing, contrary to government policy.

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Attached documents:
Policy E3 - Maintaining employment capacity and improving employment floorspace – I OBJECT. I do not support the policy of resisting change of use from B1a to residential because it flies in the face of positive property market solutions for the regeneration of brownfield land and is contrary to current government policy which has recently been reaffirmed and permits a change of use from B1a (offices) to C3 (residential).

I object. The policy resisting office to residential change of use contradicts government policy.

I object - this policy is designed to prevent development of brownfield land as housing in contravention of Government policy.
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<td>This policy resists change of use from B1a to C3 residential thus creating obstacles for the regeneration of brownfield land contrary to national government policy. Government policy has confirmed it permits this change ( from B1a offices to residential use).</td>
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<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), <strong>is Sound?</strong> ( No ), <strong>is Legally Compliant?</strong> ( )</td>
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<td>Notwithstanding the comments above, I can detect no clear strategy reflecting the megatrends that will govern the way that we live and work in the future. These I would postulate would depend on improved connectivity and broadband services and the provision of services to an aging population, increased numbers of home workers or remote workers,</td>
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services such as hair dressing/gardening that cannot be provided remotely, increased use of home delivery services and lower use of office space or more shared office space.

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

Attached documents:

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**Comment ID:** pslp171/252  **Respondent:** 11051521 / J and M Baylis  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy E3

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

In Policy E3 (2) and 4.4.28 there should be a stronger reference to the new Appendix A2: this Appendix is a significant strengthening 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:** PSLPP16/8832  **Respondent:** 11071553 / Nicholas Roberts  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

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

POLICY E3 (EMPLOYMENT CAPACITY AND FLOORSPACE) – I object since it will make it harder to use brownfield land for new houses, in breach of government policy.

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

Attached documents:

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**Comment ID:** PSLPP16/14326  **Respondent:** 11080097 / David & Julia Hunt  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

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

I object to Policy E3 maintaining employment capacity I object to the ill-informed policy of resisting change of use from B1a to residential because it flies in the face of positive property market solutions for the regeneration of brownfield land. It is also contrary to current government policy which has recently been reaffirmed and permits a change of use from B1a (offices) to C3 (residential). I believe that the existing government policy which has recently been made permanent of allowing change of use from B1a to C3 is sound Many office buildings reaching an age of more than 30/50 years become redundant in terms of energy compliance making them illegal to occupy for employment purposes and the cost of refurbishment makes them redundant and uneconomic The reality of market demand is that the gross development value of refurbished residential space is in excess of the gross development value of refurbished old office space in many locations (this gross development value assessment is supported by the analysis by property consultants GVA in the supporting evidence within the Allies and Morrison Masterplan for Guildford dated 2015) To resist change from B1a to C3 is contrary to the concept of brownfield first for residential development schemes. To resist change from B1a to C3 in
Strategic or Significant Employment Sites is contrary to the concept of integrated mixed use communities whereby the journey to work is minimised. London has led the way with significant residential schemes being created from redundant office stock. A good example is the South Bank in London adjacent to Waterloo Station where in 2005 the Shell Centre has been converted into flats. Another early example is the 2000 scheme at Metro Central Heights at Elephant and Castle where the old Alexander Fleming House was converted to 435 flats by St George. GBC needs to adopt more modern trends and policies.

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

Attached documents:

Comment ID: PSLPP16/17322  Respondent: 11731841 / Barton Willmore LLP (Emma-Lisa Shiells)  Agent:

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

Representation
Part 1: Policy E3 - Employment Policy

Policy E3 of the emerging Local Plan considers employment capacity. This policy protects employment floorspace within the Borough, this includes Strategic Employment Sites, Locally Significant Employment Sites and existing employment sites that are not specifically allocated for employment use. This could potentially apply to the existing Site given the historic and present employment use which remains on part of the Site.

The Policy sets a requirement for a 12 month active and comprehensive marketing period for the current employment use of the site if it is proposed to change the use of the existing employment site. TCG objects to this Policy as it adds unnecessary barriers for the redevelopment of existing employment sites that are more suited for alternative uses.

Sites that are in an existing employment use, but allocated within the emerging Local Plan for an alternative use, should not be protected by this policy and subject to the requirement of a 12 month marketing period as the site allocation confirms the acceptability of the site for the alternative use. In this regard, the Evidence Base’s identification of the Site for alternative use should offer sufficient justification to override the submission of any further suitability evidence. As such, Policy E3 should be amended to exclude the marketing requirement for existing employment sites allocated for an alternative use within the Local Plan. The third bullet point of Policy E3 relating to employment floorspace outside designated employment sites should be reworded as follows (our additions):

"Employment floorspace will be protected in line with latest needs assessment and the loss be resisted outside designated employment sites, unless the site is allocated for an alternative use. Change of use will only be acceptable if evidence is provided of active and comprehensive marketing of the site for its current use (offices, research and development or industrial) for a continuous period of at least 12 months. If the site is allocated for an alternative use within the Local Plan, the marketing period is not required”.

This is considered acceptable as it will deliver sites that have been allocated as suitable for alternative uses and required to deliver the overall plan strategy. It will also ensure the deliverability of the site allocation and the important contribution it makes towards the Plan’s residential targets.

The NPPF (Paragraph 22) highlights that planning policy should avoid the long term protection of sites for employment use where there is no reasonable prospect of the site being used for that purpose. Therefore to ensure the emerging Local Plan is consistent with National Policy in terms of being ‘sound’ (NPPF, Paragraph 182), flexibility should be applied to this policy to allow the release of employment sites where there is not considered to be a reasonable prospect of the Site being used for that purpose.
Comment ID: PSLPP16/2493  Respondent: 14143457 / Hermes Investment Management Limited  Agent: Turley (P Keywood)
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

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

It is not considered that Policy E3 as worded is sound on the basis it is not compliant with NPPF paragraph 22.

NPPF paragraph 22 states that planning policies should avoid the long term protections of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. The proposed current wording does not provide enough flexibility to avoid the forced protection of sites which are no longer considered suitable for employment use.

The third bullet of the policy (which relates to resisting the loss of all employment uses outside of Strategic Employment Sites and Locally Significant Employment Sites, as defined in Policy E1) and requiring evidence of marketing will also cover sites within Guildford Town Centre. This blanket approach is unreasonable and unrealistic, and would serve to prevent prompt redevelopment in response to fast-moving markets demands for ‘Town Centre’ uses that are encouraged and supported by the NPPF. Town Centre uses normally generate employment and other economic benefits in their own right. With the third bullet applying as at present to town centres it will also present a barrier to residential development in a sustainable location which will also support town centre vitality and viability. Re-population of town centres is generally considered a desirable; adding to the activity in the centre, facilitating the redevelopment or re-use of under-used or vacant sites and buildings; in a sustainable location. The NPPF recognises the need for planning policy to react quickly to the changing economic climate, which will be prevented with the policy as currently worded. It therefore runs counter to the NPPF.

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

19 POLICY E3 MAINTAINING EMPLOYMENT CAPACITY
19.1 I object to Policy E3 maintaining employment capacity
19.2 I object to the ill-informed policy of resisting change of use from B1a to residential because it flies in the face of positive property market solutions for the regeneration of brownfield land. It is also contrary to current government policy which has recently been reaffirmed and permits a change of use from B1a (offices) to C3 (residential).
19.3 I believe that the existing government policy which has recently been made permanent of allowing change of use from B1a to C3 is sound
19.4 Many office buildings reaching an age of more than 30/50 years become redundant in terms of energy compliance making them illegal to occupy for employment purposes and the cost of refurbishment makes them redundant and uneconomic.

19.5 The reality of market demand is that the gross development value of refurbished residential space is in excess of the gross development value of refurbished old office space in many locations (this gross development value assessment is supported by the analysis by property consultants GVA in the supporting evidence within the Allies and Morrison Masterplan for Guildford dated 2015).

19.6 To resist change from B1a to C3 is contrary to the concept of brownfield first for residential development schemes.

19.7 To resist change from B1a to C3 in Strategic or Significant Employment Sites is contrary to the concept of integrated mixed use communities whereby the journey to work is minimised.

19.8 London has led the way with significant residential schemes being created from redundant office stock. A good example is the South Bank in London adjacent to Waterloo Station where in 2005 the Shell Centre has been converted into flats. Another early example is the 2000 scheme at Metro Central Heights at Elephant and Castle where the old Alexander Fleming House was converted to 435 flats by St George. GBC needs to adopt more modern trends and policies.

19.9 Guildford is in dire need of increasing town centre residential development.

19.10 The feared loss of employment will be marginal and impractical to resist. Empty office blocks are not the answer.

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

Attached documents:

Comment ID: pslp171/701  Respondent: 15084897 / Save Send Action Group (Andrew Procter)  Agent:  

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy E3

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

14.1 I object to the changes in relation to Policy E3 maintaining employment capacity which do not take account of my previous objections to this policy.

14.2 I object to the ill-informed policy of resisting change of use from B1a to residential because it flies in the face of positive property market solutions for the regeneration of brownfield land. It is also contrary to current government policy which has recently been reaffirmed and permits a change of use from B1a (offices) to C3 (residential).

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

Attached documents:

Comment ID: PSLPP16/8925  Respondent: 15107297 / Ian McQuattie  Agent:  

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT TO POLICY E3 (EMPLOYMENT CAPACITY AND FLOORSPACE):

Puts unnecessary obstacles in the way of using brownfield land into useful residential housing, contrary to government policy.

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

Attached documents:

Comment ID: PSLPP16/13742  Respondent: 15227905 / Nigel Alexander  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY E3 (EMPLOYMENT CAPACITY AND FLOORSPACE):
• Puts unnecessary obstacles in the way of using brownfield land into useful residential housing, contrary to government policy.

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

Attached documents:

Comment ID: PSLPP16/2286  Respondent: 15239169 / First Regional Estates Ltd (Daniel Goldberg)  Agent: GL Hearn Limited (Paul Woods)
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Policy E3 seeks to maintain employment capacity through the protection of employment land. Three categories of employment floor space are specified related to Strategic Employment Sites, Locally Significant Employment Sites and other employment floor space outside designated employment sites.

Whilst we acknowledge the Council’s desire to protect employment floor space within the designated employment areas, we consider that protection of undesignated floor space, in particular office floorspace, with evidence of marketing expected over at least a 12 month period is too onerous having regard to the balance of need for alternative uses.

Paragraph 22 of the National Planning Policy Framework (NPPF) indicates that planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. The NPPF notes that where there is no reasonable prospect, applications for alternative uses of land and buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.

On 13 October 2015, the Government announced that the temporary permitted development rights allowing change of use from offices to residential would be made permanent and these rights have since been confirmed through amendments to the General Permitted Development Order. The Housing and Planning Minister, Brandon Lewis, said at the time of the announcement: “We’re determined that, both in Whitehall and in town halls, everything is done to get the homes we need built. Today’s measures will mean we can tap into the potential of underused buildings to offer new homes for first-time
buyers and families long into the future, breathing new life into our neighbourhoods and at the same protecting our precious green belt”.

Such an approach is particularly pertinent to an area such as Guildford which is surrounded by green belt and which currently only has a 2.4 year supply of specific deliverable housing sites based on the Council’s latest Annual Monitoring Report for 2014/2015 published in October 2015.

Having regard to the above, we consider that the policy as currently drafted is unsound on the basis that it is not justified. It does not provide the most appropriate strategy having regard to the clear need to deliver new housing within the Borough.

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

Attached documents:

**Comment ID:** PSLPP16/1740  **Respondent:** 15244641 / Wesley Raynbird-Tilbury  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

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

POLICY E3 - Maintaining employment capacity and improving employment floorspace

I OBJECT. The policy of resisting change of use from B1a to residential flies in the face of positive property market solutions for the regeneration of brownfield land and is contrary to national Government policy, recently reconfirmed, which permits changes of use from B1a (offices) to C3 (residential).

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

Attached documents:

**Comment ID:** PSLPP16/1808  **Respondent:** 15247265 / Aileen Aitcheson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

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

POLICIES E3 to E7:

I have no comments on these policies.

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

Attached documents:

**Comment ID:** PSLPP16/1832  **Respondent:** 15247745 / Brian Aitcheson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICIES E3 to E7:

I have no comments on these policies.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10953</th>
<th>Respondent: 15282625 / Kelly Graves</th>
<th>Agent:</th>
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I OBJECT TO POLICY E3 (EMPLOYMENT CAPACITY AND FLOORSPACE):

• Puts unnecessary obstacles in the way of using brownfield land into useful residential housing, contrary to government 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: PSLPP16/14220</th>
<th>Respondent: 15299201 / Samira Abdullah</th>
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I object to Policy E3 maintaining employment capacity I object to the ill-informed policy of resisting change of use from B1a to residential because it flies in the face of positive property market solutions for the regeneration of brownfield land. It is also contrary to current government policy which has recently been reaffirmed and permits a change of use from B1a (offices) to C3 (residential). I believe that the existing government policy which has recently been made permanent of allowing change of use from B1a to C3 is sound Many office buildings reaching an age of more than 30/50 years become redundant in terms of energy compliance making them illegal to occupy for employment purposes and the cost of refurbishment makes them redundant and uneconomic. The reality of market demand is that the gross development value of refurbished residential space is in excess of the gross development value of refurbished old office space in many locations (this gross development value assessment is supported by the analysis by property consultants GVA in the supporting evidence within the Allies and Morrison Masterplan for Guildford dated 2015). To resist change from B1a to C3 is contrary to the concept of brownfield first for residential development schemes. To resist change from B1a to C3 in Strategic or Significant Employment Sites is contrary to the concept of integrated mixed use communities whereby the journey to work is minimised. London has led the way with significant residential schemes being created from redundant office stock. A good example is the South Bank in London adjacent to Waterloo Station where in 2005 the Shell Centre has been converted into flats. Another early example is the 2000 scheme at Metro Central Heights at Elephant and Castle where the old Alexander Fleming House was converted to 435 flats by St George. GBC needs to adopt more modern trends and policies.

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

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<th>Comment ID: PSLPP16/2873</th>
<th><strong>Respondent:</strong> 15301089 / Brian Yeomans</th>
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<td>I OBJECT to this policy.</td>
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<td>I do not support the policy of resisting change of use from B1a to residential because it flies in the face of positive property market solutions for the regeneration of brownfield land and is contrary to current government policy which has recently been reaffirmed and permits a change of use from B1a (offices) to C3 (residential).</td>
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<th><strong>Respondent:</strong> 15377953 / cctvtraining.com ltd (Gordon Tyerman)</th>
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I object to POLICY E3 - Maintaining employment capacity and improving employment floorspace

- Puts unnecessary obstacles in the way of using brownfield land into useful residential housing, contrary to government policy.

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Comment ID: PSLPP16/8433  Respondent: 15466177 / D.L. + E.J. Wilkinson  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E3
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I OBJECT TO POLICY E3 (EMPLOYMENT CAPACITY AND FLOORSPACE):
• Puts unnecessary obstacles in the way of using brownfield land into useful residential housing, contrary to government policy.

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

Attached documents:

Comment ID: PSLPP16/8926  Respondent: 15478017 / Kirstie Pankhurst  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E3
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Attached documents:

Comment ID: PSLPP16/10039  Respondent: 15495873 / Gerard Duvé  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Maintaining Employment Capacity and Improving Employment Floorspace
I object to permitted development as this is decreasing employment opportunities.

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

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<th>Comment ID: PSLPP16/11258</th>
<th>Respondent: 15570145 / Owen Eszeki</th>
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POLICY E3 MAINTAINING EMPLOYMENT CAPACITY

I object to Policy E3 maintaining employment capacity.

I object to the ill-informed policy of resisting change of use from B1a to residential because it flies in the face of positive property market solutions for the regeneration of brownfield land. It is also contrary to current government policy which has recently been reaffirmed and permits a change of use from B1a (offices) to C3 (residential).

I believe that the existing government policy which has recently been made permanent of allowing change of use from B1a to C3 is sound.

Many office buildings reaching an age of more than 30/50 years become redundant in terms of energy compliance making them illegal to occupy for employment purposes and the cost of refurbishment makes them redundant and uneconomic.

The reality of market demand is that the gross development value of refurbished residential space is in excess of the gross development value of refurbished old office space in many locations (this gross development value assessment is supported by the analysis by property consultants GVA in the supporting evidence within the Allies and Morrison Masterplan for Guildford dated 2015).

To resist change from B1a to C3 is contrary to the concept of brownfield first for residential development schemes.

To resist change from B1a to C3 in Strategic or Significant Employment Sites is contrary to the concept of integrated mixed use communities whereby the journey to work is minimised.

London has led the way with significant residential schemes being created from redundant office stock. A good example is the South Bank in London adjacent to Waterloo Station where in 2005 the Shell Centre has been converted into flats. Another early example is the 2000 scheme at Metro Central Heights at Elephant and Castle where the old Alexander Fleming House was converted to 435 flats by St George. GBC needs to adopt more modern trends and policies.

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: PSLPP16/16272  Respondent: 15603361 / Ann Watkins  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

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

I OBJECT TO POLICY E3 (EMPLOYMENT CAPACITY AND FLOORSPACE): • Puts unnecessary obstacles in the way of using brownfield land into useful residential housing, contrary to government policy.

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

Attached documents:

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Comment ID: PSLPP16/15411  Respondent: 15614497 / Hannah Yandle  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

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Comment ID: PSLPP16/15702  Respondent: 15619041 / Jack Cross  Agent:

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<th>Respondent: 15623745 / Stella May</th>
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<th>Respondent: 15640897 / Jackie van Heesewijk</th>
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1. I OBJECT to the loss of rural employment (Policy E3)

Policy E3 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

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

I object to Policy E3 maintaining employment capacity

I object to the ill-informed policy of resisting change of use from B1a to residential because it flies in the face of positive property market solutions for the regeneration of brownfield land. It is also contrary to current government policy which has recently been reaffirmed and permits a change of use from B1a (offices) to C3 (residential).

I believe that the existing government policy which has recently been made permanent of allowing change of use from B1a to C3 is sound

Many office buildings reaching an age of more than 30/50 years become redundant in terms of energy compliance making them illegal to occupy for employment purposes and the cost of refurbishment makes them redundant and uneconomic

The reality of market demand is that the gross development value of refurbished residential space is in excess of the gross development value of refurbished old office space in many locations (this gross development value assessment is supported by the analysis by property consultants GVA in the supporting evidence within the Allies and Morrison Masterplan for Guildford dated 2015)

To resist change from B1a to C3 is contrary to the concept of brownfield first for residential development schemes.

To resist change from B1a to C3 in Strategic or Significant Employment Sites is contrary to the concept of integrated mixed use communities whereby the journey to work is minimised.

London has led the way with significant residential schemes being created from redundant office stock. A good example is the South Bank in London adjacent to Waterloo Station where in 2005 the Shell Centre has been converted into flats.
Another early example is the 2000 scheme at Metro Central Heights at Elephant and Castle where the old Alexander Fleming House was converted to 435 flats by St George. GBC needs to adopt more modern trends and policies.

**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: PSLPP16/17678</th>
<th>Respondent: 15693153 / Zurich Assurance Ltd</th>
<th>Agent: Barton Willmore LLP (Sinéad Morrissey)</th>
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<td>Policy E3 seeks to “sustain and enhance” employment capacity (land, floorspace and jobs) in the Borough. It advises that employment floorspace will be protected across the Borough, particularly on the Strategic Employment Sites and Locally Significant Employment Sites, unless marketing evidence (varying levels of detail dependent on the site’s employment status) is provided to justify its loss. Zurich supports GBC’s intent within Policy E3 however considers that the policy is too rigid and should be more flexibly worded to allow for other forms of evidence (such as: viability, building/structural survey evidence, local market assessment and employment land study) to justify the loss of employment floorspace. Each proposal should be considered on a site by site basis. Furthermore, sites that are in an existing employment use, but allocated within the emerging Local Plan for an alternative use (such as Broadford Business Park), should not be protected by this policy and subject to the marketing requirement, as the site allocation confirms the acceptability of the site for the alternative use. The policy wording should be changed to reflect 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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<td>This policy places an unnecessary level of restriction in proposing to place significant restrictions on the loss of floorspace outside of ‘designated employment sites.’ The best employment sites have been assessed as part of the Evidence Base and are specifically protected. Policies E1 and E2 also reflect the guidance of the NPPF and are positively worded. Policy E3, however, goes too far and does not reflect the guidance set out at paragraph 22 of the NPPF. The subtext, paragraph 4.4.25 refers specifically to the loss of office space as a driver for retaining employment land, however, the Council should consider other more specifically targeted mechanisms to protect office space e.g. Article 4 direction.</td>
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The reliance on marketing for a period of 12 months will stifle redevelopment for other uses, in particular residential development. The prescriptive guidance at paragraph 4.4.27 is also too draconian and has no place in positive plan making.

Any restrictions on designated sites should also allow for a balanced judgement to be made including impact on neighbouring uses and other considerations, including the Council’s current housing supply position.

Alternative use should also not be prejudiced by the need to assess any other suitable employment use prior to residential use.

Importantly, the policy should make it explicitly clear that these restrictions should not apply to any Site Allocations.

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 2017 / Policy E3

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

1.68 The revised policy wording continues to place an unnecessary level of restriction on the loss of floorspace outside of ‘designated employment sites.’

1.69 The best employment sites have been assessed as part of the Evidence Base and it is proposed will be subject to extensive protection.

1.70 Policies E1 and E2 reflect the guidance of the NPPF and are positively worded. Policy E3, however, goes too far and does not reflect the guidance set out at paragraph 22 of the NPPF. The subtext, paragraph 4.4.25 refers specifically to the loss of office space as a driver for retaining employment land, however, the Council could consider other more specifically targeted mechanisms to protect office space e.g. An Article 4 direction.

1.71 The reliance on marketing for a period of 12 months will stifle redevelopment for other uses, in particular residential development. The prescriptive guidance at paragraph 4.4.27 is also too draconian and has no place in positive plan making.

1.72 The quality and location of employment land should also play a role in decision making and the Council must also allow for a balanced judgement to be made to include an assessment of the impact on neighbouring uses and the pressing need for other forms of development, most notably housing.

1.73 As set out in the Guildford Borough Employment Land Needs Assessment 2017 (Page ii) there is a healthy existing pipeline of 38,357 sqm of consented floorspace for B1c, B2 and B8 uses.

1.74 Alternative use should also not be prejudiced by the need to assess any other suitable employment use prior to residential use.

1.75 Most crucially, the policy still fails to make it explicitly clear that these restrictions will not apply to Site Allocations where these are designated for alternative uses.

UNSOUND: The wording of the Third Bullet point should be amended as follows:
• Employment floorspace which is not otherwise allocated for development in the Plan will be protected in line with latest need assessments. Redevelopment to alternative use will, be permitted where it can be demonstrated that; there is no longer a requirement for employment use, the site is no longer suitable for employment uses or the site has a negative impact on surrounding uses.

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

Attached documents:

Comment ID: pslp171/1248  Respondent: 15805601 / Guildford Greenbelt Group (Sir or madam)  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy E3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We object to the changes in relation to Policy E3 maintaining employment capacity which do not take account of my previous objections to this policy

We object to the ill-informed policy of resisting change of use from B1a to residential because it flies in the face of positive property market solutions for the regeneration of brownfield land. It is also contrary to current government policy which has recently been reaffirmed and permits a change of use from B1a (offices) to C3 (residential).

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

Attached documents:

Comment ID: PSLPP16/15561  Respondent: 15977889 / Charles Kimpton  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

OBJECT. Recent Government policy reaffirms a change of use from B1a to C3 / office to residential so we do not support the plan’s policy of resisting this change.

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

Attached documents:

Comment ID: pslp171/1179  Respondent: 17343361 / Zurich Assurance Limited  Agent: Barton Willmore LLP (Gary Stevens)
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy E3
Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( Yes ), is Legally Compliant? ( Yes )

Refer to attached report for confirmation of our client's support for the proposed revisions to Policy E3.
5.1 Policy E3 seeks to “sustain and enhance” employment capacity (land, floorspace and jobs) in the Borough. It advises that employment floorspace will be protected across the Borough, particularly on the Strategic Employment Sites and Locally Significant Employment Sites, unless marketing evidence (varying levels of detail dependent on the site’s employment status) is provided to justify its loss.

5.2 Zurich supports the flexibility that has been included in the revised wording of Policy E3 and the clear guidance provided in Appendix A2, particularly in terms of the evidence required to justify the loss of an employment use. The proposed checklist included within a new SPD to appraise evidence of marketing and to ensure a consistent approach is taken for all application is equally welcome.

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

Attached documents: 170724 - Broadford Business Park Reg 19 Reps (FINAL).pdf (704 KB)

Comment ID: pslp171/3278  Respondent: 17417729 / The Co-operative Group and Scape Living (TCG SL)  Agent: Barton Willmore (Ben Shaw)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E3

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

[attachment reproduced below]

24. We repeat our previous representation in July 2016 in relation to draft Policy E3. Draft Policy E3 of the emerging Local Plan considers employment capacity. This policy protects employment floorspace within the Borough, this includes Strategic Employment Sites, Locally Significant Employment Sites and existing employment sites that are not specifically allocated for employment use. This could potentially apply to the existing Site given the historic and present employment use which remains on part of the Site.

25. The Policy sets a requirement for a 12 month active and comprehensive marketing period for the current employment use of the site if it is proposed to change the use of the existing employment site. TCG objects to this Policy as it adds unnecessary barriers for the redevelopment of existing employment sites that are more suited for alternative uses.

26. Sites that are in an existing employment use, but allocated within the emerging Local Plan for an alternative use, should not be protected by this Policy and subject to the requirement of a 12 month marketing period as the site allocation confirms the acceptability of the site for the alternative use. In this regard, the Evidence Base’s identification of the Site for alternative use should offer sufficient justification to override the submission of any further suitability evidence. As such, Policy E3 should be amended to exclude the marketing requirement for existing employment sites allocated for an alternative use within the Local Plan. The third bullet point of Policy E3 relating to employment floorspace outside designated employment sites should be reworded as follows (our additions):

• Employment floorspace will be protected in line with latest needs assessment and the loss be resisted outside designated employment sites, unless the site is allocated for an alternative use. Change of use will only be acceptable if evidence is provided of active and comprehensive marketing of the site for its current use (of offices, research and development or industrial) for a continuous period of at least 12 months. If the site is allocated for an alternative use within the Local Plan, the marketing period is not required.

27. This is considered acceptable as it will deliver sites that have been allocated as suitable for alternative uses and required to deliver the overall plan strategy. It will also ensure the deliverability of the site allocation and the important contribution it makes towards the Plan’s residential targets.
28. The NPPF (Paragraph 22) highlights that planning policy should avoid the long term protection of sites for employment use where there is no reasonable prospect of the site being used for that purpose. Therefore to ensure the emerging Local Plan is consistent with National Policy in terms of being ‘sound’ (NPPF, Paragraph 182), flexibility should be applied to this policy to allow the release of employment sites where there is not considered to be a reasonable prospect of the Site being used for that purpose.

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 E4 - Surrey Research Park
The Guildford Society supports the protection of the Surrey Research Park in Policy E4, and recognises the need to expand the park by 10Ha, even though we regret the incursion onto Green Belt land. We believe there needs to be sufficient expansion space for the Research Park in this plan and safeguarded for subsequent plans.

The Society agrees that Surrey Research Park is a critical economic resource for the borough. It is aware that the Research Park is in danger of suffering from limits being placed on its growth due to infrastructure issues, e.g. access to A3, difficulties getting to airports etc. We believe it is important to ensure the park is well linked to high quality space in the town centre, Pirbright and other centres. We therefore support the Guildford West station as one means to create a sustainable transport link to the town centre. We note the plan is silent on how Surrey Research Park to Pirbright links might be supported.

POLICY E4: Surrey Research Park

WHPC has no comments on 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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<th>Comment ID:</th>
<th>PSLPP16/2190</th>
<th>Respondent:</th>
<th>8570273 / Fiona Curtis</th>
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I object to policy E4 Surrey research Park. I support the maintenance of research, development and design activities, in any science, including social science, that is complementary to the activities of the University of Surrey at the Surrey Research Park. I object however to the completely unnecessary expansion of the Research Park into a larger Business Park. I believe that the planning policy going forward for the Surrey Research Park should be to maintain and enhance the integrity of its research base allowing for the economic value add to the local economy of knowledge and technology transfer from the University. I believe that B1b should be the primary use class for the Research Park and that applications for B1a should be resisted due to the danger of dilution of the core purpose and reputation of the park. I object to the inclusion of B1c uses which is inappropriate and unnecessary. Research parks based on the early UK technology transfer exemplars of the Cambridge and Oxford need careful monitoring, nurturing and protection to ensure the integrity and quality of the park is maintained and the park continues to be a destination for innovation and enterprise. There is a danger for research parks to be overwhelmed by short sighted development opportunities being taken by park managers provided by standard office activities and administrative functions which in time turn them into standard business parks which can be found anywhere in the country. Their relative low density and attractiveness make them targets for “any other” office user. Research parks that lose their way stop being the location of choice for new innovative enterprises.

I hope the Surrey Research Park in Guildford remains focussed on a broad spectrum of scientific research including computer science, bio-chemistry, design, space-science, eco-science, health science, software development, laser technology, media-science, artificial intelligence, robotics and super-manufacturing. Monitoring indicators should include new start-ups and new patents created. Facilities should be provided whereby new small businesses can secure premises under subsidised licence fee arrangements with no onerous rent or lease commitments! I support the idea of a variety of sizes of unit including some small units (between 15 – 80 sq m) bearing in mind one workstation is 10 sq m. Consideration should be given to the concept of shared “enterprise hubs” where individuals can take pay as you go workstations in shared spaces similar to touch down business centres similar to the “enterprise village” concept! I object to the policy of any new extension of the research park more than the existing 14% already provided for within the park or within the footprint of the park. The Surrey Research Park currently extends to 65,000 sq m. There is already granted consent to expand to a further 9,000 sq m (14%) This space has been available for 10 years and is still to find a taker. The past trend of expansion of Office/R & D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis. The ELNA 2015 calculated annual floor space demand is 0.7% The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period. The necessary growth in floor space over the plan period is therefore 17 years x 0.7 = 12% which is less than the current expansion space of 14%. The research park is developed at a plot ratio of 25%. This could be increased to 50% within the same footprint of the existing park without damage to its amenity. The actual current land use for development in the park is in fact only 12.5% because most buildings are 2-storey.

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

Attached documents:
| **Policy** | **E4 4** | I believe that proof of a business being non viable before change of use, should remain (this has been removed) as easing the way to change of use increases value and restricts stock. This should not prevent business premises from being re-housed, where housing is a priority or where new transport hubs improve economic viability.

I can see no reason why restrictions on change of use should not apply to other classes of business? |
| **E4 Surrey Research Park** | | |
| **4.4.34 The NPPF** | A sentence is included from the NPPF that supports local business. This however must be balanced with all other parts of the NPPF, including the protection of the Greenbelt, historic environment and development or growth must be sustainable. I strongly object to the use of what was Greenbelt land being used for 'low density' business. Permitting low rise office and research space with vast levels of landscape and surface car park puts huge pressure on the borough to release more Greenbelt and this is not sustainable. |
| **4.4.38 Omission** | The plan notes the Park's location in relation to the A3, Sports centre and Holiday Inn but omits to include two key sites that lead to high volume traffic, namely the Tesco super store and the Hospital. |
| **4.4.40 removal of detail relating to the new extension** | The plan could retain this information. 'Mixed use' development is far too generic. |
| **4.4.40** | I would like to see further detail relating to floor space used, density and use of other space such as car parks and landscaping. I am concerned that this land is not being used efficiently. The Local Plan must include policies that ensure space is well used ie multi-storey or subterranean car parking, medium density building and type of business. Failure to do so, could see the research park being used for other types of business which would not necessarily be in keeping with the overall ethos and direction that Guildford aspires to. |
| **4.4.37 omission** | The original planning permission also stipulated that traffic should not increase by more than 5%. An independent review is needed to verify traffic flows as data produced by the University is not impartial and has manipulated results by removing sections of traffic deemed to be excluded? I attach a clip from Surrey mail 1988 in which the University seeks to prevent planning permission for the Tesco development on the basis of traffic issues. In almost 30 years, traffic is markedly worse than it was then and forecasters of congestion at this point have been proven correct. Traffic is a major issue at this point and failure to effectively deal with it as well as deal with |
future growth will affect the integrity of the whole Plan and put other businesses at risk (as many
will leave due to congestion) as was proven by the evidence base.

| Policy E4 | Proposals should be designed and landscaped to maximize use of land as well as complementing the setting. |

| 4.4.1 | The density usage of 30,000 sq m in 10 hectares is an outrageous waste of space. 30,000 sq m could be incorporated into existing space whilst maintaining its character and without releasing more Greenbelt land at this stage. The existing site is now brownfield and must be optimally utilized before spread is permitted. I strongly oppose plans for low lying sprawl especially for commercial use. Land must be used wisely. Any plan that focuses on delivering timescales as a mark of success but does not monitor the quality or quantity against the wider plan and NPPF cannot be sustainable. Permitting sprawl on this scale will reduce scope for development and ability to enjoy our countryside setting for future generations. This is against the principals of sustainability and the NPPF |

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

Attached documents:

Comment ID: PSLPP16/13043  Respondent: 8573793 / Harry Eve  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object
68. I am not convinced that the permitted area of the Research Park needs further expansion and the policy appears to involve a weakening of the range of permitted uses that could undermine the appeal of the site for the type of business enterprises for which it is intended.

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

Attached documents:

Comment ID: PSLPP16/17558  Respondent: 8581505 / Burpham Neighbourhood Forum (Jim Allen)  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
The policy should seek to enhance research and innovation aspects restricting the Site to B1b only with and Article 4 direction on this site.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/2200</th>
<th>Respondent: 8581505 / Burpham Neighbourhood Forum (Jim Allen)</th>
<th>Agent:</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>
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4.4.40

The current Surrey Research Park boundary expands into Blackwell Farm (site A26). The Research Park boundary needs to be re-defined to keep the special nature of the area; the map should be re-drawn to show the changes.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15526</th>
<th>Respondent: 8585601 / Jennie Kyte</th>
<th>Agent:</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>
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Policy E4:  
Surrey Research Park

The Surrey Research Park should be reserved for research purposes only and not for normal businesses. It should not expand onto Blackwell Farm.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/2456</th>
<th>Respondent: 8585601 / Jennie Kyte</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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</tbody>
</table>

POLICY E4:  
Surrey Research Park

4.4.41  
Surrey Research Park is built with low density and has not made efficient use of land.
I object to this development

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

Attached documents:

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Comment ID: PSLPP16/8074  Respondent: 8587489 / University of Surrey (Malcolm Parry)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

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

I am supportive of Policy E4 “Surrey Research Park”,

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

Attached documents:

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Comment ID: PSLPP16/11200  Respondent: 8602337 / Cross Group (Mr Colin Cross)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

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

Policy E4 - Surrey Research Park

I support the Research Park and its specialism, but I object to the current need to expand. The land hungry current ground level car parking for Research Park should be utilised for shared multi-storey or underground parking and the freed-up car parks used for the Park development. All new Research Park development should include underground car parking, as in other countries.

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

Attached documents:

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Comment ID: pslp171/2572  Respondent: 8605889 / Surrey County Council (Sue Janota)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E4

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

Policy E4 - Surrey Research Park

To monitor this policy we would still argue that a definition needs to be included on research that is complimentary to the activities of the University of Surrey based on the original outline planning permission or defined in terms of Standard Industrial Classification Codes.

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

Attached documents:
Comment ID: PSLPP16/9091  Respondent: 8609377 / Mr Andy White  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E4
Do you consider this section of the document; complies with the Duty to Cooperate?  ( ), is Sound?  ( ), is Legally Compliant?  ( )

This should be amended to only Class B1B to maintain the special status of the Research Park. An article 4 Directive should also be considered.

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

Comment ID: PSLPP16/9848  Respondent: 8627393 / Worplesdon Parish Council (Gaynor White)  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E4
Do you consider this section of the document; complies with the Duty to Cooperate?  ( ), is Sound?  ( ), is Legally Compliant?  ( )

E4  Surrey Research Park  Support.

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

Comment ID: PSLPP16/460  Respondent: 8640353 / Julian Cranwell  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E4
Do you consider this section of the document; complies with the Duty to Cooperate?  ( ), is Sound?  ( ), is Legally Compliant?  ( )

Policy E4: Surrey Research Park

Response

Summary

I support the maintenance of research, development and design activities, in any science, including social science, that is complementary to the activities of the University of Surrey at the Surrey Research Park. I do not believe that there is a need to expand the Research Park into a larger Business Park. I believe that the planning policy going forward for the Surrey Research Park should be to maintain and enhance the integrity of its research base allowing for the economic value add to the local economy of knowledge and technology transfer from the University. I believe that B1b (should be the primary use class for the Research Park and that applications for B1a should be resisted due to the danger of dilution of the core purpose and reputation of the park. I do not believe the inclusion of B1c uses is appropriate or necessary.
Detailed response:

- Research parks based on the early UK technology transfer exemplars of the Cambridge and Oxford need careful monitoring, nurturing and protection to ensure the integrity and quality of the park is maintained and the park continues to be a destination for innovation and enterprise.

- There is a danger for research parks to be overwhelmed by short-sighted development opportunities being taken by park managers provided by standard office activities and administrative functions which in time turn them into standard business parks which can be found anywhere in the country. Their relative low density and attractiveness make them targets for “any other” office user.

- Research parks that lose their way stop being the location of choice for new innovative enterprises.

- The Surrey Research Park in Guildford needs to be focused on a broad spectrum of scientific research including computer science, bio-chemistry, design, space-science, eco-science, health science, software development, laser technology, media-science, artificial intelligence, robotics and super-manufacturing.

- Monitoring indicators should include new start-ups and new patents created.

- Facilities should be provided whereby new small businesses can secure premises under subsidised licence fee arrangements with no onerous rent or lease commitments.

- I support the idea of a variety of sizes of unit including some small units (between 15 – 80 sq m) bearing in mind one workstation is 10 sq m.

- Consideration should be given to the concept of shared “enterprise hubs” where individuals can take pay as you go workstations in shared spaces similar to touch down business centres similar to the “enterprise village” concept.

- I do not support the policy of a new extension of the research park more than the existing 14% already provided for within the park.

- The Surrey Research Park currently extends to 65,000 sq m.

- There is already granted consent to expand to a further 9,000 sq m (14%) This space has been available for 10 years and is still to find a taker.

- The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis.

- The ELNA 2015 calculated annual floor space demand is 0.7%.

- The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period.

- The necessary growth in floor space over the plan period is therefore 17 years x 0.7 = 12% which is less than the current expansion space of 14%.

Nature Conservation value of the site is protected or improved.

In relation to the Target there is no evidence of a justified need for additional B1a and c use. I consider that the existing land, used efficiently, will accommodate realistic expansion of B1b uses for high tech added value purposes. Existing planning permissions must be built before any additional green belt land is earmarked for development. The target of 35,000 sq metres of additional employment land are not justified by the evidence base.

I regard the evidence base (Employment Land Needs Assessment 2015) as flawed and inconsistent and therefore unreliable evidence.
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? ( )

We object to policy E4 Surrey research Park.

We support the maintenance of research, development and design activities, in any science, including social science, that is complimentary to the activities of the University of Surrey at the Surrey Research Park. However, we do not believe that there is a need to expand the Research Park into a larger Business Park. We believe that the planning policy going forward for the Surrey Research Park should be to maintain and enhance the integrity of its research base allowing for the economic value add to the local economy of knowledge and technology transfer from the University. We believe that B1b (should be the primary use class for the Research Park and that applications for B1a should be resisted due to the danger of dilution of the core purpose and reputation of the park. We do not believe the inclusion of B1c uses is appropriate or necessary.

- Research parks based on the early UK technology transfer exemplars of the Cambridge and Oxford need careful monitoring, nurturing and protection to ensure the integrity and quality of the park is maintained and the park continues to be a destination for innovation and enterprise
- There is a danger for research parks to be overwhelmed by short sighted development opportunities being taken by park managers provided by standard office activities and administrative functions which in time turn them into standard business parks which can be found anywhere in the country. Their relative low density and attractiveness make them targets for “any other” office user
- Research parks that lose their way stop being the location of choice for new innovative enterprises.
- The Surrey Research Park in Guildford needs to be focussed on a broad spectrum of scientific research including computer science, bio-chemistry, design, space-science, eco-science, health science, software development, laser technology, media-science, artificial intelligence, robotics and super-manufacturing
- Monitoring indicators should include new start-ups and new patents created
- Facilities should be provided whereby new small businesses can secure premises under subsidised licence fee arrangements with no onerous rent or lease commitments
- We support the idea of a variety of sizes of unit including some small units (between 15 – 80 sq m) bearing in mind one workstation is 10 sq m
- Consideration should be given to the concept of shared “enterprise hubs” where individuals can take pay as you go workstations in shared spaces similar to touch down business centres similar to the “enterprise village” concept
- We do not support the policy of a new extension of the research park more than the existing 14% already provided for within the park
- The Surrey Research Park currently extends to 65,000 sq m
- There is already granted consent to expand to a further 9,000 sq m (14%) This space has been available for 10 years and is still to find a taker
- The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis
- The ELNA 2015 calculated annual floor space demand is 0.7%
- The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period.
• The necessary growth in floor space over the plan period is therefore 17 years x 0.7 = 12% which is less than the current expansion space of 14%.

Nature Conservation value of the site is protected or improved.

In relation to the Target there is no evidence of a justified need for additional B1a and c use. We consider that the existing land, used efficiently, will accommodate realistic expansion of B1b uses for high tech added value purposes. Existing planning permissions must be built before any additional green belt land is earmarked for development. The target of 35 000 sq metres of additional employment land are not justified by the evidence base.

We regard the evidence base (Employment Land Needs Assessment 2015) as flawed and inconsistent and therefore unreliable evidence.

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

Attached documents:

Comment ID: PSLPP16/1077  Respondent: 8687265 / Dagero Ltd (David Roberts)  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E4  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

POLICY E4 - Surrey Research Park  
I OBJECT. The Council are required by the NPPF to facilitate commercial science and technology clusters. But, as with Policies H1 and E2 above, this policy seems to be dictated more by the ambitions of Surrey University than the public interest. In an extremely tangled sentence, it says that the Research Park will be “protected for business use… in any science… that is complementary to the activities of the University of Surrey.”

This fails to distinguish adequately between the University’s public role as a state-funded, academic institution and its private, financial interest in profit-making business spin-offs. It ignores enterprises that might be commercial rivals of the University. And it fails to consider the public harm done by turning the Research Park into a larger Business Park, such as the loss of Green Belt social and environmental capital.

B1b should be the primary use class for the Research Park and applications for B1a should be resisted given the danger of diluting the core purpose and reputation of the park. The inclusion of B1c uses is inappropriate and unnecessary.

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

Attached documents:

Comment ID: PSLPP16/2628  Respondent: 8693153 / Vicki Willetts  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E4  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT TO POLICY E4 (SURREY RESEARCH PARK): • Subordinates public planning policy to the University of Surrey’s private, commercial enterprises (not its public academic purpose). • No cost/benefit analysis of harm to Green Belt involved in extending research park. • Waters down research purpose of park, turning into a general business park.

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

Attached documents:

Comment ID: PSLPP16/4728  Respondent: 8711841 / Rosmarie Roberts-Kunz  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

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

I OBJECT TO POLICY E4 (SURREY RESEARCH PARK):

• Subordinates public planning policy to the University of Surrey’s private, commercial enterprises (not its public academic purpose).
• No cost/benefit analysis of harm to Green Belt involved in extending research park.
• Waters down research purpose of park, turning into a general business park.

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

Attached documents:

Comment ID: PSLPP16/9062  Respondent: 8723809 / Sally Blake  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

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

I object to POLICY E4 - Surrey Research Park

• Subordinates public planning policy to the University of Surrey’s private, commercial enterprises (not its public academic purpose).
• No cost/benefit analysis of harm to Green Belt involved in extending research park.
• Waters down research purpose of park, turning into a general business park.

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

Attached documents:

Comment ID: PSLPP16/9460  Respondent: 8728865 / Neville Bryan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

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

Object
I find this policy very strange, when there is none on other business parks or (and of much greater concern due to history) the University.

I do not support the policy of expanding the Research Park onto Blackwell Farm which is high quality Greenbelt and which has recently been identified as of sufficient quality to be included in the Surrey Hills AONB review (see the Land Management Services independent report commissioned by Worplesdon, Compton and Wanborough PC’s - June 2016)

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

Attached documents:

Comment ID: PSLPP16/16896  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 find this policy very strange to be included, when one on the University is not (and was removed from the 2003 plan in the 2007 review by the secretary of state. If inclusion of this type of policy is sound then we would expect the reintroduction of a policy on the university area of Manor Park (next door).

We do not support the policy of expanding the Research Park onto Blackwell Farm which is high quality Greenbelt and which has recently been identified as of sufficient quality to be included in the Surrey Hills AONB review (see the Land Management Services independent report commissioned by Worplesdon, Compton and Wanborough PC’s - June 2016)

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

Attached documents:

Comment ID: PSLPP16/2521  Respondent: 8729217 / Karen Stevens  Agent:

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

- Expansion of the Research Park onto green belt and the setting to the AONB requires exceptional circumstances, which have not been outlined in the plan. This policy does not therefore comply with planning law

- There is ample opportunity for the Research Park to grow without increasing its existing footprint - there is already capacity for the growth predicted in the ELNA and, if further growth were needed, it could build more densely by utilising space above its extensive surface car parks.

- Expansion of the Research Park at Blackwell Farm is not sound as there is no viable access to Blackwell Farm, and it would not be possible to provide such an access that was viable from an economic or highways point of view

- GBC has shown no Duty to cooperate in planning for an extension of the Research Park

- GBC has not explored in detail any joined-up approaches to providing employment land across the region, dismissing off-hand such ideas on the basis that “we don’t want Guildford to be a dormitory town”. [Stephen Mansbridge, April 1, 2014].
In particular GBC is ignoring Bordon Eco-town, a brownfield site outside the Green Belt, which is less than 30 minutes from Guildford by road, and is looking for high quality businesses to locate there. This is exactly the right area for expansion of some of Guildford’s businesses (particularly those on the Research Park).

There is also opportunity to develop rail links using existing lines and disused MOD lines.

In the Whitehill and Bordon Inward Investment Strategy 2012 Consultation Draft the masterplan recognises that “the town does not operate in isolation of its neighbouring business centres, such as Alton, Petersfield and Farnham and larger economic centres such as Portsmouth, Farnborough, Basingstoke and Guildford.”

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

Attached documents:

Comment ID: pslp171/2058  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 changes in policy E4 Surrey Research Park, ,which is earmarked for a 10-11 Ha expansion that is not supported by the findings of the ELNA 2017.

Neither is this expansion justified by the Research Park’s own growth, which has stagnated over the past 20 years, growing by just 14,000 sqm since 1996.

According the University of Surrey[8]:

“The original timescale for the development of the Surrey Research Park was 10 years. However, it has taken nearly 30 years to achieve 90% developed. Only sites for larger building still remain undeveloped after this period. The areas originally designated to micro and small companies was completed within the original planned 10 years. The slower rate of developments for larger companies reflects the fact that today many larger companies are not locating their R&D effort in a single large building but are looking to deploy their research activities as small specialist groups close to specific host organisations that have defined technology competencies.”

After 30 years, the Surrey Research Park still has capacity 6,769 sqm of R&D office space on its original 71,250 sqm site, and uptake on the Park has declined. This, together with Dr Parry’s statement that the demand is now for “small specialist groups close to host organisations” suggests that there is no need to extend the Research Park further. Small specialist groups can be located in the town centre, which is more sustainable in terms of traffic movements.

[Figure 6] – Cumulative gross built space on the Surrey Research Park since its inception (sq m) by year. Source The Surrey Research Park; A Case Study of Strategic Planning for Economic Development, Parry M, September 2012 Were it necessary for GBC to find 30,000 sqm of B1b office space, there are other options that do not require any intrusion into the green belt or onto land that forms the setting to an AONB. For example:

A. It would be possible to provide this on the existing low-density Surrey Research Park. The existing Research Park, (which provides 65,000 sq m2 of office space on 27 hectares of land) is developed at a plot ratio of 25%. This could be increased to 50% within the footprint of the existing park without any adverse impact. The University Estates Strategy shows that the University is planning to build up to 323,200 sqm across a smaller area of Manor Park (24.6 hectares) – this is six times the plot ratio of the Research Park, and still at the low end for a typical development in a major town such as Guildford. GBC’s approach shows a clear desire to maintain low-density development and to extend this low-density development onto neighbouring countryside.

[Figure 7] – Planned density of development on Manor Park
B. It would be possible (and more sustainable in terms of reduced traffic movements) to provide this 30,000 sqm of office space within the town centre, on sites that have currently been allocated for retail space. Much of this space is closer to the University of Surrey than Blackwell Farm.

There is no evidence that the retail space within the town centre needs to be expanded by 41,000 sqm at North Street. There is falling demand for retail space in Guildford and other town centres, due to the rise in online shopping (which jumped 16 per cent between January 2015 and January 2016).

The Centre for Retail Research Report[9] forecasts that by 2018:
• Total store numbers will fall by 22%
• The share of online retail sales will rise from 12.7% (2012) to 21.5% by 2018 or the end of the decade
• 41% of town centres will lose 27,638 stores in the next five years

There is no evidence to support GBC’s assumption that Guildford will buck these trends. Its ability to do so won’t be helped by increased congestion, resulting from proposals on Blackwell Farm.

C. A further option would be to expand the Surrey Research Park at Whitehill & Bordon, a former army barracks and brownfield site located 30 minutes south of Guildford by car. This new eco-town is seeking to attract exactly the sort of businesses that currently operate on the Surrey Research Park. The masterplan[10] for this ecotown recognises that:

“... the town does not operate in isolation of its neighbouring business centres, such as Alton, Petersfield and Farnham, and larger economic centres, such as Portsmouth, Farnborough, Basingstoke and Guildford. Links to these locations present opportunities to capture investment from important business sectors, such as defence, aerospace and communications, and higher education and research and from the Universities of Surrey, Portsmouth and Creative Arts at Farnham”

Duty to cooperate with Whitehill & Bordon clearly does suit the landowner and a local authority which wants to generate tax revenues within its own borough. There is a conflict of interest here, which means that GBC isn’t keen to promote this option. What is perceived by the Council to be good for them is bad in terms of planning, and bad for the environment.

Any arguments for expanding the Surrey Research Park by 30,000 sqm at its current location (sandwiched between the A31, A3 and A323) are untenable from a traffic point of view. The Surrey Research Park is in the wrong place and has contributed significantly to the traffic problems on the west of Guildford since its inception.

Problems with developing a business park at this location were identified in the 1980s at the time permission for the Research Park was first sought, and again when the University expanded onto what was then Manor Farm. The University and Hospital both objected to the nearby Tesco development in 1988 on the grounds of the traffic impact the superstore would have on their operations. Since then, the widening of Gill Avenue has provided some relief to traffic in this area, but congestion continues to be a chronic problem on the surrounding road network at morning and evening peak hours, with traffic backing up along local, residential roads and onto the A3. This problem would be further compounded by the addition of 35,000 sqm of offices, not to mention 1,800 residences and two schools proposed at the adjacent Blackwell Farm, and a new station at Park Barn.

I also object to the continued proposal to extend the Research Park to classes B1a and B1c (light industrial). This is both inappropriate and contrary to the original outline planning permission for the Research Park (as acknowledged in para 4.4.37 of the draft Plan). The land on which the Research Park sits was funded in part by Surrey County Council on behalf of the people of Surrey for educational purposes. It was not intended to become an industrial estate.

Low-density and surface car parks on the Surrey Research Park demonstrate wasteful use of space.

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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**Comment ID:** PSLPP16/2407  **Respondent:** 8729313 / Lisa Wright  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

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

**OBJECT.** Site should be included as AONB as per review provided by Worplesdon, Compton and Wanborough Parish Councils.

**OBJECT,** even if site hasnt got AONB designation, it affects the current Hogs Back AONB, adjacent AGLV and is wholly Greenbelt.

Currently, According to SRP website, 10,000sqft of built, unlet property on the Research Park.

SRP has in the last 3 weeks, started work on building one of the two remaining huge office buildings on the site. It has had planning for ages and coincidently thought it migt start building it now?

**OBJECT.** Building this site will destroy Ancient Woodland.

**OBJECT,** destruction of valuable arable Farmland.

**OBJECT,** site joins up Urban Guildford to Wood Street Village.

**OBJECT,** Road to site destroys border of old Deer Park and visable remains of the boundary.

**OBJECT,** Site increases traffic through Egerton Road Junction, a local gridlock area which is also the road to the A and E dept and Hospital. Trafic queues here for hours every day.

**OBJECT,** light pollution from the current Research Park means you cant see the stars at night. The Streelight lights are horrendously bright, especially in Winter.

**OBJECT,** Buildings on the Western edge of the current SRP are reflective silver and already impact on the views to and from the AONB in Winter.

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**Comment ID:** pslp171/1181  **Respondent:** 8729313 / Lisa Wright  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy E4

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

Object.
The University has plenty of space on the existing Surrey Research Park for expanding its buildings. The current site is full of surface car parking, huge empty plots, extensive greenery and landscaping.

The University markets this site as Low Density and should do very much more to EFFICIENTLY use its land before taking more of our countryside for development. They should invest in building out the huge empty plots, filling the empty offices and building over their car parks.

This proposed extension will also damage a very important Wildlife corridor, which is Ancient Woodland. It will also increase flooding in Wood Street, Fairlands, Park Barn and Guildford.

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

Attached documents: [IMG_1735.PNG (3.4 MB)]

Comment ID: PSLPP16/2362  Respondent: 8806305 / Laurence Cook  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

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

POLICY E4 - Surrey Research Park

I OBJECT. The Council are required by the NPPF to facilitate commercial science and technology clusters. But, as with Policies H1 and E2 above, this policy seems to be dictated more by the ambitions of Surrey University than the public interest. In an extremely tangled sentence, it says that the Research Park will be “protected for business use… in any science… that is complementary to the activities of the University of Surrey.”

This fails to distinguish adequately between the University’s public role as a state-funded, academic institution and its private, financial interest in profit-making business spin-offs. It ignores enterprises that might be commercial rivals of the University. And it fails to consider the public harm done by turning the Research Park into a larger Business Park, such as the loss of Green Belt social and environmental capital.

B1b should be the primary use class for the Research Park and applications for B1a should be resisted given the danger of diluting the core purpose and reputation of the park. The inclusion of B1c uses is inappropriate and unnecessary.

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

Attached documents:

Comment ID: PSLPP16/3715  Respondent: 8828417 / Valerie Wild  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

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

Policy E4 - Surrey Research Park

OBJECTION. This appears to allow the expansion of the Research Park into a more general Business Park. It should certainly not be allowed to take up Green Belt. It has already had a very detrimental impact on the views towards Guildford from the A31 Hogs Back route.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to this proposal. Extension of the Research Park in to Blackwell Farm is wholly inappropriate in the greenbelt.

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

The Surrey Research needs to be focussed on a broad spectrum of scientific research including computer science, biochemistry, design, space-science, eco-science, health science, software development, laser technology, media-science, artificial intelligence, robotics and super-manufacturing

We do not believe that there is a need to expand the Research Park into a larger Business Park. We believe that the planning policy going forward for the Surrey Research Park should be to maintain and enhance the integrity of its research base allowing for the economic value add to the local economy of knowledge and technology transfer from the University.

Class B1b should be the primary use class for the Research Park and applications for B1a should be resisted due to the danger of dilution of the core purpose and reputation of the Park. We do not believe the inclusion of B1c uses is appropriate or necessary.

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

Key parts of the evidence are still missing, flawed or based on withheld assumptions. The Strategic Housing Market Assessment overstates need, the Green Belt and Countryside Study uses a flawed approach, and the Transport Assessment is too late and incomplete to be relied upon to inform the Plan.

The Plan excludes the Town Centre Master Plan, which plays a pivotal role and fails to address the results of infrastructure difficulties, or use these and Greenbelt to constrain the level of development.
This document omits many important points that are to be addressed at a future stage. The information is, however, very relevant and necessary and without it the document is weak on evidence. The overview given does not assess the capacity of existing supply to accommodate future growth. The paper acknowledges that almost 9% of commercial premises are empty and this somewhat flies in the face of arguments to vastly increase the volume until the reasons are understood. Around 30% of businesses are considering leaving Guildford (congestion being cited as a reason). There are also issues with planning permissions being granted to convert office space to residential, whilst at the same time it is argued that more offices are needed? The contradictions appear to indicate that policies related to this need firming up and that the evidence is incomplete.

I disagree with 40% of land in the town centre being given over to retail as there is no evidence that Guildford will 'buck the national trend' in terms of declining high-street sales, as has been suggested by Cllr Furniss. Guildford urban area ranks no 1 in terms of being the most sustainable location in the borough and, as housing is a priority, there should be more than 1,172 residences in the town centre.

I object to Policy E4 (expansion of the Surrey Research Park into the Blackwell Farm) The existing Research Park has been built at a very low density (25% plot ratio), which is very low for an urban extension. The majority of existing buildings are 2 storeys giving a developed floor space plot ratio of only 12.5%.

The existing Research Park has acres of surface car parking, which provides it with the opportunity to markedly increase its density without infringing any Green Belt land nearby. Any density increase would be cost effective for the use of all existing infrastructure and would also have the potential to match the existing density of the neighbouring academic buildings on the university campus at Manor Park, which is five times higher.

Together with the existing expansion of 14% through existing consents and the opportunity to increase its density, the Research Park has ample capacity to expand to embrace new demand for B1b uses linked to the university, without utilising additional land.

The strategic highway assessment requires a great deal more work and hence I OBJECT to the inclusion of this as evidence.

The B3000 runs through Compton, a small village with many listed buildings, most of which are very close to the road. The road already carries in excess of 5 million vehicles a year with average flow rates exceeding most A roads. It is the only settlement area in the borough where pollution levels exceed EU regulations and it is close to capacity now, with tailbacks at peak times, which add to the pollution problem. [see legal section]

The study is highly misleading. It refers to a figure of zero additional traffic from scenario 3, which includes the traffic from the strategic sites, one of which is partly in Compton. The assessment does not make it clear that the modelling is extremely limited and only includes impact on developments within the immediate area. Blackwell Farm is excluded from Area 107 (part of Compton) as false boundaries have been set. I believe that the impact from the strategic sites will be far-reaching and will most certainly impact Compton and beyond. Each village needs to be able to see the impact that development will have. The Highways Assessment concentrates on peak time traffic only and gives no indication of overall volume increases or traffic type using specific routes outside peak hours. Understanding of the overall increase is important, as there is a bridge on the B3000 between Artington and Compton, which has a width restriction and may also require a weight restriction as it needs replacing within the next 2 years and no funding has been set aside for this. Instead Network Rail, SCC, GBC and Waverley BC continue to battle over responsibility for, and scope of, the project.

It appears that traffic data has been collected at different times of the year and over varying time scales in order to provide averages. This method of data collection can underestimate measurements by at least 30%.

Furthermore, I have been told that the person responsible for ratifying traffic data at Surrey County Council (SCC) has been off sick for over a year and that, whilst the daily data boxes continue to collect data, that data has not been collected or analysed for 2015. The data put forward for Compton's B3000 was based on a 3-week period in January and, as this was not representative, we understand it was removed. That said, the year-on-year data is for different periods and different times, varying from a few weeks in winter to longer periods over many months. I would like a more robust approach to traffic data collation. Indeed it does not correspond to the statistics generated by the Vehicle Activated Signals which have been monitoring traffic speeds through Compton for a number of years.
The cumulative effect of the additional traffic generated by the developments in the proposed submission Local Plan will be to increase congestion, even with the proposed highway improvement schemes in place. More detailed analysis of the junctions and queuing is required. We question the conclusion that the developments would have an acceptable impact on the capacity of the highway networks in terms of the policy test set in paragraph 32 of NPPF. We do not believe that the impact on the B3000 will be acceptable, as it is already operating beyond capacity, and this situation will be made much worse following the mitigation proposed for the A3.

The Highways Assessment is limited to 30 results. Roads have been omitted from the report and it is unclear whether findings for the B3000 (also referred to as The Street B3000) are in fact from the Street or the roundabout from which there is a feeder road to Godalming via Priorsfield Road.

The table comparing scenarios and the impact on traffic is difficult to decipher. Scenario 1 includes current planning permissions plus Waverley’s strategic sites. This shows an increase of just 9 vehicles per hour at peak times on the B3000. The next scenario 2 is the same, but includes GBC’s strategic sites. Given that there is a strategic site in Compton of 1,800 homes and another of 1,000 at Normandy, the expectation would be for the volume to be not only higher, but considerably higher. The result is however, ZERO. We understand that this is because the impact measured is only from the immediate area and, as Blackwell Farm has been removed from the village for modelling terms, this does not give a realistic result. The omission of the Town Centre Master Plan and its impact on the roads further diminishes the integrity of this Highways Assessment.

Even without the full impact being understood, it is clear from the scale of development on the west of Guildford (1,800 homes at Blackwell Farm, 1,000 homes at Normandy, 1,300 homes at Ash, 3,800 homes in the Aldershot urban area, 1,200 homes at Borden) that the increase in traffic on the B3000 and other main routes would be severe.

The Highways Assessment shows that as a result of the proposals put forward in this draft of the Local Plan the B3000 will suffer the highest increase in flow rates at peak times (after the M25, A320 and A25. It also reveals that traffic flows would increase if the A3 was widened, as the A3 would then attract more traffic via the B3000. Despite this, there are no solutions planned to mitigate the situation and we are therefore strongly objecting to the level of development and in particular strategic development at Blackwell Farm as outlined in the Local Plan.

The proposal to introduce a new route to Guildford town centre from the west via Blackwell Farm has been ill-thought out. The volume of traffic that will use this new ‘rat run’ through the new development and the university campus/business park, has been underestimated. There will be problems for traffic wishing to exit the new development in both directions during peak hours - traffic is frequently queuing for miles along the A31, and the Tesco roundabout is one of the worst bottlenecks in Guildford. The knock-on effect on the Egerton Road/Gill Avenue junction would impede emergency vehicles getting to and from the hospital.

The 4-way junction on the A31 has no detail at all and the concern is that permission in principle will be given to the site in the hope that these problems are surmountable. If they are insurmountable, which I believe they are, then enormous amounts of Green Belt land within the setting of the Surrey Hills AONB will have been sacrificed for nothing. The 4-way junction, if it goes ahead, is likely to be huge and, due to its elevated position, will cause significant harm to the AONB in terms of landscape and light pollution.

The Highways Assessment has many limitations, not least being the absence of the Town Centre Master Plan, which includes potential road closure and re-routing. Compton is likely to be very much affected by any reduction in road capacity in the town centre and it is important that we are presented with the whole picture.

The Assessment acknowledges that not all impacts of proposed Blackwell Farm development have been modelled and that, due to the emphasis on the A31 and the A3, not all roads were included.

The report concludes that the improvements to the A3 are necessary to maintain adequate flow rates on the strategic network. Further work is needed to determine what impact any widening or junction improvements will have on local roads, and what will be done to mitigate against the increased flows through Compton, particularly given that a section of the B3000 though the Village is anticipated to become an Air Quality Management Area. GBC has resisted requests by members of the PC to have the northern end of The Street made an AQMA, but readings of nitrous oxide in this area are well above EU legal limits.
There is little information about the tunnel but the map indicates that one access / egress point will be in Compton near the A3, although no land has been safeguarded for this purpose. This is likely to have the same impact as the improvements to the A3, i.e. increased traffic (and pollution) through Compton.

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 SHMA method should be changed to consider student housing need separately due to the distorting effects of students on the figures.

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.

Two additional reviews of the SHMA reach similar conclusions, one having been produced by CPRE and the other by Cllr. David Reeve.

The exclusion of sites of 5 dwellings or fewer from the list might make administration easier, but the addition of these sites plus windfalls and outstanding (but current) permissions gives rise to a higher number of dwellings than is actually needed. There is therefore no justification for release of all the Green Belt put forward.

The criteria used to include or exclude sites because of this study lack consistency, with many sites excluded as ‘unsuitable’ with no further explanation offered (many of which were in the urban area of Ash). The assessment lacks objectivity and detail.

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

Attached documents:

Comment ID: PSLPP16/16223  Respondent: 8839041 / Jon Maslin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

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

I object to policy E4 Surrey Research Park.

I support the maintenance of research, development and design activities, in any science, including social science, that is complementary to the activities of the University of Surrey at the Surrey Research Park. I object however to the completely unnecessary expansion of the Research Park into a larger Business Park. I believe that the planning policy going forward for the Surrey Research Park should be to maintain and enhance the integrity of its research base allowing for the economic value add to the local economy of knowledge and technology transfer from the University.

I believe that B1b (should be the primary use class for the Research Park and that applications for B1a should be resisted due to the danger of dilution of the core purpose and reputation of the park. I object to the inclusion of B1c uses which is inappropriate and unnecessary.

Research parks based on the early UK technology transfer exemplars of the Cambridge and Oxford need careful monitoring, nurturing and protection to ensure the integrity and quality of the park is maintained and the park continues to be a destination for innovation and enterprise.
There is a danger for research parks to be overwhelmed by short sighted development opportunities being taken by park managers provided by standard office activities and administrative functions which in time turn them into standard business parks which can be found anywhere in the country. Their relative low density and attractiveness make them targets for ‘any other’ office user.

Research parks that lose their way stop being the location of choice for new innovative enterprises.

I hope the Surrey Research Park in Guildford remains focussed on a broad spectrum of scientific research including computer science, bio-chemistry, design, space-science, eco-science, health science, software development, laser technology, media-science, artificial intelligence, robotics and super-manufacturing

Monitoring indicators should include new start-ups and new patents created.

Facilities should be provided whereby new small businesses can secure premises under subsidised licence fee arrangements with no onerous rent or lease commitments.

I support the idea of a variety of sizes of unit including some small units (between 15 – 80 sq m) bearing in mind one workstation is 10 sq m.

Consideration should be given to the concept of shared ‘enterprise hubs’ where individuals can take pay as you go workstations in shared spaces similar to touch down business centres similar to the ‘enterprise village' concept.

I object to the policy of any new extension of the research park more than the existing 14% already provided for within the park or within the footprint of the park.

The Surrey Research Park currently extends to 65,000 sq m.

There is already granted consent to expand to a further 9,000 sq m (14%) This space has been available for 10 years and is still to find a taker.

The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis.

The ELNA 2015 calculated annual floor space demand is 0.7%.

The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period.

The necessary growth in floor space over the plan period is therefore 17 years x 0.7 = 12% which is less than the current expansion space of 14%.

The research park is developed at a plot ratio of 25%. This could be increased to 50% within the same footprint of the existing park without damage to its amenity. The actual current land use for development in the park is in fact only 12.5% because most buildings are 2-storey.

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

Attached documents:
The density of development on the existing research park (glorified business park) would enable expansion for the next 25 years without spreading onto adjacent greenbelt land and dissecting the ancient woodland. Our MP Anne Milton has made this point very strongly to the University.

The University have acres of surface car parking which could be located below ground and office and accommodation could be provided above.

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

**Attached documents:**

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**Comment ID:** PSLPP16/17781  **Respondent:** 8858113 / Ramsey Nagaty  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**I object** to policy E4 Surrey research Park.

I fully support the maintenance of research, development and design activities, in any science, including social science, that is complementary to the activities of the University of Surrey at the Surrey Research Park or other local sites. However, we do not believe that there is a need to expand the Research Park into a larger Business Park. I believe that the planning policy going forward for the Surrey Research Park should be to maintain and enhance the integrity of its research base allowing for the economic value add to the local economy of knowledge and technology transfer from the University. I believe that B1b (should be the primary use class for the Research Park and that applications for B1a should be resisted due to the danger of dilution of the core purpose and reputation of the park. I do not believe the inclusion of B1c uses is appropriate or necessary. I note that not all businesses on the Research Park are research or high tech businesses nor do they necessarily have any connection with the University other than paying rent to them.

- Research parks based on the early UK technology transfer exemplars of the Cambridge and Oxford need careful monitoring, nurturing and protection to ensure the integrity and quality of the park is maintained and the park continues to be a destination for innovation and enterprise
- There is a danger for research parks to be overwhelmed by short sighted development opportunities being taken by park managers provided by standard office activities and administrative functions which in time turn them into standard business parks which can be found anywhere in the country. Their relative low density and attractiveness make them targets for “any other” office user
- Research parks that lose their way stop being the location of choice for new innovative enterprises.
- The Surrey Research Park in Guildford needs to be focussed on a broad spectrum of scientific research including computer science, bio-chemistry, design, space-science, eco-science, health science, software development, laser technology, media-science, artificial intelligence, robotics and super-manufacturing
- Monitoring indicators should include new start-ups and new patents created
- Facilities should be provided whereby new small businesses can secure premises under subsidised licence fee arrangements with no onerous rent or lease commitments
- I support the idea of a variety of sizes of unit including some small units (between 15 – 80 sq m) bearing in mind one workstation is 10 sq m
- Consideration should be given to the concept of shared “enterprise hubs” where individuals can take pay as you go workstations in shared spaces similar to touch down business centres similar to the “enterprise village” concept
- I do not support the policy of a new extension of the research park more than the existing 14% already provided for within the park
- The Surrey Research Park currently extends to 65,000 sq m
• There is already granted consent to expand to a further 9,000 sq m (14%) This space has been available for 10 years and is still to find a taker
• The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis
• The ELNA 2015 calculated annual floor space demand is 0.7%
• The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period.
• The necessary growth in floor space over the plan period is therefore 17 years x 0.7 = 12% which is less than the current expansion space of 14%.

Nature Conservation value of the site is protected or improved.

In relation to the Target there is no evidence of a justified need for additional B1a and C use. We consider that the existing land, used efficiently, will accommodate realistic expansion of B1b uses for high tech added value purposes. Existing planning permissions must be built before any additional green belt land is earmarked for development. The target of 35 000 sq metres of additional employment land are not justified by the evidence base.

I regard the evidence base (Employment Land Needs Assessment 2015) as flawed and inconsistent and therefore unreliable evidence.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2654  Respondent: 8858113 / Ramsey Nagaty  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

15 POLICY E4: SURREY RESEARCH PARK
15.1 I object to changes in policy E4 Surrey Research Park which is still earmarked for excessive expansion which is not supported by the findings of the Employment Land Needs Assessment 2017

15.2 I support the maintenance of research, development and design activities, in any science, including social science, that is complementary to the activities of the University of Surrey at the Surrey Research Park. I object however to the completely unnecessary expansion of the Research Park into a larger Business Park.

15.3 I object to the extension to the Research Park of over 10 hectares which the Local Plan proposes to deliver. This I understand will provide a total capacity of around 35,000 sq m of additional floorspace, of which 30,000 sq m is expected to be delivered in the plan period. This expansion is not effectively supported by evidence for an increase in B1b use class under the Employment Land Needs Assessment 2017.

15.4 I also believe that B1b (should be the primary use class for the Research Park and that applications for B1a should be resisted due to the danger of dilution of the core purpose and reputation of the park. I also object to the inclusion of B1c light industrial uses which is inappropriate and unnecessary.

15.5 Research parks based on the early UK technology transfer exemplars of the Cambridge and Oxford need careful monitoring, nurturing and protection to ensure the integrity and quality of the park is maintained and the park continues to be a destination for innovation and enterprise

15.6 There is a danger for research parks to be overwhelmed by short sighted development opportunities being taken by park managers provided by standard office activities and administrative functions which in time turn them into standard business parks which can be found anywhere in the country. Their relative low density and attractiveness make them
targets for “any other” office user. The University from my personal experience is open to any type of business not specifically research or science or without any connection to the University.

15.7 Research parks that lose their way stop being the location of choice for new innovative enterprises. Existing tenants have expressed views in favour of non-development of the site into further land which will be surrounded by housing cutting it off from access to the countryside – I refer specifically to conversations I have had with Peter Molyneaux.

15.8 The Surrey Research Park in Guildford needs to be focussed on a broad spectrum of scientific research including computer science, bio-chemistry, design, space-science, eco-science, health science, software development, laser technology, media-science, artificial intelligence, robotics and super-manufacturing.

15.9 Monitoring indicators should include new start-ups and new patents created.

15.10 Facilities should be provided whereby new small businesses can secure premises under subsidised licence fee arrangements with no onerous rent or lease commitments.

15.11 The Surrey Research Park currently extends to 65,000 sq m.

15.12 The research park is developed at a plot ratio of 25%. This could be increased to 50% within the same footprint of the existing park without damage to its amenity. The actual current land use for development in the park is in fact only 12.5% because most buildings are 2-storey. There is also excessive overland car parking.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Policy E4 - Surrey Research Park

I object. By protecting the University for business use and expanding the Research Park it is to the detriment of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I support the maintenance of research, development and design activities, in any science, including social science, that is complementary to the activities of the University of Surrey at the Surrey Research Park. I do not believe that there is a need to expand the Research Park into a larger Business Park. I believe that the planning policy going forward for the Surrey Research Park should be to maintain and enhance the integrity of its research base allowing for the economic value add to the local economy of knowledge and technology transfer from the University. I believe that B1b should be
the primary use class for the Research Park and that applications for B1a should be resisted due to the danger of dilution of the core purpose and reputation of the park. I do not believe the inclusion of B1c uses is appropriate or necessary.

- Research parks based on the early UK technology transfer exemplars of the Cambridge and Oxford need careful monitoring, nurturing and protection to ensure the integrity and quality of the park is maintained and the park continues to be a destination for innovation and enterprise

- There is a danger for research parks to be overwhelmed by short sighted development opportunities being taken by park managers provided by standard office activities and administrative functions which in time turn them into standard business parks which can be found anywhere in the country. Their relative low density and attractiveness make them targets for “any other” office user

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- I support the idea of a variety of sizes of unit including some small units (between 15 – 80 sq m) bearing in mind one workstation is 10 sq m

- Consideration should be given to the concept of shared “enterprise hubs” where individuals can take pay as you go workstations in shared spaces similar to touch down business centres similar to the “enterprise village” concept

- I do not support the policy of a new extension of the research park more than the existing 14% already provided for within the park

- The Surrey Research Park currently extends to 65,000 sq m

- There is already granted consent to expand to a further 9,000 sq m (14%) This space has been available for 10 years and is still to find a taker

- The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis

- The ELNA 2015 calculated annual floor space demand is 0.7%

- The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period.

- The necessary growth in floor space over the plan period is therefore 17 years x 0.7 = 12% which is less than the current expansion space of 14%.

Nature Conservation value of the site is protected or improved.

In relation to the Target there is no evidence of a justified need for additional B1a and c use. I consider that the existing land, used efficiently, will accommodate realistic expansion of B1b uses for high tech added value purposes. Existing planning permissions must be built before any additional green belt land is earmarked for development. The target of 35 000 sq metres of additional employment land are not justified by the evidence base.
I regard the evidence base (Employment Land Needs Assessment 2015) as flawed and inconsistent and therefore unreliable evidence.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1127  Respondent: 8860897 / Julia Shaw  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

1. I object to changes in policy E4 Surrey Research Park which is still earmarked for excessive expansion which is not supported by the findings of the Employment Land Needs Assessment 2017
2. I support the maintenance of research, development and design activities, in any science, including social science, that is complementary to the activities of the University of Surrey at the Surrey Research Park. I object however to the completely unnecessary expansion of the Research Park into a larger Business Park.
3. I object to the extension to the Research Park of over 10 hectares will be delivered. This I understand will provide a total capacity of around 35,000 sq m of additional floorspace, of which 30,000 sq m is expected to be delivered in the plan period. This expansion is not effectively supported by evidence for an increase in B1b use class under the Employment Land Needs Assessment 2017.
4. I also believe that B1b (should be the primary use class for the Research Park and that applications for B1a should be resisted due to the danger of dilution of the core purpose and reputation of the park. I also object to the inclusion of B1c light industrial uses which is inappropriate and unnecessary.
5. Research parks based on the early UK technology transfer exemplars of the Cambridge and Oxford need careful monitoring, nurturing and protection to ensure the integrity and quality of the park is maintained and the park continues to be a destination for innovation and enterprise.
6. There is a danger for research parks to be overwhelmed by short sighted development opportunities being taken by park managers provided by standard office activities and administrative functions which in time turn them into standard business parks which can be found anywhere in the country. Their relative low density and attractiveness make them targets for “any other” office user.
7. Research parks that lose their way stop being the location of choice for new innovative enterprises.
8. The Surrey Research Park in Guildford needs to be focussed on a broad spectrum of scientific research including computer science, bio-chemistry, design, space-science, eco-science, health science, software development, laser technology, media-science, artificial intelligence, robotics and super-manufacturing.
9. Monitoring indicators should include new start-ups and new patents created.
10. Facilities should be provided whereby new small businesses can secure premises under subsidised licence fee arrangements with no onerous rent or lease commitments.
11. The Surrey Research Park currently extends to 65,000 sq m.
12. The research park is developed at a plot ratio of 25%. This could be increased to 50% within the same footprint of the existing park without damage to its amenity. The actual current land use for development in the park is in fact only 12.5% because most buildings are 2-storey.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16973  Respondent: 8893057 / Dianne Garnett  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

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 E4 Surrey research Park.

1.2 We support the maintenance of research, development and design activities, in any science, including social science, that is complementary to the activities of the University of Surrey at the Surrey Research Park. I object however to the completely unnecessary expansion of the Research Park into a larger Business Park. I believe that the planning policy going forward for the Surrey Research Park should be to maintain and enhance the integrity of its research base allowing for the economic value add to the local economy of knowledge and technology transfer from the University.

1.3 We believe that B1b (should be the primary use class for the Research Park and that applications for B1a should be resisted due to the danger of dilution of the core purpose and reputation of the park. I object to the inclusion of B1c uses which is inappropriate and unnecessary.

1.4 Research parks based on the early UK technology transfer exemplars of the Cambridge and Oxford need careful monitoring, nurturing and protection to ensure the integrity and quality of the park is maintained and the park continues to be a destination for innovation and enterprise.

1.5 There is a danger for research parks to be overwhelmed by short sighted development opportunities being taken by park managers provided by standard office activities and administrative functions which in time turn them into standard business parks which can be found anywhere in the country. Their relative low density and attractiveness make them targets for “any other” office user.

1.6 Research parks that lose their way stop being the location of choice for new innovative enterprises.

1.7 The Surrey Research Park in Guildford needs to be focussed on a broad spectrum of scientific research including computer science, bio-chemistry, design, space-science, eco-science, health science, software development, laser technology, media-science, artificial intelligence, robotics and super-manufacturing.

1.8 Monitoring indicators should include new start-ups and new patents created.

1.9 Facilities should be provided whereby new small businesses can secure premises under subsidised licence fee arrangements with no onerous rent or lease commitments.

1.10 We support the idea of a variety of sizes of unit including some small units (between 15 – 80 sq m) bearing in mind one workstation is 10 sq m.

1.11 Consideration should be given to the concept of shared “enterprise hubs” where individuals can take pay as you go workstations in shared spaces similar to touch down business centres similar to the “enterprise village” concept.

1.12 We object to the policy of any new extension of the research park more than the existing 14% already provided for within the park or within the footprint of the park.

1.13 The Surrey Research Park currently extends to 65,000 sq m.

1.14 There is already granted consent to expand to a further 9,000 sq m (14%) This space has been available for 10 years and is still to find a taker.

1.15 The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis.

1.16 The ELNA 2015 calculated annual floor space demand is 0.7%.

1.17 The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period.

1.18 The necessary growth in floor space over the plan period is therefore 17 years x 0.7 = 12% which is less than the current expansion space of 14%.
1.19 The research park is developed at a plot ratio of 25%. This could be increased to 50% within the same footprint of the existing park without damage to its amenity. The actual current land use for development in the park is in fact only 12.5% because most buildings are 2-storey.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/18570  Respondent: 8896161 / Carol Wilson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

E4 B1b should be the primary use for the business park. I object to B1a being there.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1028  Respondent: 8896161 / Carol Wilson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Research Park. I object to changing the type of business on this site. It currently commands high respect as a centre of excellence in science based activities. it should not be diluted by general office use.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8156  Respondent: 8902465 / Linda Slater  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY E4 (SURREY RESEARCH PARK):

- Subordinates public planning policy to the University of Surrey’s private, commercial enterprises (not its public academic purpose).
- No cost/benefit analysis of harm to Green Belt involved in extending research park.
- Waters down research purpose of park, turning into a general business park.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy E4 - Surrey Research Park

I support the Research Park and its specialism, but I object to the current need to expand. The land hungry current ground level car parking for Research Park should be utilised for shared multi-storey or underground parking and the freed-up car parks used for the Park development. All new Research Park development should include underground car parking, as in other countries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy E1: Meeting employment needs

No comment. This should not be taken to imply support for this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16162  Respondent: 8948385 / Gillian Eve  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

No comment. This should not be taken to imply support for this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17304  Respondent: 8967233 / University of Surrey (University of Surrey)  Agent: Terence O'Rourke (Luke Vallins)
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The University is very pleased to see the value that the Council attributes to the Surrey Research Park, as outlined in its decision to introduce a policy that specifically covers the Research Park.

As explained earlier, the presence of the University and the Surrey Research Park have helped to diversify the region’s economic base by adding technology jobs to the public, retail and service sector employment in the region. The University and its Research Park have mitigated impacts on Guildford with investment in public transport, with onsite accommodation for students and by together putting about £1.7 billion into the UK economy every year. This includes about £950 million in Guildford borough.

The University is supportive of this policy as well as the proposed extension to the Surrey Research Park, which will enable the Research Park to grow and to continue to deliver a range of benefits to the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1437  Respondent: 9009185 / Diana Elliott  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
It also proposes more office space to an extended business park [policyE4] which will increase peak time congestion, particularly around the hospital and A&E, and will encourage rat-running through residential areas. This proposal also ignores independent traffic studies, which show the impact of the Blackwell Farm development on the local network, and question the viability of the scheme[2.14a]. This proposed development will add to air pollution in neighbouring areas, which already exceeds safe EU limits for nitrous oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11449  Respondent: 9062913 / Susan Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY E4 Surrey Research Park

OBJECT I support the maintenance of research, development and design activities, in any science, including social science, that is complementary to the activities of the University of Surrey at the Surrey Research Park. I do not believe that there is a need to expand the Research Park into a larger Business Park. I believe that the planning policy going forward for the Surrey Research Park should be to maintain and enhance the integrity of its research base allowing for the economic value add to the local economy of knowledge and technology transfer from the University. I believe that B1b (should be the primary use class for the Research Park and that applications for B1a should be resisted due to the danger of dilution of the core purpose and reputation of the park. I do not believe the inclusion of B1c uses is appropriate or necessary.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1864  Respondent: 9062913 / Susan Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY E4: SURREY RESEARCH PARK

I object to changes in policy E4 Surrey Research Park which is still earmarked for excessive expansion which is not supported by the findings of the Employment Land Needs Assessment 2017.

I support the maintenance of research, development and design activities, in any science, including social science, that is complementary to the activities of the University of Surrey at the Surrey Research Park. We object however to the completely unnecessary expansion of the Research Park into a larger Business Park.

I object to the extension to the Research Park of over 10 hectares will be delivered. This I understand will provide a total capacity of around 35,000 sq m of additional floorspace, of which 30,000 sq m is expected to be delivered in the plan period. This expansion is not effectively supported by evidence for an increase in B1b use class under the Employment Land Needs Assessment 2017.
I also believe that B1b (should be the primary use class for the Research Park and that applications for B1a should be resisted due to the danger of dilution of the core purpose and reputation of the park. We also object to the inclusion of B1c light industrial uses which is inappropriate and unnecessary.

Research parks based on the early UK technology transfer exemplars of the Cambridge and Oxford need careful monitoring, nurturing and protection to ensure the integrity and quality of the park is maintained and the park continues to be a destination for innovation and enterprise.

There is a danger for research parks to be overwhelmed by short sighted development opportunities being taken by park managers provided by standard office activities and administrative functions which in time turn them into standard business parks which can be found anywhere in the country. Their relative low density and attractiveness make them targets for “any other” office user.

Research parks that lose their way stop being the location of choice for new innovative enterprises.

The Surrey Research Park in Guildford needs to be focussed on a broad spectrum of scientific research including computer science, bio-chemistry, design, space-science, eco-science, health science, software development, laser technology, media-science, artificial intelligence, robotics and super-manufacturing.

Monitoring indicators should include new start-ups and new patents created.

Facilities should be provided whereby new small businesses can secure premises under subsidised licence fee arrangements with no onerous rent or lease commitments.

The Surrey Research Park currently extends to 65,000 sq m.

The research park is developed at a plot ratio of 25%. This could be increased to 50% within the same footprint of the existing park without damage to its amenity. The actual current land use for development in the park is in fact only 12.5% because most buildings are 2-storey.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT. I support the maintenance of research, development and design activities, in any science, including social science, which is complementary to the activities of the University of Surrey at the Surrey Research Park. I do not, however, believe that there is a need to expand the Research Park into a larger Business Park. I believe that the planning policy going forward for the Surrey Research Park should be to maintain and enhance the integrity of its research base allowing for the economic value add to the local economy of knowledge and technology transfer from the University. I believe that B1b should be the primary use class for the Research Park and that applications for B1a should be resisted due to the danger of dilution of the core purpose and reputation of the park. I do not believe the inclusion of B1c uses is appropriate or necessary.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
In 2016 Enterprise M3 LEP commissioned Regeneris to undertake a review of their 2013 Commercial Property Market Study. The final report is due to be considered at Enterprise M3’s Board Meeting in July 2016. Information relating to this is not yet in the public domain but for the purposes of this consultation has been referenced to help support our response. In light of this, Enterprise M3 requests that this response is only made public once the Commercial Property Market Study has been published.

The Enterprise M3 Commercial Property Market Study, 2016 highlights that Guildford is a highly sought after office location. Its highly skilled labour, market and transport connections to London mean that office development attracts some of the highest rental values in the LEP area and that speculative office development is therefore commercially viable. Future developments, such as the planned expansion of the University of Surrey will further enhance the appeal of Guildford as a location for inward investment.

The Commercial Property Market Study, 2016 highlights that the challenge facing Guildford is that it has a major shortage of office space within the town centre and a very limited pipeline of sites. The few vacant sites in the town centre are also under growing pressure to be converted to residential uses. It therefore follows that Enterprise M3 is therefore very supportive of employment allocations for quality, grade A office space within Guildford town centre which meets this demand.

Although within the Proposed Submission Local Plan we have noted that there are a limited number of allocations for employment development within the town centre, Enterprise M3 is supportive of the Draft Guildford Town Centre Masterplan, 2015 and look forward to seeing the proposals and working with Guildford Borough Council to bring it forward. In particular, the ability of the Bedford Wharf area to provide much needed employment space within the town centre would be very much welcomed.

Nevertheless, given the recognised shortage of office space within the town centre we encourage further consideration to be given to ensuring that there is sufficient land allocated for quality office development within the town centre in order to prevent the loss of existing and new major users in the future finding no suitable land in Guildford and subsequently locating elsewhere to the economic detriment of the wider Enterprise M3 area.

Enterprise M3 is very supportive of policy E4, which makes provision for a 10 ha extension to Surrey Research Park. This is one of the Borough’s largest employment areas and a centre of excellence in technology, science health and engineering. This extension is expected to provide up to 35,000 sq m of additional office and R&D floor space, which added to the remaining 9,000 sq m provides a significant amount of employment space for research, development and design activities that are complimentary to those activities undertaken at the University of Surrey. This extension will ensure the continued growth and success of the Research Park and the businesses within it, which aligns strongly within our ambitions for innovation and enterprise across the Enterprise M3 LEP area, particularly around the development of 5G technology for which the University of Surrey is playing a key part.

The Commercial Property Market Study, 2016 also highlights that demand for industrial sites in Guildford has been strong, evidenced by the take up and development at Henley Business Park. Since 2013 the business park has achieved one pre-let and is also speculatively building out two units, with only 6,000 sq m of development space remaining.

However, the Commercial Property Market Study, 2016 recognises that there remains persistent shortage of both available industrial space and land with development potential in most market areas within the LEP. This includes light industrial space which is suitable for SMEs, but particularly for large scale warehousing which could attract new investment to the LEP area in light of recent upwards trends in e-commerce. This undersupply of B8 space transcends LEP boundaries, with very strong demand evident for any sites that can serve the London market. We would therefore encourage further consideration to be given in planning for storage & distribution employment space to meet the needs of the warehousing/logistics sector in the South East, a region which has been recognised as experiencing a particular shortage.
Policy E1 makes reference to the need to plan for between 4.7ha and 5.3ha of industrial land (B1c, B2, and B8 uses) within Guildford during the plan period 2013 - 2033. From looking through the Site Allocations section of the Proposed Submission Local Plan, the majority of this requirement for industrial land can be met through the development of the Slyfield Regeneration Area (Allocation A24), a 40 ha site allocated for light industrial uses as well as 1,000 homes, 4 traveller pitches, a new waste management depot and sewage treatment works and community facilities. A further 7,000 sq m of land for industrial and storage & distribution uses can also be accommodated at Garlick’s Arch, Send Marsh/ Burnt Common and Ripley (Allocation A43) and as aforementioned, 6,000 sq m of development space for storage & distribution uses also remains at Henley Business Park. This indicates that there is enough supply to meet the requirements for industrial development as set out in Guildford’s Employment Lands Needs Assessment, 2015 and we are supportive of this approach.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8225  Respondent: 10662849 / Garry Walton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY E4 - Surrey Research Park

I OBJECT. The Council are required by the NPPF to facilitate commercial science and technology clusters. But, as with Policies H1 and E2 above, this policy seems to be dictated more by the ambitions of the University of Surrey than the public interest. In an extremely tangled sentence, it says that the Research Park will be “protected for business use… in any science… that is complementary to the activities of the University of Surrey.”

This fails to distinguish adequately between the University’s public role as a state-funded, academic institution and its private, financial interest in profit-making business spin-offs. It ignores enterprises that might be commercial rivals of the University. And it fails to consider the public harm done by turning the Research Park into a larger Business Park, such as the loss of Green Belt capital.

B1b should be the primary use class for the Research Park and applications for B1a should be resisted given the danger of diluting the core purpose and reputation of the park. The inclusion of B1c uses is inappropriate and unnecessary.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1140  Respondent: 10717985 / Alison Drennan  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

I object to changes in policy E4 Surrey Research Park as this is still represents excessive expansion, not supported by the findings of the Employment Land Needs Assessment 2017.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/13696  Respondent: 10782625 / Heather Alexander  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY E4 (SURREY RESEARCH PARK):

• Subordinates public planning policy to the University of Surrey’s private, commercial enterprises (not its public academic purpose).
• No cost/benefit analysis of harm to Green Belt involved in extending research park.
• Waters down research purpose of park, turning into a general business park.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Comment ID: PSLPP16/17532  Respondent: 10799425 / Guildford Greenbelt Group (Susan Parker)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We object to policy E4 Surrey research Park.

We support the maintenance of research, development and design activities, in any science, including social science, that is complementary to the activities of the University of Surrey at the Surrey Research Park. However, we do not believe that there is a need to expand the Research Park into a larger Business Park. We believe that the planning policy going forward for the Surrey Research Park should be to maintain and enhance the integrity of its research base allowing for the economic value add to the local economy of knowledge and technology transfer from the University. We believe that B1b (should be the primary use class for the Research Park and that applications for B1a should be resisted due to the danger of dilution of the core purpose and reputation of the park. We do not believe the inclusion of B1c uses is appropriate or necessary.

• Research parks based on the early UK technology transfer exemplars of the Cambridge and Oxford need careful monitoring, nurturing and protection to ensure the integrity and quality of the park is maintained and the park continues to be a destination for innovation and enterprise
• There is a danger for research parks to be overwhelmed by short sighted development opportunities being taken by park managers provided by standard office activities and administrative functions which in time turn them into standard business parks which can be found anywhere in the country. Their relative low density and attractiveness make them targets for “any other” office user
• Research parks that lose their way stop being the location of choice for new innovative enterprises.
• The Surrey Research Park in Guildford needs to be focussed on a broad spectrum of scientific research including computer science, bio-chemistry, design, space-science, eco-science, health science, software development, laser technology, media-science, artificial intelligence, robotics and super-manufacturing
• Monitoring indicators should include new start-ups and new patents created
• Facilities should be provided whereby new small businesses can secure premises under subsidised licence fee arrangements with no onerous rent or lease commitments
• We support the idea of a variety of sizes of unit including some small units (between 15 – 80 sq m) bearing in mind one workstation is 10 sq m
• Consideration should be given to the concept of shared “enterprise hubs” where individuals can take pay as you go workstations in shared spaces similar to touch down business centres similar to the “enterprise village” concept
• We do not support the policy of a new extension of the research park more than the existing 14% already provided for within the park
• The Surrey Research Park currently extends to 65,000 sq m
• There is already granted consent to expand to a further 9,000 sq m (14%) This space has been available for 10 years and is still to find a taker
• The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis
• The ELNA 2015 calculated annual floor space demand is 0.7%
• The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period.
• The necessary growth in floor space over the plan period is therefore 17 years x 0.7 = 12% which is less than the current expansion space of 14%.

Nature Conservation value of the site is protected or improved.

In relation to the Target there is no evidence of a justified need for additional B1a and c use. We consider that the existing land, used efficiently, will accommodate realistic expansion of B1b uses for high tech added value purposes. Existing planning permissions must be built before any additional green belt land is earmarked for development. The target of 35,000 sq metres of additional employment land are not justified by the evidence base.

We regard the evidence base (Employment Land Needs Assessment 2015) as flawed and inconsistent and therefore unreliable evidence.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to POLICY E4 - Surrey Research Park

- Subordinates public planning policy to the University of Surrey’s private, commercial enterprises (not its public academic purpose).
- No cost/benefit analysis of harm to Green Belt involved in extending research park.
- Waters down research purpose of park, turning into a general business park.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

1.1 I object to policy E4 “Surrey research Park” on the grounds that;

1.2 The expansion of the Research Park into a larger Business Park is completely unnecessary. The planning policy going forward for the Surrey Research Park should be to maintain and enhance the integrity of its research base allowing for the economic value add to the local economy of knowledge and technology transfer from the University.

1.3 That B1b should be the primary use class for the Research Park and that applications for B1a should be resisted due to the danger of dilution of the core purpose and reputation of the park. I object to the inclusion of B1c uses which is inappropriate and unnecessary.

1.4 Research parks based on the early UK technology transfer exemplars of the Cambridge and Oxford need careful monitoring, nurturing and protection to ensure the integrity and quality of the park is maintained and the park continues to be a destination for innovation and enterprise.

1.5 There is a danger for research parks to be overwhelmed by short sighted development opportunities being taken by park managers provided by standard office activities and administrative functions which in time turn them into standard business parks which can be found anywhere in the country. Their relative low density and attractiveness make them targets for “any other” office user.

1.6 The Surrey Research Park in Guildford needs to be focussed on a broad spectrum of scientific research including computer science, bio-chemistry, design, space-science, eco-science, health science, software development, laser technology, media-science, artificial intelligence, robotics and super-manufacturing.

1.7 Monitoring indicators should include new start-ups and new patents created.

1.8 Facilities should be provided whereby new small businesses can secure premises under subsidised licence fee arrangements with no onerous rent or lease commitments.

1.9 Consideration should be given to the concept of shared “enterprise hubs” where individuals can take pay as you go workstations in shared spaces similar to touch down business centres similar to the “enterprise village” concept.
I object to the policy of any new extension of the research park more than the existing 14% already provided for within the park or within the footprint of the park.

There is already granted consent to expand to a further 9,000 sq.m (14%) This space has been available for 10 years and is still to find a taker.

The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis.

The ELNA 2015 calculated annual floor space demand is 0.7%.

The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period.

The necessary growth in floor space over the plan period is therefore 17 years x 0.7 = 12% which is less than the current expansion space of 14%.

The research park is developed at a plot ratio of 25%. This could be increased to 50% within the same footprint of the existing park without damage to its amenity. The actual current land use for development in the park is in fact only 12.5% because most buildings are 2-storey.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1111  Respondent: 10846625 / Frank Drennan  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy E4  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

I object to changes in policy E4 Surrey Research Park which is still earmarked for excessive expansion which is not supported by the findings of the Employment Land Needs Assessment 2017.

I object to the extension to the Research Park of over 10 hectares will be delivered. This expansion is not effectively supported by evidence for an increase in B1b use class under the Employment Land Needs Assessment 2017.

I also object to the inclusion of B1c light industrial uses which is inappropriate and unnecessary.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2140  Respondent: 10847521 / Andrew Procter  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy E4  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1.1 I object to changes in policy E4 Surrey Research Park which is still earmarked for excessive expansion which is not supported by the findings of the Employment Land Needs Assessment 2017.
1.2 I support the maintenance of research, development and design activities, in any science, including social science, that is complementary to the activities of the University of Surrey at the Surrey Research Park. I object however to the completely unnecessary expansion of the Research Park into a larger Business Park.

1.3 I object to the extension to the Research Park of over 10 hectares will be delivered. This I understand will provide a total capacity of around 35,000 sq m of additional floorspace, of which 30,000 sq m is expected to be delivered in the plan period. This expansion is not effectively supported by evidence for an increase in B1b use class under the Employment Land Needs Assessment 2017.

1.4 I also believe that B1b (should be the primary use class for the Research Park and that applications for B1a should be resisted due to the danger of dilution of the core purpose and reputation of the park. I also object to the inclusion of B1c light industrial uses which is inappropriate and unnecessary.

1.5 Research parks based on the early UK technology transfer exemplars of the Cambridge and Oxford need careful monitoring, nurturing and protection to ensure the integrity and quality of the park is maintained and the park continues to be a destination for innovation and enterprise.

1.6 There is a danger for research parks to be overwhelmed by short sighted development opportunities being taken by park managers provided by standard office activities and administrative functions which in turn turn them into standard business parks which can be found anywhere in the country. Their relative low density and attractiveness make them targets for “any other” office user.

1.7 Research parks that lose their way stop being the location of choice for new innovative enterprises.

1.8 The Surrey Research Park in Guildford needs to be focussed on a broad spectrum of scientific research including computer science, bio-chemistry, design, space-science, eco-science, health science, software development, laser technology, media-science, artificial intelligence, robotics and super-manufacturing.

1.9 Monitoring indicators should include new start-ups and new patents created.

1.10 Facilities should be provided whereby new small businesses can secure premises under subsidised licence fee arrangements with no onerous rent or lease commitments.

1.11 The Surrey Research Park currently extends to 65,000 sq m.

1.12 The research park is developed at a plot ratio of 25%. This could be increased to 50% within the same footprint of the existing park without damage to its amenity. The actual current land use for development in the park is in fact only 12.5% because most buildings are 2-storey.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I support the maintenance of research, development and design activities, in any science including social science, that is complementary to the activities of the University of Surrey at the Surrey Research Park.

I OBJECT to the expansion of the Research Park into a larger Business Park.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** pslp171/1724  **Respondent:** 10857889 / William Kyte OBE  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The changes expanding the research park are not necessary if the existing space is used efficiently.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/18599  **Respondent:** 10858977 / Angela Otterson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to policy E4 Surrey research Park.

I support the maintenance of research, development and design activities, in any science, including social science, that is complementary to the activities of the University of Surrey at the Surrey Research Park. I object however to the completely unnecessary expansion of the Research Park into a larger Business Park. I believe that the planning policy going forward for the Surrey Research Park should be to maintain and enhance the integrity of its research base allowing for the economic value add to the local economy of knowledge and technology transfer from the University.

I believe that B1b (should be the primary use class for the Research Park and that applications for B1a should be resisted due to the danger of dilution of the core purpose and reputation of the park. I object to the inclusion of B1c uses which is inappropriate and unnecessary.

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There is a danger for research parks to be overwhelmed by short sighted development opportunities being taken by park managers provided by standard office activities and administrative functions which in time turn them into standard business parks which can be found anywhere in the country. Their relative low density and attractiveness make them targets for “any other” office user.

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Facilities should be provided whereby new small businesses can secure premises under subsidised licence fee arrangements with no onerous rent or lease commitments.

I support the idea of a variety of sizes of unit including some small units (between 15 – 80 sq m) bearing in mind one workstation is 10 sq m.

Consideration should be given to the concept of shared “enterprise hubs” where individuals can take pay as you go workstations in shared spaces similar to touch down business centres similar to the “enterprise village” concept.

I object to the policy of any new extension of the research park more than the existing 14% already provided for within the park or within the footprint of the park.

The Surrey Research Park currently extends to 65,000 sq m.

There is already granted consent to expand to a further 9,000 sq m (14%) This space has been available for 10 years and is still to find a taker.

The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis.

The ELNA 2015 calculated annual floor space demand is 0.7%.

The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period.

The necessary growth in floor space over the plan period is therefore 17 years x 0.7 = 12% which is less than the current expansion space of 14%.

The research park is developed at a plot ratio of 25%. This could be increased to 50% within the same footprint of the existing park without damage to its amenity. The actual current land use for development in the park is in fact only 12.5% because most buildings are 2-storey.

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: pslp171/1952</th>
<th>Respondent: 10859489 / Jennifer Procter</th>
<th>Agent:</th>
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<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy E4</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
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1 POLICY E4: SURREY RESEARCH PARK

1.1 I object to changes in policy E4 Surrey Research Park which is still earmarked for excessive expansion which is not supported by the findings of the Employment Land Needs Assessment 2017.
1.2 I support the maintenance of research, development and design activities, in any science, including social science, that is complementary to the activities of the University of Surrey at the Surrey Research Park. **I object** however to the completely unnecessary expansion of the Research Park into a larger Business Park.

1.3 **I object** to the extension to the Research Park of over 10 hectares will be delivered. This I understand will provide a total capacity of around 35,000 sq m of additional floorspace, of which 30,000 sq m is expected to be delivered in the plan period. This expansion is not effectively supported by evidence for an increase in B1b use class under the Employment Land Needs Assessment 2017.

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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:** PSLPP16/16004  **Respondent:** 10859553 / MARK Curtis  **Agent:** 

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

The existing Research Park has acres of surface car parking, which provides it with the opportunity to markedly increase its density without infringing any Green Belt land nearby.
I object to Policy E4 (expansion of the Surrey Research Park into the Blackwell Farm) The existing Research Park has been built at a very low density (25% plot ratio), which is very low for an urban extension. The majority of existing buildings are 2 storeys giving a developed floor space plot ratio of only 12.5%.

The existing Research Park has acres of surface car parking, which provides it with the opportunity to markedly increase its density without infringing any Green Belt land nearby. Any density increase would be cost effective for the use of all existing infrastructure and would also have the potential to match the existing density of the neighbouring academic buildings on the university campus at Manor Park, which is five times higher.

Together with the existing expansion of 14% through existing consents and the opportunity to increase its density, the Research Park has ample capacity to expand to embrace new demand for B1b uses linked to the university, without utilising additional land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/16023  **Respondent:** 10859553 / MARK Curtis  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**POLICY E4: SURREY RESEARCH PARK**

I object to policy E4 Surrey research Park.

I support the maintenance of research, development and design activities, in any science, including social science, that is complementary to the activities of the University of Surrey at the Surrey Research Park. I object however to the completely unnecessary expansion of the Research Park into a larger Business Park. I believe that the planning policy going forward for the Surrey Research Park should be to maintain and enhance the integrity of its research base allowing for the economic value add to the local economy of knowledge and technology transfer from the University.

I believe that B1b (should be the primary use class for the Research Park and that applications for B1a should be resisted due to the danger of dilution of the core purpose and reputation of the park. I object to the inclusion of B1c uses which is inappropriate and unnecessary.

Research parks based on the early UK technology transfer exemplars of the Cambridge and Oxford need careful monitoring, nurturing and protection to ensure the integrity and quality of the park is maintained and the park continues to be a destination for innovation and enterprise.

There is a danger for research parks to be overwhelmed by short sighted development opportunities being taken by park managers provided by standard office activities and administrative functions which in time turn them into standard business parks which can be found anywhere in the country. Their relative low density and attractiveness make them targets for “any other” office user.

Research parks that lose their way stop being the location of choice for new innovative enterprises.

I hope the Surrey Research Park in Guildford remains focussed on a broad spectrum of scientific research including computer science, bio-chemistry, design, space-science, eco-science, health science, software development, laser technology, media-science, artificial intelligence, robotics and super-manufacturing.

Monitoring indicators should include new start-ups and new patents created.
Facilities should be provided whereby new small businesses can secure premises under subsidised licence fee arrangements with no onerous rent or lease commitments.

I support the idea of a variety of sizes of unit including some small units (between 15 – 80 sq m) bearing in mind one workstation is 10 sq m.

Consideration should be given to the concept of shared “enterprise hubs” where individuals can take pay as you go workstations in shared spaces similar to touch down business centres similar to the “enterprise village” concept.

I object to the policy of any new extension of the research park more than the existing 14% already provided for within the park or within the footprint of the park.

The Surrey Research Park currently extends to 65,000 sq m.

There is already granted consent to expand to a further 9,000 sq m (14%) This space has been available for 10 years and is still to find a taker.

The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis.

The ELNA 2015 calculated annual floor space demand is 0.7%.

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The necessary growth in floor space over the plan period is therefore 17 years x 0.7 = 12% which is less than the current expansion space of 14%.

The research park is developed at a plot ratio of 25%. This could be increased to 50% within the same footprint of the existing park without damage to its amenity. The actual current land use for development in the park is in fact only 12.5% because most buildings are 2-storey.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11322  Respondent: 10923297 / Matthew Burnham  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY E4 (SURREY RESEARCH PARK):

- Subordinates public planning policy to the University of Surrey’s private, commercial enterprises (not its public academic purpose).
- No cost/benefit analysis of harm to Green Belt involved in extending research park.
- Waters down research purpose of park, turning into a general business park.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1713  Respondent: 10933793 / Julia Tilbury  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY E4- Surrey Research Park

I OBJECT. The Council are required by the NPPF to facilitate commercial science and technology clusters. But, as with Policies H1 and E2 above, this policy seems to be dictated more by the ambitions of Surrey University than the public interest. In an extremely tangled sentence, it says that the Research Park will be "protected for business use... in any science... that is complementary to the activities of the University of Surrey."

This fails to distinguish adequately between the University's public role as a state-funded, academic institution and its private, financial interest in profit-making business spin-offs. It ignores enterprises that might be commercial rivals of the University. And it fails to consider the public harm done by turning the Research Park into a larger Business Park, such as the loss of Green Belt social and environmental capital.

B1b should be the primary use class for the Research Park and applications for B1a should be resisted given the danger of diluting the core purpose and reputation of the park. The inclusion of B1c uses is inappropriate and unnecessary.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1685  Respondent: 10933857 / C J Tilbury  Agent: 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY E4- Surrey Research Park

I OBJECT. The Council are required by the NPPF to facilitate commercial science and technology clusters. But, as with Policies H1 and E2 above, this policy seems to be dictated more by the ambitions of Surrey University than the public interest. In an extremely tangled sentence, it says that the Research Park will be "protected for business use... in any science... that is complementary to the activities of the University of Surrey."

This fails to distinguish adequately between the University's public role as a state-funded, academic institution and its private, financial interest in profit-making business spin-offs. It ignores enterprises that might be commercial rivals of the University. And it fails to consider the public harm done by turning the Research Park into a larger Business Park, such as the loss of Green Belt social and environmental capital.

B1b should be the primary use class for the Research Park and applications for B1a should be resisted given the danger of diluting the core purpose and reputation of the park. The inclusion of B1c uses is inappropriate and unnecessary.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15370  Respondent: 10935201 / Cathryn Walton  Agent: 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT. The Council are required by the NPPF to facilitate commercial science and technology clusters. But, as with Policies H1 and E2 above, this policy seems to be dictated more by the ambitions of the University of Surrey than the public interest. In an extremely tangled sentence, it says that the Research Park will be “protected for business use… in any science… that is complementary to the activities of the University of Surrey.”

This fails to distinguish adequately between the University’s public role as a state-funded, academic institution and its private, financial interest in profit-making business spin-offs. It ignores enterprises that might be commercial rivals of the University. And it fails to consider the public harm done by turning the Research Park into a larger Business Park, such as the loss of Green Belt capital.

B1b should be the primary use class for the Research Park and applications for B1a should be resisted given the danger of diluting the core purpose and reputation of the park. The inclusion of B1c uses is inappropriate and unnecessary.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9206  Respondent: 10985057 / Anthony Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY E4 Surrey Research Park – I OBJECT. I support the maintenance of research, development and design activities, in any science, including social science, which is complementary to the activities of the University of Surrey at the Surrey Research Park. I do not, however, believe that there is a need to expand the Research Park into a larger Business Park. I believe that the planning policy going forward for the Surrey Research Park should be to maintain and enhance the integrity of its research base allowing for the economic value add to the local economy of knowledge and technology transfer from the University. I believe that B1b should be the primary use class for the Research Park and that applications for B1a should be resisted due to the danger of dilution of the core purpose and reputation of the park. I do not believe the inclusion of B1c uses is appropriate or necessary.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2455  Respondent: 11014881 / Linda Peters-Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy E4 - Surrey Research Park

I object. By protecting the university for business use and expanding the Research Park it is to the detriment of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to policy E4 Surrey research Park. I support the maintenance of research, development and design activities, in any science, including social science, that is complementary to the activities of the University of Surrey at the Surrey Research Park. I object however to the completely unnecessary expansion of the Research Park into a larger Business Park. I believe that the planning policy going forward for the Surrey Research Park should be to maintain and enhance the integrity of its research base allowing for the economic value add to the local economy of knowledge and technology transfer from the University.I believe that B1b (should be the primary use class for the Research Park and that applications for B1a should be resisted due to the danger of dilution of the core purpose and reputation of the park. I object to the inclusion of B1c uses which is inappropriate and unnecessary. Research parks based on the early UK technology transfer exemplars of the Cambridge and Oxford need careful monitoring, nurturing and protection to ensure the integrity and quality of the park is maintained and the park continues to be a destination for innovation and enterprise. There is a danger for research parks to be overwhelmed by short sighted development opportunities being taken by park managers provided by standard office activities and administrative functions which in time turn them into standard business parks which can be found anywhere in the country. Their relative low density and attractiveness make them targets for “any other” office user Research parks that lose their way stop being the location of choice for new innovative enterprises. I hope the Surrey Research Park in Guildford remains focussed on a broad spectrum of scientific research including computer science, bio-chemistry, design, space-science, eco-science, health science, softwar development, laser technology, media-science, artificial intelligence, robotics and super-manufacturing. Monitoring indicators should include new start-ups and new patents created. Facilities should be provided whereby new small businesses can secure premises under subsidised licence fee arrangements with no onerous rent or lease commitments. I support the idea of a variety of sizes of unit including some small units (between 15 - 80 sq m) bearing in mind one workstation is 10 sq m. Consideration should be given to the concept of shared “enterprise hubs” where individuals can take pay as you go workstations in shared spaces similar to touch down business centres similar to the “enterprise village” concept. I object to the policy of any new extension of the research park more than the existing 14% already provided for within the park or within the footprint of the park. The Surrey Research Park currently extends to 65,000 sq m. There is already granted consent to expand to a further 9,000 sq m (14%). This space has been available for 10 years and is still to find a taker. The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis. The ELNA 2015 calculated annual floor space demand is 0.7%. The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period. The necessary growth in floor space over the plan period is therefore 17 years x 0.7 = 12% which is less than the current expansion space of 14%. The research park is developed at a plot ratio of 25%. This could be increased to 50% within the same footprint of the existing park without damage to its amenity. The actual current land use for development in the park is in fact only 12.5% because most buildings are 2-storey.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
POLICY E4 (SURREY RESEARCH PARK) – I object. This seems to have been written by Surrey University’s business arm, in their own private interests. Where is the analysis of the cost to Green Belt amenities or services in enlarging the research park? The policy would encourage it to go down-market and become a general business park.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to policy E4 Surrey research Park.I support the maintenance of research, development and design activities, in any science, including social science, that is complementary to the activities of the University of Surrey at the Surrey Research Park. I object however to the completely unnecessary expansion of the Research Park into a larger Business Park. I believe that the planning policy going forward for the Surrey Research Park should be to maintain and enhance the integrity of its research base allowing for the economic value add to the local economy of knowledge and technology transfer from the University.I believe that B1b (should be the primary use class for the Research Park and that applications for B1a should be resisted due to the danger of dilution of the core purpose and reputation of the park. I object to the inclusion of B1c uses which is inappropriate and unnecessary. Research parks based on the early UK technology transfer exemplars of the Cambridge and Oxford need careful monitoring, nurturing and protection to ensure the integrity and quality of the park is maintained and the park continues to be a destination for innovation and enterprise.There is a danger for research parks to be overwhelmed by short sighted development opportunities being taken by park managers provided by standard office activities and administrative functions which in time turn them into standard business parks which can be found anywhere in the country. Their relative low density and attractiveness make them targets for “any other” office user Research parks that lose their way stop being the location of choice for new innovative enterprises. I hope the Surrey Research Park in Guildford remains focussed on a broad spectrum of scientific research including computer science, bio-chemistry, design, space-science, eco-science, health science, software development, laser technology, media-science, artificial intelligence, robotics and super-manufacturing. Monitoring indicators should include new start-ups and new patents created. Facilities should be provided whereby new small businesses can secure premises under subsidised licence fee arrangements with no onerous rent or lease commitments. I support the idea of a variety of sizes of unit including some small units (between 15 – 80 sq m) bearing in mind one workstation is 10 sq m. Consideration should be given to the concept of shared “enterprise hubs” where individuals can take pay as you go workstations in shared spaces similar to touch down business centres similar to the “enterprise village” concept. I object to the policy of any new extension of the research park more than the existing 14% already provided for within the park or within the footprint of the park. The Surrey Research Park currently extends to 65,000 sq m. There is already granted consent to expand to a further 9,000 sq m (14%) This space has been available for 10 years and is still to find a taker. The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis. The ELNA 2015 calculated annual floor space demand is 0.7%. The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period. The necessary growth in floor space over the plan period is therefore 17 years x 0.7 = 12% which is less than the current expansion space of 14%. The research park is developed at a plot ratio of 25%. This could be increased to 50% within the same footprint of the existing park without damage to its amenity. The actual current land use for development in the park is in fact only 12.5% because most buildings are 2-storey.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Directs 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.

Ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a].

Adds to air pollution in neighbouring areas, which already exceed safe EU limits.

If expansion is required, the first options would surely to be to increase density. There is a lot of wasted space over Surrey Research Park.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
20.2 I support the maintenance of research, development and design activities, in any science, including social science, that is complementary to the activities of the University of Surrey at the Surrey Research Park. I object however to the completely unnecessary expansion of the Research Park into a larger Business Park. I believe that the planning policy going forward for the Surrey Research Park should be to maintain and enhance the integrity of its research base allowing for the economic value add to the local economy of knowledge and technology transfer from the University.

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20.7 The Surrey Research Park in Guildford needs to be focussed on a broad spectrum of scientific research including computer science, bio-chemistry, design, space-science, eco-science, health science, software development, laser technology, media-science, artificial intelligence, robotics and super-manufacturing

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20.10 I support the idea of a variety of sizes of unit including some small units (between 15 – 80 sq m) bearing in mind one workstation is 10 sq m

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20.12 I object to the policy of any new extension of the research park more than the existing 14% already provided for within the park or within the footprint of the park

20.13 The Surrey Research Park currently extends to 65,000 sq m

20.14 There is already granted consent to expand to a further 9,000 sq m (14%) This space has been available for 10 years and is still to find a taker

20.15 The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis

20.16 The ELNA 2015 calculated annual floor space demand is 0.7%

20.17 The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/702  Respondent: 15084897 / Save Send Action Group (Andrew Procter)  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1.1 I object to changes in policy E4 Surrey Research Park which is still earmarked for excessive expansion which is not supported by the findings of the Employment Land Needs Assessment 2017.

1.2 I support the maintenance of research, development and design activities, in any science, including social science, that is complementary to the activities of the University of Surrey at the Surrey Research Park. I object however to the completely unnecessary expansion of the Research Park into a larger Business Park.

1.3 I object to the extension to the Research Park of over 10 hectares will be delivered. This I understand will provide a total capacity of around 35,000 sq m of additional floorspace, of which 30,000 sq m is expected to be delivered in the plan period. This expansion is not effectively supported by evidence for an increase in B1b use class under the Employment Land Needs Assessment 2017.

1.4 I also believe that B1b should be the primary use class for the Research Park and that applications for B1a should be resisted due to the danger of dilution of the core purpose and reputation of the park. I also object to the inclusion of B1c light industrial uses which is inappropriate and unnecessary.

1.5 Research parks based on the early UK technology transfer exemplars of the Cambridge and Oxford need careful monitoring, nurturing and protection to ensure the integrity and quality of the park is maintained and the park continues to be a destination for innovation and enterprise.

1.6 There is a danger for research parks to be overwhelmed by short sighted development opportunities being taken by park managers provided by standard office activities and administrative functions which in time turn them into standard business parks which can be found anywhere in the country. Their relative low density and attractiveness make them targets for “any other” office user.

1.7 Research parks that lose their way stop being the location of choice for new innovative enterprises.

1.8 The Surrey Research Park in Guildford needs to be focussed on a broad spectrum of scientific research including computer science, bio-chemistry, design, space-science, eco-science, health science, software development, laser technology, media-science, artificial intelligence, robotics and super-manufacturing.

1.9 Monitoring indicators should include new start-ups and new patents created.

1.10 Facilities should be provided whereby new small businesses can secure premises under subsidised licence fee arrangements with no onerous rent or lease commitments.

1.11 The Surrey Research Park currently extends to 65,000 sq m. The research park is developed at a plot ratio of 25%. This could be increased to 50% within the same footprint of the existing park without damage to its amenity. The actual current land use for development in the park is in fact only 12.5% because most buildings are 2-storey.

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Attached documents:

Comment ID: PSLPP16/2275  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 E4 Surrey research Park.

We support the maintenance of research, development and design activities, in any science, including social science, that is complementary to the activities of the University of Surrey at the Surrey Research Park. We object however to the completely unnecessary expansion of the Research Park into a larger Business Park. We believe that the planning policy going forward for the Surrey Research Park should be to maintain and enhance the integrity of its research base allowing for the economic value add to the local economy of knowledge and technology transfer from the University. We believe that B1b (should be the primary use class for the Research Park and that applications for B1a should be resisted due to the danger of dilution of the core purpose and reputation of the park. We object to the inclusion of B1c uses which is inappropriate and unnecessary.

Research parks based on the early UK technology transfer exemplars of the Cambridge and Oxford need careful monitoring, nurturing and protection to ensure the integrity and quality of the park is maintained and the park continues to be a destination for innovation and enterprise. There is a danger for research parks to be overwhelmed by short sighted development opportunities being taken by park managers provided by standard office activities and administrative functions which in time turn them into standard business parks which can be found anywhere in the country. Their relative low density and attractiveness make them targets for “any other” office user Research parks that lose their way stop being the location of choice for new innovative enterprises. We hope the Surrey Research Park in Guildford remains focused on a broad spectrum of scientific research including computer science, bio-chemistry, design, space-science, eco-science, health science, software development, laser technology, media-science, artificial intelligence, robotics and super-manufacturing.

Monitoring indicators should include new start-ups and new patents created. Facilities should be provided whereby new small businesses can secure premises under subsidised licence fee arrangements with no onerous rent or lease commitments. We support the idea of a variety of sizes of unit including some small units (between 15 – 80 sq m) bearing in mind one workstation is 10 sq m. Consideration should be given to the concept of shared “enterprise hubs” where individuals can take pay as you go workstations in shared spaces similar to touch down business centres similar to the “enterprise village” concept.

We object to the policy of any new extension of the research park more than the existing 14% already provided for within the park or within the footprint of the park. The Surrey Research Park currently extends to 65,000 sq m. There is already granted consent to expand to a further 9,000 sq m (14%). This space has been available for 10 years and is still to find a taker. The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis. The ELNA 2015 calculated annual floor space demand is 0.7%. The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period. The necessary growth in floor space over the plan period is therefore 17 years x 0.7 = 12% which is less than the current expansion space of 14%. The research park is developed at a plot ratio of 25%. This could be increased to 50% within the same footprint of the existing park without damage to its amenity. The actual current land use for development in the park is in fact only 12.5% because most buildings are 2-storey.

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Attached documents:

Comment ID: PSLPP16/3449  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 E4 - Surrey Research Park

• Subordinates public planning policy to the University of Surrey’s private, commercial enterprises (not its public academic purpose).
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• Waters down research purpose of park, turning into a general business park.

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Attached documents:

Comment ID: PSLPP16/3316  Respondent: 15327905 / Julia Cook  Agent:

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POLICY E4 - Surrey Research Park

I OBJECT. The Council are required by the NPPF to facilitate commercial science and technology clusters. But, as with Policies H1 and E2 above, this policy seems to be dictated more by the ambitions of Surrey University than the public interest. In an extremely tangled sentence, it says that the Research Park will be “protected for business use… in any science… that is complementary to the activities of the University of Surrey.”

This fails to distinguish adequately between the University’s public role as a state-funded, academic institution and its private, financial interest in profit-making business spin-offs. It ignores enterprises that might be commercial rivals of the University. And it fails to consider the public harm done by turning the Research Park into a larger Business Park, such as the loss of Green Belt social and environmental capital.

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POLICY E4 Surrey Research Park

GROUNDS FOR OBJECTION We support the maintenance of research, development and design activities, in any science, including social science, that is complementary to the activities of the University of Surrey at the Surrey Research Park. We do not believe that there is a need to expand the Research Park into a larger Business Park. We believe that the planning policy going forward for the Surrey Research Park should be to maintain and enhance the integrity of its research base allowing for the economic value add to the local economy of knowledge and technology transfer from the University. We believe that B1b (should be the primary use class for the Research Park and that applications for B1a should be resisted due to the danger of dilution of the core purpose and reputation of the park. We do not believe the inclusion of B1c uses is appropriate or necessary.

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I object to Guildford Borough Council's changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- 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 [para. 4.3.8].

- directs 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 such as Compton village.

- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]. Accessing the A31 from the top end of Down lane will become impossible.

- adds to air pollution in neighbouring areas, which already exceeds safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Policy E4 - Surrey Research Park

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Comment ID: PSLPP16/11263  Respondent: 15570209 / Emily Cross  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4
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Comment ID: PSLPP16/11448  Respondent: 15571425 / Monika Neczaj  Agent:
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Comment ID: PSLPP16/12936  Respondent: 15586017 / C Maslin  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4
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There is a danger for research parks to be overwhelmed by short sighted development opportunities being taken by park managers provided by standard office activities and administrative functions which in time turn them into standard business parks which can be found anywhere in the country. Their relative low density and attractiveness make them targets for ‘any other’ office user.

Research parks that lose their way stop being the location of choice for new innovative enterprises.

I hope the Surrey Research Park in Guildford remains focussed on a broad spectrum of scientific research including computer science, bio-chemistry, design, space-science, eco-science, health science, software development, laser technology, media-science, artificial intelligence, robotics and super-manufacturing

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<th>Comment ID: PSLPP16/14265</th>
<th>Respondent: 15601953 / Stephen Yandle</th>
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<th>Comment ID: PSLPP16/14327</th>
<th>Respondent: 15602177 / Julia Hunt</th>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
No cost/benefit analysis of harm to Green Belt involved in extending research park.
• Waters down research purpose of park, turning into a general business park.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/15703  Respondent: 15619041 / Jack Cross  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy E4 - Surrey Research Park

I support the Research Park and its specialism, but I object to the current need to expand. The land hungry current ground level car parking for Research Park should be utilised for shared multi-storey or underground parking and the freed-up car parks used for the Park development. All new Research Park development should include underground car parking, as in other countries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/15745  Respondent: 15623745 / Stella May  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to policy E4 Surrey research Park. I support the maintenance of research, development and design activities, in any science, including social science, that is complementary to the activities of the University of Surrey at the Surrey Research Park. I object however to the completely unnecessary expansion of the Research Park into a larger Business Park. I believe that the planning policy going forward for the Surrey Research Park should be to maintain and enhance the integrity of its research base allowing for the economic value add to the local economy of knowledge and technology transfer from the University. I believe that B1b (should be the primary use class for the Research Park and that applications for B1a should be resisted due to the danger of dilution of the core purpose and reputation of the park. I object to the inclusion of B1c uses which is inappropriate and unnecessary. Research parks based on the early UK technology transfer exemplars of the Cambridge and Oxford need careful monitoring, nurturing and protection to ensure the integrity and quality of the park is maintained and the park continues to be a destination for innovation and enterprise. There is a danger for research parks to be overwhelmed by short sighted development opportunities being taken by park managers provided by standard office activities and administrative functions which in time turn them into standard business parks which can be found anywhere in the country. Their relative low density and attractiveness make them targets for “any other” office users. Research parks that lose their way stop being the location of choice for new innovative enterprises. I hope the Surrey Research Park in Guildford remains focussed on a broad spectrum of scientific research including computer science, bio-chemistry, design, space-science, eco-science, health science, software development, laser technology, media-science, artificial intelligence, robotics and super-manufacturing. Monitoring indicators should include new start-ups and new patents created. Facilities should be provided whereby new small businesses can secure premises under subsidised licence fee arrangements with no onerous rent or lease commitments. I support the idea of a variety of sizes of unit including some small units (between 15 – 80 sq m) bearing in mind one workstation is 10 sq m. Consideration should be given to the concept of shared “enterprise hubs” where individuals can
take pay as you go workstations in shared spaces similar to touch down business centres similar to the “enterprise village”
conceptI object to the policy of any new extension of the research park more than the existing 14% already provided for
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buildings are 2-storey.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15997</th>
<th>Respondent: 15629025 / Surrey County Council (Sir or madam)</th>
<th>Agent:</th>
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Policy E4: Surrey Research Park

Page 74

As stated in the supporting text, the original outline planning permission for the Surrey Research Park includes a
restriction limiting use to “research that is complimentary to the activities of the University of Surrey.” To monitor this
policy there is a need to include the definition of this term from the original outline planning permission or to define what
‘complimentary to the activities of the University of Surrey’ means in terms of Standard Industrial Classification (SIC)
Codes.

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: PSLPP16/16337</th>
<th>Respondent: 15640897 / Jackie van Heesewijk</th>
<th>Agent:</th>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Economic Policies: I am in support of Policy E1 "Sustainable employment" but believe that Policy E2 "Location for new employment floorspace" fails to realise that Guildford Town Centre is relatively insignificant in economic value added terms. The University Quarter provides three times as much economic gross value added as the Town Centre yet is prejudiced by this policy. I am supportive of Policy E4 "Surrey Research Park", Policy E5 "Rural Economy" and Policy E6 "The leisure and visitor experience" but caution that Policy E7 "Guildford Town Centre" could lead to overdevelopment of the Town Centre.

**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 E4 Surrey Research Park.

I support the maintenance of research, development and design activities, in any science, including social science, that is complementary to the activities of the University of Surrey at the Surrey Research Park. I object however to the completely unnecessary expansion of the Research Park into a larger Business Park. I believe that the planning policy going forward for the Surrey Research Park should be to maintain and enhance the integrity of its research base allowing for the economic value add to the local economy of knowledge and technology transfer from the University.

I believe that B1b (should be the primary use class for the Research Park and that applications for B1a should be resisted due to the danger of dilution of the core purpose and reputation of the park. I object to the inclusion of B1c uses which is inappropriate and unnecessary.

Research parks based on the early UK technology transfer exemplars of the Cambridge and Oxford need careful monitoring, nurturing and protection to ensure the integrity and quality of the park is maintained and the park continues to be a destination for innovation and enterprise.

There is a danger for research parks to be overwhelmed by short sighted development opportunities being taken by park managers provided by standard office activities and administrative functions which in time turn them into standard business parks which can be found anywhere in the country. Their relative low density and attractiveness make them targets for “any other” office user.

Research parks that lose their way stop being the location of choice for new innovative enterprises.

I hope the Surrey Research Park in Guildford remains focussed on a broad spectrum of scientific research including computer science, bio-chemistry, design, space-science, eco-science, health science, software development, laser technology, media-science, artificial intelligence, robotics and super-manufacturing.

Monitoring indicators should include new start-ups and new patents created. Facilities should be provided whereby new small businesses can secure premises under subsidised licence fee arrangements with no onerous rent or lease commitments.
I support the idea of a variety of sizes of unit including some small units (between 15 – 80 sq m) bearing in mind one workstation is 10 sq m

Consideration should be given to the concept of shared “enterprise hubs” where individuals can take pay as you go workstations in shared spaces similar to touch down business centres similar to the “enterprise village” concept

I object to the policy of any new extension of the research park more than the existing 14% already provided for within the park or within the footprint of the park

The Surrey Research Park currently extends to 65,000 sq m

There is already granted consent to expand to a further 9,000 sq m (14%) This space has been available for 10 years and is still to find a taker

The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis

The ELNA 2015 calculated annual floor space demand is 0.7%

The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period.

The necessary growth in floor space over the plan period is therefore 17 years x 0.7 = 12% which is less than the current expansion space of 14%.

The research park is developed at a plot ratio of 25%. This could be increased to 50% within the same footprint of the existing park without damage to its amenity. The actual current land use for development in the park is in fact only 12.5% because most buildings are 2-storey.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17750  
Respondent: 15699777 / ANGLE plc (Ian Griffiths)  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

ANGLE wrote to the Council during the last consultation of the Local Plan. I should like to reiterate our support for the University of Surrey/Surrey Research Park (SRP). Our support reflects the fact that we believe the University and SRP are very well placed to continue to achieve major economic impacts on the area and we are concerned that capacity constraints could have a negative impact in retaining and attracting highly skilled workers.

We support:

- Improved access to the west from the SRP - there are few negatives about working at SRP but access and traffic congestion is one of
- Future expansion of the Research Park will ensure for us and many other companies on the Park the potential for continuity as we
- Additional affordable housing would help with the development and retention of the young science graduates ANGLE needs to employ in the development of its revolutionary cancer diagnostic
- While acknowledging any changes to the green belt are contentious, the company supports the necessary planning processes and strategies to achieve these features of the proposed plan
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17196</th>
<th>Respondent: 15746081 / Highways England (Patrick Blake)</th>
<th>Agent:</th>
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<tbody>
<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>
<tr>
<td>[Highways England made a formal representation on 18 July 2016. See the first attachment for this representation including comments on this element of the consultation documents and/or associated evidence base. Highways England made further comments on 5 October 2016 following a clarification meeting with Guildford Borough Council. See the second attachment for this letter.]</td>
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</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  
- Highways England letter 18 July 2016 - Representation to consultation.pdf (7.7 MB)  
- Highways England letter 5 October 2016 - Further comments following clarification meeting with GBC.pdf (1.2 MB)

<table>
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<tr>
<th>Comment ID: pslp171/1249</th>
<th>Respondent: 15805601 / Guildford Greenbelt Group (Sir or madam)</th>
<th>Agent:</th>
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<td></td>
<td>We object to changes in policy E4 Surrey Research Park which is still earmarked for excessive expansion which is not supported by the findings of the Employment Land Needs Assessment 2017</td>
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<td></td>
<td>We support the maintenance of research, development and design activities, in any science, including social science, that is complementary to the activities of the University of Surrey at the Surrey Research Park. We object however to the completely unnecessary expansion of the Research Park into a larger Business Park. We object to the extension to the Research Park of over 10 hectares will be delivered. This I understand will provide a total capacity of around 35,000 sq m of additional floorspace, of which 30,000 sq m is expected to be delivered in the plan period. This expansion is not effectively supported by evidence for an increase in B1b use class under the Employment Land Needs Assessment 2017. We also believe that B1b (should be the primary use class for the Research Park and that applications for B1a should be resisted due to the danger of dilution of the core purpose and reputation of the park. We also object to the inclusion of B1c light industrial uses which is inappropriate and unnecessary. Research parks based on the early UK technology transfer exemplars of the Cambridge and Oxford need careful monitoring, nurturing and protection to ensure the integrity and quality of the park is maintained and the park continues to be a destination for innovation and enterprise. There is a danger for research parks to be overwhelmed by short sighted development opportunities being taken by park managers provided by standard office activities and administrative functions which in time turn them into standard business parks which can be found anywhere in the country. Their relative low density and attractiveness make them targets for “any other” office user Research parks that lose their way stop being the location of choice for new innovative enterprises. The Surrey Research Park in Guildford needs to be focussed on a broad spectrum of scientific research including computer science, bio-chemistry, design, space-science, eco-science, health science, software development, laser technology, media-science, artificial intelligence, robotics and super manufacturing Monitoring indicators should include new start-ups and new patents created.</td>
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<th>Comment ID: PSLPP16/15562</th>
<th>Respondent: 15977889 / Charles Kimpton</th>
<th>Agent:</th>
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**OBJECT.** Inclusion of B1c is unnecessary and B1a dilutes the goal of maintaining a high quality Research Park. B1b is should be the primary use.

**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: pslp171/525</th>
<th>Respondent: 17288257 / Patrick Mason</th>
<th>Agent:</th>
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The fundamental traffic problems around the Surrey Hospital, Research Park and through into Guildford town centre are essentially choking business in the area and driving people out … we are one such company happy to be leaving! This “proposal” to develop the area further, will only serve to exacerbate an already poor situation.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: pslp171/866</th>
<th>Respondent: 17308705 / University of Surrey</th>
<th>Agent: Terence O'Rourke (Steve Molnar)</th>
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Policy E4

The University supports the changes to this policy.

Para 4.4.41
The University supports the change to reflect the number of homes now being provided at the Blackwell Farm site (Policy A26; up from 1650 to 1800).

An amount to be provided in the plan period (1500) is also mentioned, but the University understands that this not a constraint and is included for the robustness of GBCs phasing proposals. It is understood that the plan is not seeking to prevent the full 1800 from coming forward in the plan period if infrastructure provision and market conditions allow.

The reference to the 1500 homes in para 4.4.41 should therefore make this point clear.

The University notes that para 4.4.41 refers to 35,000 sq m of employment land in total at the site, of which 30,000 will be in the plan period. However policy A26 now refers to only 30,000 sq m in full.

The University therefore considers that there is possibly an error in this statement in para 4.4.41. The text in this paragraph should be consistent with Policy A26 and refer only to 30,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

See text above.

Attached documents:

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Policy E4: Surrey Research Park

This representation is made on behalf of BOC Limited who is a major employer both across the UK and within Guildford specifically as their UK headquarters are based on the Surrey Research Park.

BOC is strongly supportive of the general thrust of the plan and specifically welcome the designation of the Surrey Research Park (SRP) as a Strategic Employment Site under policy E1, the extension of SRP under policy E4 and the job targets set out across the other employment policies. These clearly reflect the evidence base (including the ELNA 2017) which confirms the importance of SRP to the local economy.

However, there are elements of Policy E4: Surrey Research Park which BOC is concerned are at risk of being found 'unsound'.

Part 1 of policy E4 seeks to restrict the existing SRP and the proposed extension detailed in A26 to: ‘business use comprising offices, research, development, design and innovation activities, in any science, including social science, falling within Use Classes B1 (a), (b) and (c) of the Town and Country Planning (use Classes) Order 1987 (as amended), that is complementary to the activities of the University of Surrey’.

Whilst BOC is supportive of the overall policy objectives and broad thrust of this policy there is concern that the restriction of business uses to those ‘in any science...that is complementary to the activities of the University of Surrey’ is potentially overly restrictive and inflexible.

This is considered to particularly be the case for those businesses operating on the existing SRP, some of whom have been in place for a number of years and who require the flexibility to amend or expand their operations in response to their particular corporate requirements.
Whilst the existing flexibility of criterion (3) is appreciated, it is considered that the policy would best be reformulated to be more reflective of the differences between the needs of existing established businesses operating from the SRP, and the new businesses which would be attracted to the SRP extension.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Policy changes sought:

BOC request that Policy E4 is simplified and amended such that the policy deals solely with the extension to SRP as shown in policy A26, with restrictive provisions on new businesses uses within this area as appropriate. This would allow the existing businesses on the existing SRP to be governed by policies E1 and E2, with a less onerous restriction to general B1 uses, particularly head office functions.

**Attached documents:**

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**Comment ID:** pslp171/1560  **Respondent:** 17405217 / M Greene  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy E4

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

We object to policy E4 Research Park expansion and we object to policy A26 Blackwell Farm.

The Council are proposing development on AONB, AGLV and Greenbelt land where there is no special circumstances and where such development will add to congestion and air quality issues which are already of serious concern to Residents and Businesses.

The Council objected to Waverley Plans for development at Dunsfold siting the impact of extra traffic, congestion etc to the A3 and also the Council object to development of a School and Housing at Fairlands (Rokers) in Worpleston as inappropriate development which failed to mitigate its impact on infrastructure and the impact on the habitat of flora and fauna and the Council planning officers referred to the fact that the site was in the Greenbelt where there is a general presumption against inappropriate development. The Council Officers further stated that large scale residential development and a new school are inappropriate development which could only be approved in very special circumstances where the benefits outweigh the harm the development would cause. The Council Officers stated a school and housing do not amount to the very special circumstances necessary to justify grant of a planning application. However the Council include in their draft plan building on Blackwell Farm an area of outstanding natural beauty, Area of great landscape value and all in the Green Belt a school or schools and housing. No special circumstances are associated with this proposed development. Any attempt to argue economic necessity for expansion of the Research Park is negated as there is sufficient land and surface car parking at the existing Research Park and Manor Farm to allow expansion for the next 25 years without allocating more greenbelt land. The Research Park is a name only as many businesses on the existing park are just that businesses and with no great attachment to the University or research.

We therefore find it hypocritical of the Council to include Blackwell Farm in the revised Draft Local Plan. The extra traffic, congestion, delays and further damage to the air quality development at Blackwell Farm which would directly impinge on the two most congested junctions in Guildford at Egerton Road / A3 and A31 /A3.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp171/1561  **Respondent:** 17405217 / M Greene  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy E4
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Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

Document part: Policy E5 - Rural Economy
POLICY E5: Rural Economy

The Guildford Society has no objection in principle to the amendments to Policy E5.

We agree the Council’s plans to support the local economy. We note, however, that the plan is silent on the planned frequency increase on the North Downs Railway Line which we believe provides an opportunity to bring small scale enterprises in the Dorking to Guildford and Ash to Guildford corridors into good contact with the Town Centre and Surrey Research Park on a sustainable basis. The plan highlights that stations such as Shalford will not be transport interchanges, whereas we believe some minor development of bus services and parking may be desirable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

WHPC view:
Supports

In brief:
Cumulative effects of rural economic development need to be monitored / controlled to ensure no harm to openness of Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

WHPC supports this policy, though the cumulative effects of rural economic development need to be monitored and controlled to ensure there is no harm to the openness 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)

<table>
<thead>
<tr>
<th>Policy No. and title</th>
<th>2016 WHPC position</th>
<th>2016 WHPC comment in brief</th>
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<tbody>
<tr>
<td>E5 – Rural Economy</td>
<td>Supports</td>
<td>Cumulative effects of rural economic development need to be monitored / controlled to ensure no harm to openness of Green Belt</td>
<td>Supports in principle</td>
<td>Strong controls on new development in any rural area of the Borough. The recently published (without any Consultation with Parishes) Rural Economy Strategy suggests that new enterprise requiring new facilities will be waved through without consideration any possible harm that may result.</td>
</tr>
</tbody>
</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to policy E5 Rural Economy. In my opinion, this policy should only apply to small-scale development in rural areas which means development of less than 100 sq m (gross) which is in keeping with and the permanence and amenity of the green belt. Use of rural areas for town centre uses without applying the sequential approach is against the principles of localism that require local people to be consulted and heeded, not ignored. Villages need protecting in terms of both design and scale and character. Previous commitments to improved high-speed broadband and mobile phone coverage have now been diluted, despite general support. This disregards the responses from the 2014 public consultation.

The consultation process was not well publicized; many Parish Councils had no idea of this. The emphasis on voluntary efforts and greater community efforts is far removed from reality for this 'solution' was presented for almost every aspect of rural life from managing crime to looking after elderly to education and more besides. Villages by nature are usually small and the percentage of the population who are able to do voluntary work is smaller still. The solution is therefore unworkable. The results of the consultation were not publicized but were instead collated and summarized and bore no resemblance to the submissions I had sight of.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2333  Respondent: 8570273 / Fiona Curtis  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? (No ), is Legally Compliant? ()

Rural Economy

Throughout this policy there is an assumption in favour of sustainable rural development in order to support economic need, as stated in the NPPF. It should also be noted that the NPPF guidance states:

- support sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside. This should include supporting the provision and expansion of tourist and visitor facilities in appropriate locations where identified needs are not met by existing facilities in rural service centres
- promote the retention and development of local services and community facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship

This policy is driven by rural businesses. The main stakeholders are rural businesses and even the forum at which findings are represented is at a paid ticket event for local business. Communities have been largely removed from the policymaking, and tourist's views are represented by a relatively small and select sector. Parish Councils were contacted very late in the day and hence had little time to respond. On gathering their submissions, I am able to see that their views were not included in the summary findings and neither were views of residents groups (as they were not included at all).

I believe that the consultation process fell short of what would be expected and hence I object to this policy.
The creation of new business opportunities must be balanced with the needs of the farming industry. I support this statement but feel it should also include the rural community. It seems that residents have been completely disenfranchised under this strategy? Whilst I agree with the need for balance, I fail to see how this is reflected when 3 very large good grade agricultural sites (Wisley, Blackwell Farm & Gosden Hill) have been put forward for development?

The Council will also work with partners to support the provision of small-scale business incubation centres in rural areas. I support the ethos behind this, however new business ventures must be truly sustainable and this means on a regular bus or train route to avoid the introduction of more cars into rural areas that are ill equipped to cope. The buildings must also be in keeping with the vernacular and on an appropriate scale.

(5) Proposals that would result in the loss of shops and services that provide for everyday needs (within Use Class A1) located in rural areas but outside of Local and District Centres, will only be acceptable if evidence is provided of active and comprehensive marketing of the site for its current use for a minimum of 12 prior to submission of a planning application.

I agree with this in principal but cannot see why this does not also apply to local or district centres? The policy has omitted to say 12 what? Ie weeks, months? The strategy is most definitely not aimed at protecting natural and built heritage.

If it were it would make more of the ancient monument at Blackwell farm and the enormous amount of history and heritage that accompanies the area. The area has a vineyard a horse sanctuary and of course Watts Gallery, Limnerslease and Chapel. It was once a royal park and much more could be made of the combined heritage assets, yet this has not been considered. If it has been looked at and rejected, then please send the report to Compton Parish Council and to me.

I object to the lack of consultation on this policy.

Most Parish Councils knew nothing about it and I had to request an extension to the deadline to enable them to take part. As the launch date for the publication of the policy had already been set (only weeks away from the dead line at a
ticket only conference) it is likely that many felt this policy was a 'fait accompli'.

<table>
<thead>
<tr>
<th>The Strategy covers the River Wey catchment and will link Parish Councils, businesses and other local organisations in rural Guildford, for example, Surrey Hills AONB, Surrey Wildlife Trust, University of Surrey, and also the neighbouring boroughs of Waverley and Woking. Key to the strategy is continuous engagement between all these organisations on aspects of policy, planning and delivery. Delivery of the Strategy will be monitored by Guildford Business Forum’s Rural Group whose members include environmentalists, farmers, landowners and producers.</th>
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<tr>
<td>The delivery of the strategy should not be via any group that cannot be impartial (ie who benefit financially from rural development). I can see no reason why the University of Surrey should be included as a stakeholder, particularly given their position as a major developer? I am concerned about the lack of impartiality when those with a financial interest become directly or indirectly involved in conservation matters. This does not result in 'balance' but in 'imbalance' as policies have been weakened and the strategy is not reciprocated ie businesses such as the University do not have conservationists on their team? I cannot find any details about the Guildford Business Forum? Who are they, how were they elected, are the meetings public and if so where are they advertised and where are the minutes? If the group is tasked with shaping the development of the rural economy then decisions must be public and inclusive of the rural community.</td>
</tr>
<tr>
<td>Object</td>
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<tr>
<th>4.4.51b These provide low cost, flexible office space for start-up businesses and nomad working and may be able to provide faster internet than at residential properties along with the benefits of interacting with other local entrepreneurs.</th>
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<tr>
<td>Fast broadband for businesses should be widely available and hence they should not need access to special units for delivery.</td>
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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: pslp171/282  Respondent: 8571521 / Surrey Nature Partnership (Sarah Jane Chimbwandira)  Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E5</td>
</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>
With reference to para 4.4.51a, the Surrey Nature Partnership has been consulted on the development of the Rural Economic Strategy, and has influenced this document’s solid reference to the natural capital investment approach in Guildford Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13044  Respondent: 8573793 / Harry Eve  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object

69. This appears to be a policy to encourage growth in rural areas regardless of actual local needs and opinions. The last sentence appears to apply small-scale town centre uses to rural areas but with less consideration regarding location. This rather sums up Guildford Borough Council’s current unsatisfactory attitude towards its rural areas.

70. I am concerned about the emphasis on accepting agricultural developments regardless without consideration for their impact on the natural environment. The North Downs is an extremely important area for biodiversity but this policy could encourage landowners to destroy our chalk grasslands in favour of vineyards and other crops. Chalk grassland is a scarce habitat in international terms and Guildford has a duty to conserve what is left in the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1695  Respondent: 8573793 / Harry Eve  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E5
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I have serious concerns about the Rural Economic Strategy and involvement of Enterprise M3 LEP mentioned in the new paragraphs 4.4.51a and 4.4.51b. For example, the Strategy regards opposition and resistance to proposals as “Threats” implying that development has priority over genuine objections.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7008  Respondent: 8575617 / Effingham Parish Council (Ian Symes)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
E5 Economy– Rural Economy

Support

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17559  Respondent: 8581505 / Burpham Neighbourhood Forum (Jim Allen)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy acceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2201  Respondent: 8581505 / Burpham Neighbourhood Forum (Jim Allen)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Incubation centre; needs defining and “subject to other policies in this Plan” should be added to the policy.

[Page 86, paragraph Policy E5, (2)]

4.4.48a
Link to Appendix 2 should be annotated “Appendix 2 forms part of this policy”

4.4.51a
We question the validity of the Rural Economic Strategy as a background document as it has not been subject to public scrutiny and has been inserted into this Plan post-Regulation 19 stage. The Document has been formulated to match the Local Plan already in existence rather than researched and the information used to form the solid foundation of this Plan. The Plan ignores areas both to the east and west viz Mole Valley and Rushmoor and makes no mention of Neighbourhood Plans.

4.4.52
Enterprise M3 LEP is not a statutory body but a quango, based some considerable distance from the Borough in Winchester, with no publically visible ties to the Borough. None of their reports and suggestions are open to public scrutiny.


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)

Comment ID: PSLPP16/12171  Respondent: 8582017 / The Clandon Society (J Wright)  Agent:
I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

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<td>PSLPP16/8075</td>
<td>8587489 / University of Surrey (Malcolm Parry)</td>
<td></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy E5</td>
<td>I am supportive of........Policy E5 “Rural Economy”</td>
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<tr>
<td>pslp171/3360</td>
<td>8591329 / The House of Commons (Anne Milton MP)</td>
<td></td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy E5</td>
<td>Policy E5 – I am pleased to see reinforcement of the need to keep our rural shops and services.</td>
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<tr>
<td>PSLPP16/1259</td>
<td>8608865 / WBDRA. (David Bird)</td>
<td></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy E5</td>
<td>WBDRA SUPPORTS this policy</td>
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<tr>
<td>PSLPP16/9092</td>
<td>8609377 / Mr Andy White</td>
<td></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy E5</td>
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Comment ID: PSLPP16/9849  Respondent: 8627393 / Worplesdon Parish Council (Gaynor White)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

E5  Rural Economy  Support.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/461  Respondent: 8640353 / Julian Cranwell  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy E5: Rural Economy

Response

Summary

This policy should only apply to small-scale development in rural areas which means development of less than 100 sq m (gross) which is in keeping with and the permanence and amenity of the green belt.

Use of rural areas for town centre uses without applying the sequential approach is against the principles of localism which mean that local people should be consulted – and heeded (not ignored!). Villages need protecting both in terms of design and in terms of scale.

Previous commitments to improved high-speed broadband and mobile phone coverage have now been diluted, despite general support. This is disregarding the responses from the previous consultation.

Detailed response:

It should be noted that the NPPF “provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans which reflect the needs and priorities of their communities.” (NPPF 1).
Guildford becoming a Growth Hub was NOT in the election manifesto. This policy was mentioned only tangentially in the corporate plan. Given Guildford’s poor transport links, noted congestion and the problems that this is perceived to cause for existing businesses, this does not seem an appropriate decision.

This radical, unsupported policy change is apparently in order to generate "growth" - although the possibility is that too much building over the areas that make Guildford Borough attractive will actually generate damage and stagnation, and cause a net decline in local affluence and growth. This risk has been highlighted by some local business leaders in the press.

In addition to NPPF 1, the Core Planning Principles set out in NPPF 17 include, as the FIRST (and therefore most important) principle, that “planning should:

- Be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area”.

Furthermore, if this were not enough, in the section on Plan-making, NPPF 155 states:

“Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. [It is not clear that early collaboration with prospective developers is either required or legal]. A wide section of the community should be proactively engaged so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made”.

Local People are supposed to be represented within the NPPF, and any plan which does not meet with the consent of local people is arguably unsound. The failure to amend a plan following consultation, and to take the points made into account, is arguably in breach of NPPF and is therefore at risk of consequential challenge. A policy that is unsupported by the local community should be considered to be unsound.

It is arguable that GBC is arguing aggressively for a pro-development strategy in relation to villages and the Green Belt and mis-stating national policy as a result.

Many of the proposed “main town centre” uses would not be appropriate either to the Green Belt or villages within it - indoor bowling, casinos, warehouses etc. would not be appropriate for most villages in Surrey.

The provision and take up of reliable and high speed broadband, and the increased impact of home working and smart working are welcomed. Access to high speed broadband as a priority is welcomed and this is one of few aspects of the LEP’s policy that is welcomed in relation to the rural environment.

In this context, it seems entirely inappropriate that a monitoring indicator is net additional employment floorspace completed by category. “Smart” and home-working do not involve incremental floorspace and to evaluate incremental economic growth by the size of floorspace allocated is an inappropriate measure in the Green Belt. By definition such work uses do not require space. It is important to recognize – as this Local Plan does not – that the main employment within the countryside is related to that countryside, whether due to agriculture, tourism (so that “unproductive” or open space land has a positive economic impact too), film, or ancillary activities related to the above, and that to reduce the countryside footprint by building sites is to reduce economic land. The only use of land that has no ongoing positive impact for the community is to use it as a building site, whereupon it is lost in terms of ongoing economic benefit to all except the future owners.

NPPF 17 requires that local authorities “always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings”, and that they “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, recognizing the intrinsic character and beauty of the countryside and supporting thriving communities within it”. To appraise building within the Green Belt merely in terms of numbers of buildings or net additional floorspace does not meet the requirements of those principles.
The rural areas currently have a vibrant and strong economy, and building should not be regarded as a major objective. Existing agriculture, food production, tourism and film industries rely on our existing countryside, and to substitute these by building warehouses, commercial space or even processing space for ancillary agricultural processing will be to damage the environment for no economic gain. The loss of agricultural land is to be avoided; food security is an increasingly important factor in a congested island with an increasingly population based in the temperate zone so that it can supply food without climate stress; as noted by Cambridge University we will need more food producing land, not less, over the next few decades (see study attached to previous submission, disregarded).

Villages should be protected; new building in villages should be within the existing settlement boundaries, and new settlement boundaries should only reflect the historic changes of the settlement areas; building should not extend into the open countryside of the Green Belt; and new building should focus on brownfield sites within the urban areas.

I support the proposal for high speed broadband but are disappointed that the previous reference to this specifically “Provision and take-up of reliable and high speed broadband has been a major issue reported by rural businesses. Access to key services vital for economic growth is often poor in rural areas. Slow broadband and inadequate and slow mobile phone coverage are constraints to economic development” has now been modified to refer only to “provision of internet services where needed in rural areas and enhance digital inclusion in such areas”. This must be modified to read “provision of high speed internet services and reliable mobile phone coverage to all rural areas etc”. In the prior consultation, a matter that was warmly welcomed by most respondents has now been significantly weakened.

I agree that high speed broadband is a desirable attribute for the wider economy, and that this is particular lacking in the rural areas of Guildford. However, its introduction should lead to an increase in smart home-working, rather than the building of additional employment space. The policy needs to include a commitment to get super fast broadband accessible by all residents in the borough as this will provide much greater support to rural industry than anything else.

In this context, a monitoring indicator of “Number of sq m of B Class floorspace permitted and completed in rural wards” is fundamentally wrong; the indicator used for monitoring should be independent of land use, or this creates a perverse incentive to build on land. It should be related to real economic growth – for example, incremental corporation and personal tax income generated by businesses and individuals based within the borough.

Furthermore, as ever, the urban-guided planning philosophy also entirely fails to recognize the real phenomenon of rural employment. Some of this is genuine “smart” growth of the kind that the council ought to be promoting, and states that they are keen to encourage. Faster broadband, where it exists, is a genuinely useful tool which allows remote working for the highly educated populace. The University of Surrey generates a significant proportion of this highly skilled group. It also boasts about the highly skilled external population and the high calibre of local residents in its publicity material. The Surrey Hills AONB is proud to be classified by government as an “Elite Employment Enclave” where a high proportion of around 40% of households include a company director; such groups can often work flexibly. However, too much industrialization, commercialization and physical building in a rural environment will result in a change in the environment that attracts these flexible and affluent members of the community, and would result in these same groups moving to a more desirable and pleasant location. This would have a negative impact on the local economy. This consideration, while noted in public meetings in relation to the Surrey Hills by the Surrey Hills AONB board, has a general application to the borough as a whole.

In addition to smart-working among an educated group, and its economic upside, there is the fact that the rural area is founded on an agricultural framework that has persisted for two thousand years and is a viable, successful and profitable series of businesses. The land on which GBC proposes to build is viable and profitable agricultural land which supports existing businesses. Some of these are simple farms, producing food which our country needs. This should not be underestimated. The University of Cambridge has noted a significant decline in the UK’s food security or ability to feed itself – a significant factor in an era of increased climate change and global insecurity. This report, produced in conjunction with a number of other groups including CLA (Country Landowners’ Association), NFU (National Farmers’ Union), Sainsbury’s, Asda and Nestlé noted that the UK would require up to 7 million hectares more agricultural land to meet the country’s needs for food by 2030, roughly the period covered by the plan. To replace valuable and necessary agricultural land with storage depots or warehouses which will make the environment
unpleasant for residents, destroy viable agricultural businesses, and that are likely to remain empty and unprofitable unless they undercut existing viable depots elsewhere, seems to benefit only those who build the depots.

While there is ostensible recognition of the importance of agriculture, this is subverted by suggesting that the provision of new and larger buildings is essential to agriculture and forestry. I would dispute this contention.

In addition to the essential business of food production, an increasing number of our farmers are engaged in high added value food processing and delivery, which is also an extremely profitable business and of growing local interest. This does not, however, necessitate large scale building. The Surrey Hills label is helpful in this regard, as is noted in the context of the policy. Silent Pool gin and sparkling wine, The Tillingbourne Trout Farm, the Kingfisher Watercress beds, the raising of beef, lamb, pork, and poultry in the Surrey Hills at Drydown Farm or Manor Farm; the Hog’s Back brewery, fruit grown throughout the borough and many other businesses are of enormous significance to the borough and should be encouraged. It will be harder to cultivate a label advertising premium quality organic food from the North Downs if Guildford becomes known principally as a storage or warehousing area.

Economic growth is indeed needed by the country. Some of that growth is perhaps needed in Surrey, although we already produce a disproportionate share of the national wealth and are the most densely populated rural county. Many would argue that this is not an appropriate destination for economic pump-priming and that areas which have more need of employment, (for example in the Black Country, the North West, the North East or Wales) would be better recipients of public finance to encourage economic growth. We don’t particularly want it; we don’t particularly need it; and we are trying to cope with the organic growth we have, we certainly don’t need to stimulate it further. The unelected and undemocratic M3 LEP has a stated agenda, evidenced by its minutes (subsequently expurgated), of actively influencing government policy in relation to housebuilding; and this is perhaps because house builders sit on the Land and Property Group of the M3 LEP. This constitutes an unacceptable conflict of interest.

The ability to generate wealth is not related to the size or number of warehouses built. This is unintelligent and old thinking – wealth is not related to the size of storage space. The monitoring of sq m of B class floorspace completed in rural wards is entirely inappropriate.

The Key Evidence summary notes that the evidence base includes the Guildford Borough Rural Economic Strategy which is yet to be published and therefore (by definition) cannot have informed this policy or the decisions which have been taken in order to arrive at it. To determine a policy on the basis of a non-existent evidence base, which is only provided (or indeed drafted) post hoc, must be legally indefensible.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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We object to policy E5 Rural Economy

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It should be noted that the NPPF “provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans which reflect the needs and priorities of their communities.” (NPPF 1).

Guildford becoming a Growth Hub was NOT in the election manifesto. This policy was mentioned only tangentially in the corporate plan. Given Guildford’s poor transport links, noted congestion and the problems that this is perceived to cause for existing businesses, this does not seem an appropriate decision.

This radical, unsupported policy change is apparently in order to generate “growth” - although the possibility is that too much building over the areas that make Guildford Borough attractive will actually generate damage and stagnation, and cause a net decline in local affluence and growth. This risk has been highlighted by some local business leaders in the press.

In addition to NPPF 1, the Core Planning Principles set out in NPPF 17 include, as the FIRST (and therefore most important) principle, that “planning should:

- Be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area”.

Furthermore, if this were not enough, in the section on Plan-making, NPPF 155 states:

“Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. [It is not clear that early collaboration with prospective developers is either required or legal]. A wide section of the community should be proactively engaged so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made”.

Local People are supposed to be represented within the NPPF, and any plan which does not meet with the consent of local people is arguably unsound. The failure to amend a plan following consultation, and to take the points made into account, is arguably in breach of NPPF and is therefore at risk of consequential challenge. A policy that is unsupported by the local community should be considered to be unsound.

It is arguable that GBC is arguing aggressively for a pro-development strategy in relation to villages and the Green Belt and mis-stating national policy as a result.

Many of the proposed “main town centre” uses would not be appropriate either to the Green Belt or villages within it - indoor bowling, casinos, warehouses etc. would not be appropriate for most villages in Surrey.

The provision and take up of reliable and high speed broadband, and the increased impact of home working and smart working are welcomed. Access to high speed broadband as a priority is welcomed and this is one of few aspects of the LEP’s policy that is welcomed in relation to the rural environment.

In this context, it seems entirely inappropriate that a monitoring indicator is net additional employment floorspace completed by category. “Smart” and home-working do not involve incremental floorspace and to evaluate incremental economic growth by the size of floorspace allocated is an inappropriate measure in the Green Belt. By definition such work uses do not require space. It is important to recognize – as this Local Plan does not – that the main employment within the countryside is related to that countryside, whether due to agriculture, tourism (so that “unproductive” or open space land has a positive economic impact too), film, or ancillary activities related to the above, and that to reduce the countryside footprint by building sites is to reduce economic land. The only use of land that has no
ongoing positive impact for the community is to use it as a building site, whereupon it is lost in terms of ongoing economic benefit to all except the future owners.

NPPF 17 requires that local authorities “always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings”, and that they “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, recognizing the intrinsic character and beauty of the countryside and supporting thriving communities within it”. To appraise building within the Green Belt merely in terms of numbers of buildings or net additional floorspace does not meet the requirements of those principles.

The rural areas currently have a vibrant and strong economy, and building should not be regarded as a major objective. Existing agriculture, food production, tourism and film industries rely on our existing countryside, and to substitute these by building warehouses, commercial space or even processing space for ancillary agricultural processing will be to damage the environment for no economic gain. The loss of agricultural land is to be avoided; food security is an increasingly important factor in a congested island with an increasingly population based in the temperate zone so that it can supply food without climate stress; as noted by Cambridge University we will need more food producing land, not less, over the next few decades (see study attached to previous submission, disregarded).

Villages should be protected; new building in villages should be within the existing settlement boundaries, and new settlement boundaries should only reflect the historic changes of the settlement areas; building should not extend into the open countryside of the Green Belt; and new building should focus on brownfield sites within the urban areas.

We support the proposal for high speed broadband but are disappointed that the previous reference to this specifically “Provision and take-up of reliable and high speed broadband has been a major issue reported by rural businesses. Access to key services vital for economic growth is often poor in rural areas. Slow broadband and inadequate and slow mobile phone coverage are constraints to economic development” has now been modified to refer only to “provision of internet services where needed in rural areas and enhance digital inclusion in such areas”. This must be modified to read “provision of high speed internet services and reliable mobile phone coverage to all rural areas etc”. In the prior consultation, a matter that was warmly welcomed by most respondents has now been significantly weakened.

We agree that high speed broadband is a desirable attribute for the wider economy, and that this is particular lacking in the rural areas of Guildford. However, its introduction should lead to an increase in smart home-working, rather than the building of additional employment space. The policy needs to include a commitment to get superfast broadband accessible by all residents in the borough as this will provide much greater support to rural industry than anything else.

In this context, a monitoring indicator of “Number of sq m of B Class floorspace permitted and completed in rural wards” is fundamentally wrong; the indicator used for monitoring should be independent of land use, or this creates a perverse incentive to build on land. It should be related to real economic growth – for example, incremental corporation and personal tax income generated by businesses and individuals based within the borough.

Furthermore, as ever, the urban-guided planning philosophy also entirely fails to recognize the real phenomenon of rural employment. Some of this is genuine “smart” growth of the kind that the council ought to be promoting, and states that they are keen to encourage. Faster broadband, where it exists, is a genuinely useful tool which allows remote working for the highly educated populace. The University of Surrey generates a significant proportion of this highly skilled group. It also boasts about the highly skilled external population and the high calibre of local residents in its publicity material. The Surrey Hills AONB is proud to be classified by government as an “Elite Employment Enclave” where a high proportion of around 40% of households include a company director; such groups can often work flexibly. However, too much industrialization, commercialization and physical building in a rural environment will result in a change in the environment that attracts these flexible and affluent members of the community, and would result in these same groups moving to a more desirable and pleasant location. This would have a negative impact on the local economy. This consideration, while noted in public meetings in relation to the Surrey Hills by the Surrey Hills AONB board, has a general application to the borough as a whole.
In addition to smart-working among an educated group, and its economic upside, there is the fact that the rural area is founded on an agricultural framework that has persisted for two thousand years and is a viable, successful and profitable series of businesses. The land on which GBC proposes to build is viable and profitable agricultural land which supports existing businesses. Some of these are simple farms, producing food which our country needs. This should not be underestimated. The University of Cambridge has noted a significant decline in the UK’s food security or ability to feed itself – a significant factor in an era of increased climate change and global insecurity. This report, produced in conjunction with a number of other groups including CLA (Country Landowners’ Association), NFU (National Farmers’ Union), Sainsbury’s, Asda and Nestlé noted that the UK would require up to 7 million hectares more agricultural land to meet the country’s needs for food by 2030, roughly the period covered by the plan. To replace valuable and necessary agricultural land with storage depots or warehouses which will make the environment unpleasant for residents, destroy viable agricultural businesses, and that are likely to remain empty and unprofitable unless they undercut existing viable depots elsewhere, seems to benefit only those who build the depots.

While there is ostensible recognition of the importance of agriculture, this is subverted by suggesting that the provision of new and larger buildings is essential to agriculture and forestry. We would dispute this contention.

In addition to the essential business of food production, an increasing number of our farmers are engaged in high added value food processing and delivery, which is also an extremely profitable business and of growing local interest. This does not, however, necessitate large scale building. The Surrey Hills label is helpful in this regard, as is noted in the context of the policy. Silent Pool gin and sparkling wine, The Tillingbourne Trout Farm, the Kingfisher Watercress beds, the raising of beef, lamb, pork, and poultry in the Surrey Hills at Drydown Farm or Manor Farm; the Hog’s Back brewery, fruit grown throughout the borough and many other businesses are of enormous significance to the borough and should be encouraged. It will be harder to cultivate a label advertising premium quality organic food from the North Downs if Guildford becomes known principally as a storage or warehousing area.

Economic growth is indeed needed by the country. Some of that growth is perhaps needed in Surrey, although we already produce a disproportionate share of the national wealth and are the most densely populated rural county. Many would argue that this is not an appropriate destination for economic pump-priming and that areas which have more need of employment, (for example in the Black Country, the North West, the North East or Wales) would be better recipients of public finance to encourage economic growth. We don’t particularly want it; we don’t particularly need it; and we are trying to cope with the organic growth we have, we certainly don’t need to stimulate it further. The unelected and undemocratic M3LEP has a stated agenda, evidenced by its minutes (subsequently expurgated), of actively influencing government policy in relation to housebuilding; and this is perhaps because housebuilders sit on the Land and Property Group of the M3 LEP. This constitutes an unacceptable conflict of interest.

The ability to generate wealth is not related to the size or number of warehouses built. This is unintelligent and old thinking – wealth is not related to the size of storage space. The monitoring of sq m of B class floorspace completed in rural wards is entirely inappropriate.

The Key Evidence summary notes that the evidence base includes the Guildford Borough Rural Economic Strategy which is yet to be published and therefore (by definition) cannot have informed this policy or the decisions which have been taken in order to arrive at it. To determine a policy on the basis of a non-existent evidence base, which is only provided (or indeed drafted) post hoc, must be legally indefensible.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. POLICY E5

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5044  Respondent: 8667713 / Victoria Sinnett  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY E5

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1406  Respondent: 8671969 / Valerie Thompson  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

E5 Rural Economy

I object to the fact that localism is being ignored.

Villages need to be protected from inappropriate development, not swamped with semi-urban housing estates as GBC proposes.
The Rural character of many villages will be lost; especially West Horsley.

The building of the new Theatre in the Woods (Opera House) and the accompanying Arts Centre in the adjoining barns and outbuildings at West Horsley Place, will rely for its success on bringing tourists and visitors from far and wide, who will not appreciate its position in a village full of ticky-tacky, over-dense housing estates

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1089  Respondent: 8687041 / Michael Aaronson  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I much welcome the new statement in this Policy (para 3) that "Agricultural land will be protected as set out in national policy and the economic and other benefits of the best and most versatile agricultural land will be taken into account." Previous versions of the Plan have not sufficiently acknowledged the importance of agriculture in an age when the UK needs to become more self-sufficient in food production and reduce the harmful environmental effects of 'food miles'.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1078  Respondent: 8687265 / Dagero Ltd (David Roberts)  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY E5 - Rural economy

I OBJECT. Use of rural areas for town centre uses without applying the sequential approach is against the principles of localism that require local people to be consulted and heeded, not ignored. Villages need protecting in terms of both design and scale.

Most of the economic activities listed in 4.4.44 depend on maintaining the rural character of our villages which would be endangered by the wholesale “insetting”, boundary expansion and house building proposed in other parts of the plan. This applies also to new and projected enterprises in the Green Belt (e.g. Grange Park Opera’s Theatre in the Woods in West Horsley, which requires a protected, rustic setting to be a success, not housing estates and congested roads). Policy E5 is incompatible with the high housing numbers proposed.

Previous commitments to improved high-speed broadband and mobile phone coverage have now been diluted, despite general support. This disregards the responses from the 2014 public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/2629  Respondent: 8693153 / Vicki Willetts  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY E5 (RURAL ECONOMY): • Incompatible with high housing numbers proposed for rural areas elsewhere in the plan. • Insetting and settlement boundary extension endanger appropriate rural activities listed that depend on maintaining rural areas’ character. • Town-centre uses for rural areas contradict government’s localism policy and need to consult and protect village environments. • Established commitments to high-speed rural broadband and mobile coverage watered down despite 2014 consultation responses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4500  Respondent: 8709249 / Geoff Spink  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY E5

I OBJECT to the loss of rural employment (Policy E5)

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4729  Respondent: 8711841 / Rosmarie Roberts-Kunz  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY E5 (RURAL ECONOMY):

• Incompatible with high housing numbers proposed for rural areas elsewhere in the plan.
• Insetting and settlement boundary extension would endanger appropriate rural activities listed that depend on maintaining rural areas’ character.
• Town-centre uses for rural areas contradict government’s localism policy and need to consult and protect village environments.
• Established commitments to high-speed rural broadband and mobile coverage watered down despite 2014 consultation responses.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11634  Respondent: 8721857 / Andrea Lightfoot  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Villages need protecting in terms of both design and scale. Many farms are being taken over by light industrial units that can be inappropriate for the area this needs to be clearly defined.

Some rural economy dependd on maintaining the rural character of our villages which would be endangered by the wholesale “insetting”, boundary expansion and house building proposed in other parts of the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9063  Respondent: 8723809 / Sally Blake  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to POLICY E5 - Rural economy

• Incompatible with high housing numbers proposed for rural areas elsewhere in the plan.
• Insetting and settlement boundary extension endanger appropriate rural activities listed that depend on maintaining rural areas’ character.
• Town-centre uses for rural areas contradict government’s localism policy and need to consult and protect village environments.
• Established commitments to high-speed rural broadband and mobile coverage watered down despite 2014 consultation responses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3228  Respondent: 8726529 / Eric Palmer  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY E5

I OBJECT to the loss of rural employment (Policy E5)
Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/3500  **Respondent:** 8726529 / Eric Palmer  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/16897  **Respondent:** 8728865 / Neville Bryan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Object

This policy should only apply to small-scale development in rural areas i.e. less than 100 sq m which is in keeping with and the permanence and amenity of the green belt. The policy needs to protect villages from overdevelopment and include good design, especially in light of insetting proposals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp171/2063  **Respondent:** 8729217 / Karen Stevens  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I support the addition of policy E5 (3), which states that “Agricultural land will be protected as set out in national policy and the economic and other benefits of the best and most versatile agricultural land will be taken into account.” However, this policy has not been applied in the Plan, and the true extent of agricultural land classifications 2 and 3a has not been accurately disclosed.

Blackwell Farm (policy A26) has both land classifications 2 and 3a (Figure 8) and yet there is no mention of its existence or extent in the Plan or accompanying evidence base. Furthermore, the site assessment criteria devised for agricultural land assessment do not mirror NPPF definitions of best and most versatile land and in their current form and application to sites do not reflect the true proportion of each grade within sites. It is unsound to present inaccurate and misleading information in documentation released for public consultation.

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)

Comment ID: PSLPP16/6702  Respondent: 8731649 / Ian Slater  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY E5

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13924  Respondent: 8732993 / Michael Weber  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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: PSLPP16/15803  Respondent: 8732993 / Michael Weber  Agent:

- **Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

### Comment ID: PSLPP16/12937  Respondent: 8735873 / David and Gillian Allan  Agent:

- **Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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: PSLPP16/3916  Respondent: 8744161 / Michael Bridge  Agent:

- **Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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: PSLPP16/3938  Respondent: 8744257 / Mary E Bridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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: PSLPP16/9291  Respondent: 8744417 / Mark & Gillie Hammersley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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: PSLPP16/12305  Respondent: 8749473 / Charlotte Beckett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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:
**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5**

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

### 7.1 OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID: PSLPP16/4890  Respondent: 8771233 / Ranald Mackinnon  Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5**

**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: PSLPP16/5585  Respondent: 8771265 / H C MacKinnon  Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5**

**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: PSLPP16/16694  Respondent: 8772801 / David French  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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: PSLPP16/6408  Respondent: 8773953 / Robin Garnett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Any business development in rural areas must be limited to businesses with maximum 100 m2 floor space such as high tech businesses and be confined within the current village boundaries. High speed broadband should be made available to these sites. It is important to continue to support all forms of agricultural business.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17025  Respondent: 8787969 / K Britton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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: PSLPP16/16497  Respondent: 8794753 / Andrew Beckett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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: PSLPP16/2977  Respondent: 8796673 / Suzanne Burroughs  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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: PSLPP16/7562  Respondent: 8798849 / David Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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: PSLPP16/2734  Respondent: 8798881 / H L 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 the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12747  Respondent: 8800545 / Bill Taylor  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick's Arch (A43) would result in the loss of existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises,

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2363  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 E5 - Rural economy
I OBJECT. Use of rural areas for town centre uses without applying the sequential approach is against the principles of localism that require local people to be consulted and heeded, not ignored. Villages need protecting in terms of both design and scale.

Most of the economic activities listed in 4.4.44 depend on maintaining the rural character of our villages which would be endangered by the wholesale “inserting”, boundary expansion and house building proposed in other parts of the plan. This applies also to new and projected enterprises in the Green Belt (e.g. Grange Park Opera’s Theatre in the Woods in West Horsley, which requires a protected, rustic setting to be a success, not housing estates and congested roads). Policy E5 is incompatible with the high housing numbers proposed.

Previous commitments to improved high-speed broadband and mobile phone coverage have now been diluted, despite general support. This disregards the responses from the 2014 public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5274  Respondent: 8810113 / Louise Stewart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY E5

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

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Attached documents:

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Comment ID: PSLPP16/16540  Respondent: 8810849 / Charles Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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<th>Comment ID: PSLPP16/16647  Respondent: 8810849 / Charles Lee  Agent:</th>
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Attached documents:

Comment ID: PSLPP16/6129  Respondent: 8817953 / Sheena Ewen  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16441  Respondent: 8818625 / Beth and Frank Fuller  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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: PSLPP16/13228  Respondent: 8820353 / Gillian Beaton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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Policy E5 goes on to state that ‘in order to support economic growth in rural areas, which will create jobs and prosperity, a positive approach to sustainable new development will be taken in Guildford borough’. I agree with this statement, but this is an inherent inconsistency in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

POLICY E5
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<th>Comment ID: PSLPP16/4570</th>
<th>Respondent: 8827777 / Mary English</th>
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Attached documents:

| Comment ID: PSLPP16/11099 | Respondent: 8828545 / Anjali Mittal | Agent: |
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

6. I Object to the omission of any qualification at the end of Policy E5 - Rural Economy that small scale rural offices and small scale rural development should accord with other policies in the plan. The supporting text to the policy should include reference to rural employment development only being acceptable where:

- it would support local community facilities or,
- it would assist the wellbeing of local communities or
- it would support the continued viability of the agricultural landscape, and
- where unacceptable additional traffic on unsuitable rural lanes would not be generated, and
- the landscape and scenic beauty of the AONB would be respected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

7. Objection 6 - AONB/AGLV rural economy considerations:

Surrey Hills AONB Management Plan 2014-2019 Policy LU4 includes development assisting the economic and social well being of residents. It reads as follows:

“Policy LU4 - Proposals that would assist in the continuation of direct agricultural and forestry businesses or benefit the social and economic well being of residents, including small scale affordable housing, will be supported, providing they do not conflict with the aim of conserving and enhancing the natural beauty of the landscape.”

The last sentence in Policy E5 – Rural Economy states without any qualification “the sequential approach will not be applied to applications for small scale rural offices or other small scale rural development.”
Just as the first bullet point in the policy includes a qualification so it is asked that the words “provided they accord with other policies in the plan” be added to this last sentence.

It will be for the Council and Inspector to consider the approach to be taken to development associated with the rural economy outside the AONB/AGLV. However, a section along the following lines would be applicable to the AONB/AGLV and could be adapted to take into account other rural areas as well. Consequently, the supporting text to Local Plan Policy E5 on the Rural Economy should include the following.

“In considering whether employment generating development might assist the rural economy in the AONB/AGLV account will be given to the degree to which the development would contribute towards supporting local community facilities and the continued viability of the agricultural landscape. New employment not assisting the well being of local communities but generating jobs likely to be occupied by those needing to commute by private car and along unsuitable rural lanes, will be avoided. Employment generating development that would not conserve landscape and scenic beauty will not 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: PSLPP16/15771  Respondent: 8836129 / Roger Shapley  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

This policy should only apply to small-scale development in rural areas in developments of less than 100 sq m (gross) which is in keeping with and the permanence and amenity of the Green Belt

Use of rural areas for town centre uses without applying the sequential approach is against the principles of localism which mean that local people should be consulted. Villages need protecting both in terms of design and in terms of scale.

Previous commitments to improved high-speed broadband and mobile phone coverage have now been diluted, despite general support. This is disregarding the responses from the previous consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7085  Respondent: 8837313 / Maria Baker  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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I Object to the loss of rural employment (Policy E5) Policy ES supports the retention and development of local Services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to policy E5 Rural Economy.

In my opinion this policy should only apply to small-scale development in rural areas which means development of less than 100 sq m (gross) which is in keeping with and the permanence and amenity of the green belt.

Use of rural areas for town centre uses without applying the sequential approach is against the principles of localism that require local people to be consulted and heeded, not ignored. Villages need protecting in terms of both design and scale and character.

Previous commitments to improved high-speed broadband and mobile phone coverage have now been diluted, despite general support. This disregards the responses from the 2014 public consultation.

The consultation process was not well publicized; many Parish Councils had no idea of this. The emphasis on voluntary efforts and greater community efforts is far removed from reality for this ‘solution’ was presented for almost every aspect of rural life from managing crime to looking after elderly to education and more besides. Villages by nature are usually small and the percentage of the population who are able to do voluntary work is smaller still. The solution is therefore unworkable. The results of the consultation were not publicized but were instead collated and summarized and bore no resemblance to the submissions I had sight of.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

POLICY E5

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Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. I object to the loss of rural employment opportunities that will occur following the identification of commercial space for housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to E5 to the extent that it includes 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?

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I object to policy E5 Rural Economy. In my opinion this policy should only apply to small-scale development in rural areas which means development of less than 100 sq m (gross) which is in keeping with and the permanence and amenity of the green belt. Use of rural areas for town centre uses without applying the sequential approach is against the principles of localism that require local people to be consulted and heeded, not ignored. Villages need protecting in terms of both design and scale. Policy E5 is incompatible with the high housing numbers proposed.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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### Comment ID: PSLPP16/8186  Respondent: 8845121 / Sue Darling  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Re Policy E5, I object to the failure of E5 and para 4.4.51 to specify establishment of fibre broadband 'at minimum acceptable speeds.' Fibre broadband of itself is not necessarily superfast, particularly in the rural areas which this policy aims to reach.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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### Comment ID: PSLPP16/17919  Respondent: 8845121 / Sue Darling  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

2. Re Policy E5, I object to the failure of E5 and para 4.4.51 to specify establishment of fibre broadband ’at minimum acceptable speeds. ’ Fibre broadband of itself is not necessarily superfast, particularly in the rural areas which this policy aims to reach.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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### Comment ID: PSLPP16/10596  Respondent: 8855969 / Jonathan Murphy  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Use of rural areas for town centre uses without applying the sequential approach is against the principles of localism which mean that local people should be consulted – and heeded (not ignored!). Villages need protecting both in terms of design and in terms of scale.

Previous commitments to improved high-speed broadband and mobile phone coverage have now been diluted, despite general support. This is disregarding the responses from the previous consultation.

It should be noted that the NPPF “provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans which reflect the needs and priorities of their communities.” (NPPF 1).

Guildford becoming a Growth Hub was NOT in the election manifesto. This policy was mentioned only tangentially in the corporate plan. Given Guildford’s poor transport links, noted congestion and the problems that this is perceived to cause for existing businesses, this does not seem an appropriate decision.

This radical, unsupported policy change is apparently in order to generate "growth" - although the possibility is that too much building over the areas that make Guildford Borough attractive will actually generate damage and stagnation, and cause a net decline in local affluence and growth. This risk has been highlighted by some local business leaders in the press.

In addition to NPPF 1, the Core Planning Principles set out in NPPF 17 include, as the FIRST (and therefore most important) principle, that “planning should:

- Be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area”.

Furthermore, if this were not enough, in the section on Plan-making, NPPF 155 states:

“Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. [It is not clear that early collaboration with prospective developers is either required or legal]. A wide section of the community should be proactively engaged so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made”.

Local People are supposed to be represented within the NPPF, and any plan which does not meet with the consent of local people is arguably unsound. The failure to amend a plan following consultation, and to take the points made into account, is arguably in breach of NPPF and is therefore at risk of consequential challenge. A policy that is unsupported by the local community should be considered to be unsound.

It is arguable that GBC is arguing aggressively for a pro-development strategy in relation to villages and the Green Belt and mis-stating national policy as a result.

Many of the proposed “main town centre” uses would not be appropriate either to the Green Belt or villages within it - indoor bowling, casinos, warehouses etc. would not be appropriate for most villages in Surrey.
The provision and take up of reliable and high speed broadband, and the increased impact of home working and smart working are welcomed. Access to high speed broadband as a priority is welcomed and this is one of few aspects of the LEP’s policy that is welcomed in relation to the rural environment.

In this context, it seems entirely inappropriate that a monitoring indicator is net additional employment floorspace completed by category. “Smart” and home-working do not involve incremental floorspace and to evaluate incremental economic growth by the size of floorspace allocated is an inappropriate measure in the Green Belt. By definition such work uses do not require space. It is important to recognize – as this Local Plan does not – that the main employment within the countryside is related to that countryside, whether due to agriculture, tourism (so that “unproductive” or open space land has a positive economic impact too), film, or ancillary activities related to the above, and that to reduce the countryside footprint by building sites is to reduce economic land. The only use of land that has no ongoing positive impact for the community is to use it as a building site, whereupon it is lost in terms of ongoing economic benefit to all except the future owners.

NPPF 17 requires that local authorities “always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings”, and that they “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, recognizing the intrinsic character and beauty of the countryside and supporting thriving communities within it”. To appraise building within the Green Belt merely in terms of numbers of buildings or net additional floorspace does not meet the requirements of those principles.

The rural areas currently have a vibrant and strong economy, and building should not be regarded as a major objective. Existing agriculture, food production, tourism and film industries rely on our existing countryside, and to substitute these by building warehouses, commercial space or even processing space for ancillary agricultural processing will be to damage the environment for no economic gain. The loss of agricultural land is to be avoided; food security is an increasingly important factor in a congested island with an increasingly population based in the temperate zone so that it can supply food without climate stress; as noted by Cambridge University we will need more food producing land, not less, over the next few decades (see study attached to previous submission, disregarded).

Villages should be protected; new building in villages should be within the existing settlement boundaries, and new settlement boundaries should only reflect the historic changes of the settlement areas; building should not extend into the open countryside of the Green Belt; and new building should focus on brownfield sites within the urban areas.

We support the proposal for high speed broadband but are disappointed that the previous reference to this specifically “Provision and take-up of reliable and high speed broadband has been a major issue reported by rural businesses. Access to key services vital for economic growth is often poor in rural areas. Slow broadband and inadequate and slow mobile phone coverage are constraints to economic development” has now been modified to refer only to “provision of internet services where needed in rural areas and enhance digital inclusion in such areas”. This must be modified to read “provision of high speed internet services and reliable mobile phone coverage to all rural areas etc”. In the prior consultation, a matter that was warmly welcomed by most respondents has now been significantly weakened.

We agree that high speed broadband is a desirable attribute for the wider economy, and that this is particular lacking in the rural areas of Guildford. However, its introduction should lead to an increase in smart home-working, rather than the building of additional employment space. The policy needs to include a commitment to get superfast broadband accessible by all residents in the borough as this will provide much greater support to rural industry than anything else.

In this context, a monitoring indicator of “Number of sq m of B Class floorspace permitted and completed in rural wards” is fundamentally wrong; the indicator used for monitoring should be independent of land use, or this creates a perverse incentive to build on land. It should be related to real economic growth – for example, incremental corporation and personal tax income generated by businesses and individuals based within the borough.
Furthermore, as ever, the urban-guided planning philosophy also entirely fails to recognize the real phenomenon of rural employment. Some of this is genuine “smart” growth of the kind that the council ought to be promoting, and states that they are keen to encourage. Faster broadband, where it exists, is a genuinely useful tool which allows remote working for the highly educated populace. The University of Surrey generates a significant proportion of this highly skilled group. It also boasts about the highly skilled external population and the high calibre of local residents in its publicity material. The Surrey Hills AONB is proud to be classified as an “Elite Employment Enclave” where a high proportion of around 40% of households include a company director; such groups can often work flexibly. However, too much industrialization, commercialization and physical building in a rural environment will result in a change in the environment that attracts these flexible and affluent members of the community, and would result in these same groups moving to a more desirable and pleasant location. This would have a negative impact on the local economy. This consideration, while noted in public meetings in relation to the Surrey Hills by the Surrey Hills AONB board, has a general application to the borough as a whole.

In addition to the essential business of food production, an increasing number of our farmers are engaged in high added value food processing and delivery, which is also an extremely profitable business and of growing local interest. This is particularly true for the production of premium quality organic food. Some of these are simple farms, producing food which our country needs. This should not be underestimated. The University of Cambridge has noted a significant decline in the UK’s food security or ability to feed itself – a significant factor in an era of increased climate change and global insecurity. This report, produced in conjunction with a number of other groups including CLA (Country Landowners’ Association), NFU (National Farmers’ Union), Sainsbury’s, Asda and Nestlé noted that the UK would require up to 7 million hectares more agricultural land to meet the country’s needs for food by 2030, roughly the period covered by the plan. To replace valuable and necessary agricultural land with storage depots or warehouses which will make the environment unpleasant for residents, destroy viable agricultural businesses, and that are likely to remain empty and unprofitable unless they undercut existing viable depots elsewhere, seems to benefit only those who build the depots.

While there is ostensible recognition of the importance of agriculture, this is subverted by suggesting that the provision of new and larger buildings is essential to agriculture and forestry. We would dispute this contention.

In addition to smart-working among an educated group, and its economic upside, there is the fact that the rural area is founded on an agricultural framework that has persisted for two thousand years and is a viable, successful and profitable series of businesses. The land on which GBC proposes to build is viable and profitable agricultural land which supports existing businesses. Some of these are simple farms, producing food which our country needs. This should not be underestimated. The University of Cambridge has noted a significant decline in the UK’s food security or ability to feed itself – a significant factor in an era of increased climate change and global insecurity. This report, produced in conjunction with a number of other groups including CLA (Country Landowners’ Association), NFU (National Farmers’ Union), Sainsbury’s, Asda and Nestlé noted that the UK would require up to 7 million hectares more agricultural land to meet the country’s needs for food by 2030, roughly the period covered by the plan. To replace valuable and necessary agricultural land with storage depots or warehouses which will make the environment unpleasant for residents, destroy viable agricultural businesses, and that are likely to remain empty and unprofitable unless they undercut existing viable depots elsewhere, seems to benefit only those who build the depots.

Economic growth is indeed needed by the country. Some of that growth is perhaps needed in Surrey, although we already produce a disproportionate share of the national wealth and are the most densely populated rural county. Many would argue that this is not an appropriate destination for economic pump-priming and that areas which have more need of employment, (for example in the Black Country, the North West, the North East or Wales) would be better recipients of public finance to encourage economic growth. We don’t particularly want it; we don’t particularly need it; and we are trying to cope with the organic growth we have, we certainly don’t need to stimulate it further. The unelected and undemocratic M3LEP has a stated agenda, evidenced by its minutes (subsequently expurgated), of actively influencing government policy in relation to housebuilding; and this is perhaps because housebuilders sit on the Land and Property Group of the M3 LEP. This constitutes an unacceptable conflict of interest.

The ability to generate wealth is not related to the size or number of warehouses built. This is unintelligent and old thinking – wealth is not related to the size of storage space. The monitoring of sq m of B class floorspace completed in rural wards is entirely inappropriate.

The Key Evidence summary notes that the evidence base includes the Guildford Borough Rural Economic Strategy which is yet to be published and therefore (by definition) cannot have informed this policy or the decisions which have been taken in order to arrive at it. To determine a policy on the basis of a non-existent evidence base, which is only provided (or indeed drafted) post hoc, must be legally indefensible.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2428  Respondent: 8858433 / Eric Peters  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy E5 - Rural Economy

I object. Villages need protecting. The policy is incompatible with the high number of proposed houses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10385  Respondent: 8858881 / Stephen Meredith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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 rural employment (Policy E5). Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. However the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2225  Respondent: 8860897 / Julia Shaw  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

This policy should only apply to small-scale development in rural areas which means development of less than 100 sq m (gross) which is in keeping with and the permanence and amenity of the green belt.

Use of rural areas for town centre uses without applying the sequential approach is against the principles of localism which mean that local people should be consulted – and heeded (not ignored!). Villages need protecting both in terms of design and in terms of scale.

Previous commitments to improved high-speed broadband and mobile phone coverage have now been diluted, despite general support. This is disregarding the responses from the previous consultation.
It should be noted that the NPPF “provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans which reflect the needs and priorities of their communities.” (NPPF 1).

Guildford becoming a Growth Hub was NOT in the election manifesto. This policy was mentioned only tangentially in the corporate plan. Given Guildford’s poor transport links, noted congestion and the problems that this is perceived to cause for existing businesses, this does not seem an appropriate decision.

This radical, unsupported policy change is apparently in order to generate “growth” - although the possibility is that too much building over the areas that make Guildford Borough attractive will actually generate damage and stagnation, and cause a net decline in local affluence and growth. This risk has been highlighted by some local business leaders in the press.

In addition to NPPF 1, the Core Planning Principles set out in NPPF 17 include, as the FIRST (and therefore most important) principle, that “planning should:

- Be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area”.

Furthermore, if this were not enough, in the section on Plan-making, NPPF 155 states:

“Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. [It is not clear that early collaboration with prospective developers is either required or legal]. A wide section of the community should be proactively engaged so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made”.

Local People are supposed to be represented within the NPPF, and any plan which does not meet with the consent of local people is arguably unsound. The failure to amend a plan following consultation, and to take the points made into account, is arguably in breach of NPPF and is therefore at risk of consequential challenge. A policy that is unsupported by the local community should be considered to be unsound.

It is arguable that GBC is arguing aggressively for a pro-development strategy in relation to villages and the Green Belt and mis-stating national policy as a result.

Many of the proposed “main town centre” uses would not be appropriate either to the Green Belt or villages within it - indoor bowling, casinos, warehouses etc. would not be appropriate for most villages in Surrey.

The provision and take up of reliable and high speed broadband, and the increased impact of home working and smart working are welcomed. Access to high speed broadband as a priority is welcomed and this is one of few aspects of the LEP’s policy that is welcomed in relation to the rural environment.

In this context, it seems entirely inappropriate that a monitoring indicator is net additional employment floorspace completed by category. “Smart” and home-working do not involve incremental floorspace and to evaluate incremental economic growth by the size of floorspace allocated is an inappropriate measure in the Green Belt. By definition such work uses do not require space. It is important to recognize – as this Local Plan does not – that the main employment within the countryside is related to that countryside, whether due to agriculture, tourism (so that “unproductive” or open space land has a positive economic impact too), film, or ancillary activities related to the above, and that to reduce the countryside footprint by building sites is to reduce economic land. The only use of land that has no ongoing positive impact for the community is to use it as a building site, whereupon it is lost in terms of ongoing economic benefit to all except the future owners.

NPPF 17 requires that local authorities “always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings”, and that they “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, recognizing the
intrinsic character and beauty of the countryside and supporting thriving communities within it”. To appraise building within the Green Belt merely in terms of numbers of buildings or net additional floorspace does not meet the requirements of those principles.

The rural areas currently have a vibrant and strong economy, and building should not be regarded as a major objective. Existing agriculture, food production, tourism and film industries rely on our existing countryside, and to substitute these by building warehouses, commercial space or even processing space for ancillary agricultural processing will be to damage the environment for no economic gain. The loss of agricultural land is to be avoided; food security is an increasingly important factor in a congested island with an increasingly population based in the temperate zone so that it can supply food without climate stress; as noted by Cambridge University we will need more food producing land, not less, over the next few decades (see study attached to previous submission, disregarded).

Villages should be protected; new building in villages should be within the existing settlement boundaries, and new settlement boundaries should only reflect the historic changes of the settlement areas; building should not extend into the open countryside of the Green Belt; and new building should focus on brownfield sites within the urban areas.

I support the proposal for high speed broadband but are disappointed that the previous reference to this specifically “Provision and take-up of reliable and high speed broadband has been a major issue reported by rural businesses. Access to key services vital for economic growth is often poor in rural areas. Slow broadband and inadequate and slow mobile phone coverage are constraints to economic development” has now been modified to refer only to “provision of internet services where needed in rural areas and enhance digital inclusion in such areas”. This must be modified to read “provision of high speed internet services and reliable mobile phone coverage to all rural areas etc”. In the prior consultation, a matter that was warmly welcomed by most respondents has now been significantly weakened.

I agree that high speed broadband is a desirable attribute for the wider economy, and that this is particular lacking in the rural areas of Guildford. However, its introduction should lead to an increase in smart home-working, rather than the building of additional employment space. The policy needs to include a commitment to get super fast broadband accessible by all residents in the borough as this will provide much greater support to rural industry than anything else.

In this context, a monitoring indicator of “Number of sq m of B Class floorspace permitted and completed in rural wards” is fundamentally wrong; the indicator used for monitoring should be independent of land use, or this creates a perverse incentive to build on land. It should be related to real economic growth – for example, incremental corporation and personal tax income generated by businesses and individuals based within the borough.

Furthermore, as ever, the urban-guided planning philosophy also entirely fails to recognize the real phenomenon of rural employment. Some of this is genuine “smart” growth of the kind that the council ought to be promoting, and states that they are keen to encourage. Faster broadband, where it exists, is a genuinely useful tool which allows remote working for the highly educated populace. The University of Surrey generates a significant proportion of this highly skilled group. It also boasts about the highly skilled external population and the high calibre of local residents in its publicity material. The Surrey Hills AONB is proud to be classified by government as an “Elite Employment Enclave” where a high proportion of around 40% of households include a company director; such groups can often work flexibly. However, too much industrialization, commercialization and physical building in a rural environment will result in a change in the environment that attracts these flexible and affluent members of the community, and would result in these same groups moving to a more desirable and pleasant location. This would have a negative impact on the local economy. This consideration, while noted in public meetings in relation to the Surrey Hills by the Surrey Hills AONB board, has a general application to the borough as a whole.

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Union), Sainsbury’s, Asda and Nestlé noted that the UK would require up to 7 million hectares more agricultural land to meet the country’s needs for food by 2030, roughly the period covered by the plan. To replace valuable and necessary agricultural land with storage depots or warehouses which will make the environment unpleasant for residents, destroy viable agricultural businesses, and that are likely to remain empty and unprofitable unless they undercut existing viable depots elsewhere, seems to benefit only those who build the depots.

While there is ostensible recognition of the importance of agriculture, this is subverted by suggesting that the provision of new and larger buildings is essential to agriculture and forestry. I would dispute this contention.

In addition to the essential business of food production, an increasing number of our farmers are engaged in high added value food processing and delivery, which is also an extremely profitable business and of growing local interest. This does not, however, necessitate large scale building. The Surrey Hills label is helpful in this regard, as is noted in the context of the policy. Silent Pool gin and sparkling wine, The Tillingbourne Trout Farm, the Kingfisher Watercress beds, the raising of beef, lamb, pork, and poultry in the Surrey Hills at Drydown Farm or Manor Farm; the Hog’s Back brewery, fruit grown throughout the borough and many other businesses are of enormous significance to the borough and should be encouraged. It will be harder to cultivate a label advertising premium quality organic food from the North Downs if Guildford becomes known principally as a storage or warehousing area.

Economic growth is indeed needed by the country. Some of that growth is perhaps needed in Surrey, although we already produce a disproportionate share of the national wealth and are the most densely populated rural county. Many would argue that this is not an appropriate destination for economic pump-priming and that areas which have more need of employment, (for example in the Black Country, the North West, the North East or Wales) would be better recipients of public finance to encourage economic growth. We don’t particularly want it; we don’t particularly need it; and we are trying to cope with the organic growth we have, we certainly don’t need to stimulate it further. The unelected and undemocratic M3 LEP has a stated agenda, evidenced by its minutes (subsequently expurgated), of actively influencing government policy in relation to housebuilding; and this is perhaps because house builders sit on the Land and Property Group of the M3 LEP. This constitutes an unacceptable conflict of interest.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/11370  **Respondent:** 8865537 / P Waldner  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

**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 rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.
Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

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: PSLPP16/7158  Respondent: 8881345 / Lynne Ground  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5
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: PSLPP16/11580  Respondent: 8881537 / Jean Baptist  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5
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: PSLPP16/5747  Respondent: 8883841 / Pamela French  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

7. I OBJECT to the loss of rural employment
Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16617  Respondent: 8883841 / Pamela French  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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: PSLPP16/4589  Respondent: 8892673 / Nick Forwood  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

7. I object to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of several successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them wish to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9289  Respondent: 8892737 / David Eagle  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

### 7. POLICY E5

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID: PSLPP16/18571  Respondent: 8896161 / Carol Wilson  Agent:**

**Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to E5 to the extent that it includes 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.*

E5 is incompatible with the high housing numbers proposed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID: PSLPP16/8035  Respondent: 8899713 / Tessa Crago  Agent:**

**Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
Comment ID: PSLPP16/4253  Respondent: 8900705 / Susan Fuller  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to the loss of rural employment (Policy E5)

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4114  Respondent: 8901633 / Duncan Gray  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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: PSLPP16/8157  Respondent: 8902465 / Linda Slater  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY E5 (RURAL ECONOMY):

• Incompatible with high housing numbers proposed for rural areas elsewhere in the plan.
• Insetting and settlement boundary extension endanger appropriate rural activities listed that depend on maintaining rural areas’ character.
- Town-centre uses for rural areas contradict government’s localism policy and need to consult and protect village environments.
- Established commitments to high-speed rural broadband and mobile coverage watered down despite 2014 consultation responses.

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: PSLPP16/18524</th>
<th>Respondent: 8903265 / Susan Anderson</th>
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<th>Comment ID: PSLPP16/4188</th>
<th>Respondent: 8904673 / Colin Burnside</th>
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Comment ID: PSLPP16/18424  Respondent: 8909761 / Diana Grover  Agent:

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12069  Respondent: 8914945 / Nichola Armstrong  Agent:

I object to Policy E5. The Green Belt should not be used for town uses. Any large development is inappropriate in size and relation to rural locations. This Policy does not fit within the NPPF core principles of openness and permanence of Green Belt. It is not acceptable. What would be useful is decent broadband in rural areas so people can use it to enhance their businesses in the rural economy, however, The Plan's has opted for second best.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<th>Comment ID: PSLPP16/9454</th>
<th>Respondent: 8915073 / Alastair Lawson</th>
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Henley Business Park
The NPPF states that planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development, which includes economic, social and environmental dimensions.
See my comments above – no evidence on improvements needed to make this a viable Policy for this site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<th>Comment ID: PSLPP16/13215</th>
<th>Respondent: 8919009 / Andrew Kukielka</th>
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<th>Comment ID: PSLPP16/11984</th>
<th>Respondent: 8921377 / Paul Maycox</th>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?
The retention and development of local services and community facilities in our villages is supported by policy E5. Yet the Garlick’s Arch development (A43) would result in four existing successful rural businesses losing their premises. Rural employment is therefore not promoted by The Plan, rather it will result in the loss of existing local rural businesses.

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Attached documents:

Comment ID: PSLPP16/15148  Respondent: 8926529 / Annie Cross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy E5 - Rural Economy

I object to increasing the rural economy to accommodate large, unsustainable, dormitory towns, i.e. Gosden Hill, former Wisley Airfield, Blackwell Farm.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11709  Respondent: 8928033 / P. Richardson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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Attached documents:

Comment ID: PSLPP16/11932  Respondent: 8928289 / Trevor Skerritt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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Page 85, 4.4.44, Policy E5: Rural Economy

and wide range: and a wide range

Page 86 Policy E5: Rural Economy

(5) outside of: outside

Attached documents:

Comment ID: pslp171/817  Respondent: 8933537 / Annie Ladd  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E5

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Attached documents:

Comment ID: PSLPP16/16049  Respondent: 8941761 / FLGCA (Paul Kassell)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We support this policy on the condition that protection from inappropriate development, maintenance of character and style as well as preservation of green spaces within inset villages should be better provided by policies D4 and I5

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2735  Respondent: 8944929 / A Jefferies  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
25. I object to the wording of para 5 in policy E5 – “marketing of the site for its current use for a minimum of 12 prior to submission of a planning application”. This is another example of extremely poor and careless drafting. DO you mean 12 days, months, years….

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9376  Respondent: 8948385 / Gillian Eve  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT. This policy should only apply to small-scale development in rural areas, in keeping with and the permanence and amenity of the green belt.

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Attached documents:

Comment ID: PSLPP16/16163  Respondent: 8948385 / Gillian Eve  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5
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Comment ID: PSLPP16/11452  Respondent: 9062913 / Susan Parker  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY E5 Rural economy

OBJECT Use of rural areas for town centre uses without applying the sequential approach is against the principles of localism which mean that local people should be consulted – and heeded (not ignored!). Villages need protecting both in terms of design and in terms of scale.

Previous commitments to improved high-speed broadband and mobile phone coverage have now been diluted, despite general support. This is disregarding the responses from the previous consultation.

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<th>Comment ID: PSLPP16/7017</th>
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<th>Comment ID: PSLPP16/10644</th>
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**Policy E5: Rural Economy**

I OBJECT to the unfettered opportunity to bring town centre uses into the rural areas. Some may be perfectly acceptable, but others definitely will not. It should be possible to re-draft this policy more specifically in terms of (a) the uses that are allowed (and those that are not), and (b) the particular locations where allowable uses might be permitted. Finally, there should be safeguards so that residents’ views are fully taken into account if such uses are proposed in rural areas.

Redrafting of this nature is required before residents can pass sensible judgement on this policy.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<th>Comment ID: PSLPP16/6335</th>
<th>Respondent: 9607905 / Anne Pascoe</th>
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Comment ID: PSLPP16/12670  Respondent: 10619169 / Wendy Critchlow  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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Comment ID: PSLPP16/8226  Respondent: 10662849 / Garry Walton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document: complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY E5 - Rural economy

I OBJECT. Use of rural areas for town centre uses without applying the sequential approach is against the principles of localism that require local people to be consulted and heeded, not ignored. Villages need protecting in terms of both design and scale.

Most of the economic activities listed in 4.4.44 depend on maintaining the rural character of our villages which would be endangered by the wholesale “insetting”, boundary expansion and house building proposed in other parts of the plan. This applies also to new and projected enterprises in the Green Belt (e.g. Grange Park Opera’s Theatre in the Woods in West Horsley, which requires a protected, rustic setting to be a success, not housing estates and congested roads). Policy E5 is incompatible with the high housing numbers proposed.

Previous commitments to improved high-speed broadband and mobile phone coverage have now been diluted, despite general support. This disregards the responses from the 2014 public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
7. I OBJECT to the loss of rural employment (Policy ES)

Policy ES supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick's Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

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 loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

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:** PSLPP16/3843  **Respondent:** 10702561 / Emily Gamble  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

6. I object to the loss of rural employment

The plan will result in the loss of rural businesses and their dozens of employees by forcing them out of their premises against their will. Some of these businesses have been operating and providing employment for 30 years. This is a travesty.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/17911  **Respondent:** 10722049 / Richard Smith  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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:** PSLPP16/14785  **Respondent:** 10735777 / S. May  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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POLICY E5 Rural economy

OBJECT Use of rural areas for town centre uses without applying the sequential approach is against the principles of localism which mean that local people should be consulted – and heeded (not ignored!). Villages need protecting both in terms of design and in terms of scale.

Previous commitments to improved high-speed broadband and mobile phone coverage have now been diluted, despite general support. This is disregarding the responses from the previous consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18382  Respondent: 10799169 / Neal Basson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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Previous commitments to improved high-speed broadband and mobile phone coverage have now been diluted, despite general support. This is disregarding the responses from the previous consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPP16/17533  Respondent: 10799425 / Guildford Greenbelt Group (Susan Parker)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document: complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We object to policy E5 Rural Economy

This policy should only apply to small-scale development in rural areas which means development of less than 100 sq m (gross) which is in keeping with and the permanence and amenity of the green belt.

Use of rural areas for town centre uses without applying the sequential approach is against the principles of localism which mean that local people should be consulted – and heeded (not ignored!). Villages need protecting both in terms of design and in terms of scale.
Previous commitments to improved high-speed broadband and mobile phone coverage have now been diluted, despite
general support. This is disregarding the responses from the previous consultation.

It should be noted that the NPPF “provides a framework within which local people and their accountable councils can
produce their own distinctive local and neighbourhood plans which reflect the needs and priorities of their communities.”
(NPPF 1).

Guildford becoming a Growth Hub was NOT in the election manifesto. This policy was mentioned only tangentially in
the corporate plan. Given Guildford’s poor transport links, noted congestion and the problems that this is perceived to
cause for existing businesses, this does not seem an appropriate decision.

This radical, unsupported policy change is apparently in order to generate “growth” - although the possibility is that too
much building over the areas that make Guildford Borough attractive will actually generate damage and stagnation, and
cause a net decline in local affluence and growth. This risk has been highlighted by some local business leaders in the
press.

In addition to NPPF 1, the Core Planning Principles set out in NPPF 17 include, as the FIRST (and therefore most
important) principle, that “planning should:

• Be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and
  neighbourhood plans setting out a positive vision for the future of the area”.

Furthermore, if this were not enough, in the section on Plan-making, NPPF 155 states:

“Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is
essential. [It is not clear that early collaboration with prospective developers is either required or legal]. A wide section
of the community should be proactively engaged so that Local Plans, as far as possible, reflect a collective vision and a
set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood
plans that have been made”.

Local People are supposed to be represented within the NPPF, and any plan which does not meet with the consent of local
people is arguably unsound. The failure to amend a plan following consultation, and to take the points made into account,
is arguably in breach of NPPF and is therefore at risk of consequential challenge. A policy that is unsupported by the
local community should be considered to be unsound.

It is arguable that GBC is arguing aggressively for a pro-development strategy in relation to villages and the Green Belt
and mis-stating national policy as a result.

Many of the proposed “main town centre” uses would not be appropriate either to the Green Belt or villages within it - indoor
bowling, casinos, warehouses etc. would not be appropriate for most villages in Surrey.

The provision and take up of reliable and high speed broadband, and the increased impact of home working and smart
working are welcomed. Access to high speed broadband as a priority is welcomed and this is one of few aspects of the
LEP’s policy that is welcomed in relation to the rural environment.

In this context, it seems entirely inappropriate that a monitoring indicator is net additional
employment floorspace completed by category. “Smart” and home-working do not involve incremental floorspace and
to evaluate incremental economic growth by the size of floorspace allocated is an inappropriate measure in the Green
Belt. By definition such work uses do not require space. It is important to recognize – as this Local Plan does not – that
the main employment within the countryside is related to that countryside, whether due to agriculture, tourism (so that
“unproductive” or open space land has a positive economic impact too), film, or ancillary activities related to the above,
and that to reduce the countryside footprint by building sites is to reduce economic land. The only use of land that has no
ongoing positive impact for the community is to use it as a building site, whereupon it is lost in terms of ongoing
economic benefit to all except the future owners.

NPPF 17 requires that local authorities “always seek to secure high quality design and a good standard of amenity for all
existing and future occupants of land and buildings”, and that they “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, recognizing the intrinsic character and beauty of the countryside and supporting thriving communities within it”. To appraise building within the Green Belt merely in terms of numbers of buildings or net additional floorspace does not meet the requirements of those principles.

The rural areas currently have a vibrant and strong economy, and building should not be regarded as a major objective. Existing agriculture, food production, tourism and film industries rely on our existing countryside, and to substitute these by building warehouses, commercial space or even processing space for ancillary agricultural processing will be to damage the environment for no economic gain. The loss of agricultural land is to be avoided; food security is an increasingly important factor in a congested island with an increasingly population based in the temperate zone so that it can supply food without climate stress; as noted by Cambridge University we will need more food producing land, not less, over the next few decades (see study attached to previous submission, disregarded).

Villages should be protected; new building in villages should be within the existing settlement boundaries, and new settlement boundaries should only reflect the historic changes of the settlement areas; building should not extend into the open countryside of the Green Belt; and new building should focus on brownfield sites within the urban areas.

We support the proposal for high speed broadband but are disappointed that the previous reference to this specifically “Provision and take-up of reliable and high speed broadband has been a major issue reported by rural businesses. Access to key services vital for economic growth is often poor in rural areas. Slow broadband and inadequate and slow mobile phone coverage are constraints to economic development” has now been modified to refer only to “provision of internet services where needed in rural areas and enhance digital inclusion in such areas”. This must be modified to read “provision of high speed internet services and reliable mobile phone coverage to all rural areas etc”. In the prior consultation, a matter that was warmly welcomed by most respondents has now been significantly weakened.

We agree that high speed broadband is a desirable attribute for the wider economy, and that this is particular lacking in the rural areas of Guildford. However, its introduction should lead to an increase in smart home-working, rather than the building of additional employment space. The policy needs to include a commitment to get superfast broadband accessible by all residents in the borough as this will provide much greater support to rural industry than anything else.

In this context, a monitoring indicator of “Number of sq m of B Class floorspace permitted and completed in rural wards” is fundamentally wrong; the indicator used for monitoring should be independent of land use, or this creates a perverse incentive to build on land. It should be related to real economic growth – for example, incremental corporation and personal tax income generated by businesses and individuals based within the borough.

Furthermore, as ever, the urban-guided planning philosophy also entirely fails to recognize the real phenomenon of rural employment. Some of this is genuine “smart” growth of the kind that the council ought to be promoting, and states that they are keen to encourage. Faster broadband, where it exists, is a genuinely useful tool which allows remote working for the highly educated populace. The University of Surrey generates a significant proportion of this highly skilled group. It also boasts about the highly skilled external population and the high calibre of local residents in its publicity material. The Surrey Hills AONB is proud to be classified by government as an “Elite Employment Enclave” where a high proportion of around 40% of households include a company director; such groups can often work flexibly. However, too much industrialization, commercialization and physical building in a rural environment will result in a change in the environment that attracts these flexible and affluent members of the community, and would result in these same groups moving to a more desirable and pleasant location. This would have a negative impact on the local economy. This consideration, while noted in public meetings in relation to the Surrey Hills by the Surrey Hills AONB board, has a general application to the borough as a whole.

In addition to smart-working among an educated group, and its economic upside, there is the fact that the rural area is founded on an agricultural framework that has persisted for two thousand years and is a viable, successful and profitable series of businesses. The land on which GBC proposes to build is viable and profitable agricultural land which supports existing businesses. Some of these are simple farms, producing food which our country needs. This should not be
underestimated. The University of Cambridge has noted a significant decline in the UK’s food security or ability to feed itself – a significant factor in an era of increased climate change and global insecurity. This report, produced in conjunction with a number of other groups including CLA (Country Landowners’ Association), NFU (National Farmers’ Union), Sainsbury’s, Asda and Nestlē noted that the UK would require up to 7million hectares more agricultural land to meet the country’s needs for food by 2030, roughly the period covered by the plan. To replace valuable and necessary agricultural land with storage depots or warehouses which will make the environment unpleasant for residents, destroy viable agricultural businesses, and that are likely to remain empty and unprofitable unless they undercut existing viable depots elsewhere, seems to benefit only those who build the depots.

While there is ostensible recognition of the importance of agriculture, this is subverted by suggesting that the provision of new and larger buildings is essential to agriculture and forestry. We would dispute this contention.

In addition to the essential business of food production, an increasing number of our farmers are engaged in high added value food processing and delivery, which is also an extremely profitable business and of growing local interest. This does not, however, necessitate large scale building. The Surrey Hills label is helpful in this regard, as is noted in the context of the policy. Silent Pool gin and sparkling wine, The Tillingbourne Trout Farm, the Kingfisher Watercress beds, the raising of beef, lamb, pork, and poultry in the Surrey Hills at Drydown Farm or Manor Farm; the Hog’s Back brewery, fruit grown throughout the borough and many other businesses are of enormous significance to the borough and should be encouraged. It will be harder to cultivate a label advertising premium quality organic food from the North Downs if Guildford becomes known principally as a storage or warehousing area.

Economic growth is indeed needed by the country. Some of that growth is perhaps needed in Surrey, although we already produce a disproportionate share of the national wealth and are the most densely populated rural county. Many would argue that this is not an appropriate destination for economic pump-priming and that areas which have more need of employment, (for example in the Black Country, the North West, the North East or Wales) would be better recipients of public finance to encourage economic growth. We don’t particularly want it; we don’t particularly need it; and we are trying to cope with the organic growth we have, we certainly don’t need to stimulate it further. The unelected and undemocratic M3LEP has a stated agenda, evidenced by its minutes (subsequently expurgated), of actively influencing government policy in relation to housebuilding; and this is perhaps because housebuilders sit on the Land and Property Group of the M3 LEP. This constitutes an unacceptable conflict of interest.

The ability to generate wealth is not related to the size or number of warehouses built. This is unintelligent and old thinking – wealth is not related to the size of storage space. The monitoring of sq m of B class floorspace completed in rural wards is entirely inappropriate.

The Key Evidence summary notes that the evidence base includes the Guildford Borough Rural Economic Strategy which is yet to be published and therefore (by definition) cannot have informed this policy or the decisions which have been taken in order to arrive at it. To determine a policy on the basis of a non-existent evidence base, which is only provided (or indeed drafted) post hoc, must be legally indefensible.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
OBJECTION Use of rural areas for town centre uses without applying the sequential approach is against the principles of localism which mean that local people should be consulted – and heeded (not ignored!). Villages need protecting both in terms of design and in terms of scale.

Previous commitments to improved high-speed broadband and mobile phone coverage have now been diluted, despite general support. This is disregarding the responses from the previous consultation.

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: PSLPP16/11049</th>
<th>Respondent: 10809377 / Bernice Williams</th>
<th>Agent:</th>
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1. POLICY E5

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of localservices and community facilities in our inset and identified villages. Yet the development at Garlick's Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

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<tr>
<th>Comment ID: PSLPP16/11893</th>
<th>Respondent: 10811361 / Simon Crago</th>
<th>Agent:</th>
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Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages, yet the development at Garlick’s Arch (A43) would result in the loss of some existing successful rural businesses, which have been in existence for many years. These businesses employ dozens of people. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

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Attached documents:

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<th>Comment ID: PSLPP16/12208</th>
<th>Respondent: 10816993 / Jane Roberts</th>
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<td>Comment ID: PSLPP16/13942</td>
<td>Respondent: 10822913 / Karen Dougherty</td>
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<table>
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<th>Comment ID: PSLPP16/6639</th>
<th>Respondent: 10829121 / Julie Brown</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 POLICY E5 - Rural economy

- Incompatible with high housing numbers proposed for rural areas elsewhere in the plan.
- Insetting and settlement boundary extension endanger appropriate rural activities listed that depend on maintaining rural areas’ character.
- Town-centre uses for rural areas contradict government’s localism policy and need to consult and protect village environments.
- Established commitments to high-speed rural broadband and mobile coverage watered down despite 2014 consultation responses.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

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- Incompatible with high housing numbers proposed for rural areas elsewhere in the plan.
- Insetting and settlement boundary extension endanger appropriate rural activities listed that depend on maintaining rural areas’ character.
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- Established commitments to high-speed rural broadband and mobile coverage watered down despite 2014 consultation responses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1.1 I object to policy E5 “Rural Economy” on the grounds that;

1.2 This policy should only apply to small-scale development in rural areas which means development of less than 100 sq.m (gross) which is in keeping with and the permanence and amenity of the green belt.
1.3 Use of rural areas for town centre uses without applying the sequential approach is against the principles of localism that require local people to be consulted and heeded, not ignored. Villages need protecting in terms of both design and scale.

1.4 Most of the economic activities listed in 4.4.44 depend on maintaining the rural character of our villages which would be endangered by the wholesale “insetting”, boundary expansion and house building proposed in other parts of the plan. This applies also to new and projected enterprises in the Green Belt (e.g. Grange Park Opera’s Theatre in the Woods in West Horsley, which requires a protected, rustic setting to be a success, not housing estates and congested roads). Policy E5 is incompatible with the high housing numbers proposed.

1.5 Previous commitments to improved high-speed broadband and mobile phone coverage have now been diluted, despite general support. This disregards the responses from the 2014 public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7175  Respondent: 10854113 / Sarah Pickering  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

WE OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14646  Respondent: 10857249 / Alice Pashley  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5
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:** PSLPP16/8861  **Respondent:** 10857889 / William Kyte OBE  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy E5: Rural Economy

I OBJECT TO THIS POLICY as written

This policy should only apply to small-scale development in rural areas which means development of less than 100 sq m (gross) which is in keeping with and the permanence and amenity of the green belt.

Use of rural areas for town centre uses without applying the sequential approach is against the principles of localism which means that local people should be consulted and heeded. Villages need protecting both in terms of design and in terms of scale.

Previous commitments to improved high-speed broadband and mobile phone coverage have now been diluted, despite general support.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/18600  **Respondent:** 10858977 / Angela Otterson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to policy E5 Rural Economy

In my opinion this policy should only apply to small-scale development in rural areas which means development of less than 100 sq m (gross) which is in keeping with and the permanence and amenity of the green belt.

Use of rural areas for town centre uses without applying the sequential approach is against the principles of localism that require local people to be consulted and heeded, not ignored. Villages need protecting in terms of both design and scale.

Most of the economic activities listed in 4.4.44 depend on maintaining the rural character of our villages which would be endangered by the wholesale “insetting”, boundary expansion and house building proposed in other parts of the plan. This applies also to new and projected enterprises in the Green Belt (e.g. Grange Park Opera’s Theatre in the Woods in West Horsley, which requires a protected, rustic setting to be a success, not housing estates and congested roads). Policy E5 is incompatible with the high housing numbers proposed.

Previous commitments to improved high-speed broadband and mobile phone coverage have now been diluted, despite general support. This disregards the responses from the 2014 public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICY E5 RURAL ECONOMY

I object to policy E5 Rural Economy

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Use of rural areas for town centre uses without applying the sequential approach is against the principles of localism that require local people to be consulted and heeded, not ignored. Villages need protecting in terms of both design and scale and character.

Previous commitments to improved high-speed broadband and mobile phone coverage have now been diluted, despite general support. This disregards the responses from the 2014 public consultation.

The consultation process was not well publicized; many Parish Councils had no idea of this. The emphasis on voluntary efforts and greater community efforts is far removed from reality for this ‘solution’ was presented for almost every aspect of rural life from managing crime to looking after elderly to education and more besides. Villages by nature are usually small and the percentage of the population who are able to do voluntary work is smaller still. The solution is therefore unworkable. The results of the consultation were not publicized but were instead collated and summarized and bore no resemblance to the submissions I had sight of.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to policy E5
- current rural businesses often rely on rural nature of area - that is why they are there! Whether it is artists, musicians, dog walking companies, therapy practitioners etc

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11011  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? ( )

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Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick's Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18202  Respondent: 10883201 / Danny McHugh  Agent:

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Attached documents:

Comment ID: PSLPP16/11022  Respondent: 10884993 / Dave Fassom  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:
**POLICY E5 – Rural Economy**

I OBJECT to this policy which is against the principal that local people should be consulted and listened to. The town council should not have permission to approve development without adopting the sequential approach.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/11323  **Respondent:** 10923297 / Matthew Burnham  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**I OBJECT TO POLICY E5 (RURAL ECONOMY):**

- Incompatible with high housing numbers proposed for rural areas elsewhere in the plan.
- Insetting and settlement boundary extension endanger appropriate rural activities listed that depend on maintaining rural areas’ character.
- Town-centre uses for rural areas contradict government’s localism policy and need to consult and protect village environments.
- Established commitments to high-speed rural broadband and mobile coverage watered down despite 2014 consultation responses.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/8992  **Respondent:** 10928737 / Guy Pashley  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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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:** PSLPP16/1714  **Respondent:** 10933793 / Julia Tilbury  **Agent:**

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*Note: The content above is extracted from a document and presented in a readable format.*
**POLICY E5 - Rural economy**

I OBJECT. Use of rural areas for town centre uses without applying the sequential approach is against the principles of localism that require local people to be consulted and heeded, not ignored. Villages need protecting in terms of both design and scale.

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**Attached documents:**

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**Comment ID:** PSLPP16/1686  **Respondent:** 10933857 / C J Tilbury  **Agent:**

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POLICY E5 - Rural economy

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**Comment ID:** PSLPP16/15371  **Respondent:** 10935201 / Cathryn Walton  **Agent:**
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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: PSLPP16/12804  Respondent: 10940833 / Natasha Taylor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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Comment ID: PSLPP16/9293  Respondent: 10943457 / Henry Benzikie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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Attached documents:
Comment ID: PSLPP16/9294  Respondent: 10944161 / Stephen Benzikie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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Attached documents:

Comment ID: pslp171/666  Respondent: 10944513 / Amber Ellis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E5

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 rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3046  Respondent: 10952705 / Moira Maidment  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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 rural employment (Policy ES)

Policy ES supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick's Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
**Comment ID:** PSLPP16/15805  **Respondent:** 10953249 / Charlotte Ladd  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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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:** PSLPP16/16740  **Respondent:** 10956161 / Pauline McCallister  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Furthermore the development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been for there decades employing local people and are therefore clearly sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/4646  **Respondent:** 10957025 / Pauline Masters  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. **POLICY E5**

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Attached documents:

Comment ID: PSLPP16/15605  Respondent: 10987905 / Marika Chandler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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Attached documents:

Comment ID: PSLPP16/8377  Respondent: 10989601 / Margaret Mew  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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Attached documents:

Comment ID: PSLPP16/8329  Respondent: 10990145 / Anne Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5
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<th>Comment ID: PSLPP16/3966</th>
<th>Respondent: 11008225 / Russell Pascoe</th>
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<td>Policy E5 - Rural Economy</td>
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<td>I object. Villages need protecting. The policy is incompatible with the high number of proposed houses.</td>
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<td>Respondent: 11024257 / Jenny Richardson</td>
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<th>Comment ID: PSLPP16/16242</th>
<th>Respondent: 11033057 / Jo Komisarczuk</th>
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1 OBJECT to the inclusion of land at Garlicks Arch, Burnt Common, Send Marsh. This land is protected from development as Green Belt; the Government has stated that Housing cannot be a reason for losing Green Belt. Therefore there are no extenuating circumstances, for doing this on such a site, which is a mixture of farm land, and ancient woodland and is a haven for local wildlife, from deer through to bats with all steps in between. I note that no wildlife plan has been included with this plan. The site floods, has no infrastructure and there are no plans for schools, Drs or other planning to support such a site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<th>Comment ID: PSLPP16/17816</th>
<th>Respondent: 11033921 / Tim Depledge</th>
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<td>I object on the basis of how this is being applied - The housing planned for West and East Horsley is not sustainable, and nobody can consider “reasonable” the thought of developing hundreds of homes are needed to help develop the “rural economy” of East and West Horsley. Furthermore, insetting and settlement boundary extension will endanger appropriate rural activities listed that depend on maintaining our local area's rural character.</td>
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<td>The intention to use rural areas for town uses goes against the principles of localism which require local people to be consulted and heeded and therefore not to be ignored. The policy lists economic activities but they rely on the rural character of the villages to be maintained. This character would, ironically, be destroyed by the proposed “insetting”, boundary extension and house building outlined in other parts of the plan.</td>
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Comment ID: PSLPP16/7332  Respondent: 11041121 / Catherine Dean  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5  
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 rural employment implicit in this draft plan. Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

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Comment ID: PSLPP16/1902  Respondent: 11041281 / Chris Harlow  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5  
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Comment ID: PSLPP16/11552  Respondent: 11042433 / Sam Thompson  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5  
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**Comment ID:** PSLPP16/12713  **Respondent:** 11042433 / Sam Thompson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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**Comment ID:** PSLPP16/5501  **Respondent:** 11043553 / Geraldine Banks  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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**Comment ID:** PSLPP16/14599  **Respondent:** 11044129 / Christopher Barrass  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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**Comment ID:** PSLPP16/4870  **Respondent:** 11047329 / Hazel Corstin  **Agent:**  
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5  
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**Comment ID:** PSLPP16/12968  **Respondent:** 11047873 / Mary Waldner  **Agent:**  
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5  
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**Comment ID:** PSLPP16/7563  **Respondent:** 11049473 / Victor Bates  **Agent:**  
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5  
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Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

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:

POLICY E5 (RURAL ECONOMY) – I object. This could never be implemented if the countryside is urbanised by building so many houses. The policy lists a number of valid rural activities that would be put at risk by the insetting and extension of settlement boundaries proposed elsewhere in the plan. Encouraging town centre uses in rural locations would also ruin village surroundings and goes against both government policy and the expressed wishes of the public.

There should be a much stronger commitment to high speed rural broadband and mobile coverage. It is shocking in the 21st century that these should not be available just a few miles from central London.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Attached documents:

I object to policy E5 Rural Economy. In my opinion this policy should only apply to small-scale development in rural areas which means development of less than 100 sq m (gross) which is in keeping with and the permanence and amenity of the green belt. Use of rural areas for town centre uses without applying the sequential approach is against the principles of localization that require local people to be consulted and heeded, not ignored. Villages need protecting in terms of both design and scale and character. Previous commitments to improved high-speed broadband and mobile phone coverage have now been diluted, despite general support. This disregards the responses from the 2014 public consultation.

The consultation process was not well publicized; many Parish Councils had no idea of this. The emphasis on voluntary efforts and greater community efforts is far removed from reality for this ‘solution’ was presented for almost every aspect of rural life from managing crime to looking after elderly to education and more besides. Villages by nature are usually small and the percentage of the population who are able to do voluntary work is smaller still. The solution is therefore unworkable. The results of the consultation were not publicized but were instead collated and summarized and bore no resemblance to the submissions I had sight of.

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Attached documents:

The NRA endorse the inclusion within the first bullet point of Policy E5 the clear statement that to promote a strong rural economy the sustainable growth and expansion of all types of business and enterprise in rural areas will be supported through conversion of existing buildings and provision of well-designed new buildings of appropriate scale, provided they are in accordance with green belt policies and other policies in the plan.

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Attached documents:

21 POLICY E5 RURAL ECONOMY

21.1 I object to policy E5 Rural Economy

21.2 In my opinion this policy should only apply to small-scale development in rural areas which means development of less than 100 sq m (gross) which is in keeping with and the permanence and amenity of the green belt.

21.3 Use of rural areas for town centre uses without applying the sequential approach is against the principles of localism that require local people to be consulted and heeded, not ignored. Villages need protecting in terms of both design and scale.

21.4 Most of the economic activities listed in 4.4.4 depend on maintaining the rural character of our villages which would be endangered by the wholesale “insetting”, boundary expansion and house building proposed in other parts of the plan. This applies also to new and projected enterprises in the Green Belt (e.g. Grange Park Opera’s Theatre in the Woods in West Horsley, which requires a protected, rustic setting to be a success, not housing estates and congested roads). Policy E5 is incompatible with the high housing numbers proposed.

21.5 Previous commitments to improved high-speed broadband and mobile phone coverage have now been diluted, despite general support. This disregards the responses from the 2014 public consultation

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Attached documents:

28 POLICY E5 RURAL ECONOMY

28.1 I object to the amendment to Policy E5 Rural Economy

28.2 I object to the amendment to Policy E5 Rural Economy

28.3 I object to the amendment to Policy E5 Rural Economy

28.4 I object to the amendment to Policy E5 Rural Economy

28.5 I object to the amendment to Policy E5 Rural Economy

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Attached documents:
I OBJECT TO POLICY E5 (RURAL ECONOMY):

- Incompatible with high housing numbers proposed for rural areas elsewhere in the plan.
- Insetting and settlement boundary extension endanger appropriate rural activities listed that depend on maintaining rural areas’ character.
- Town-centre uses for rural areas contradict government’s localism policy and need to consult and protect village environments.
- Established commitments to high-speed rural broadband and mobile coverage watered down despite 2014 consultation responses.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13744  Respondent: 15227905 / Nigel Alexander  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY E5 (RURAL ECONOMY):

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Attached documents:

Comment ID: PSLPP16/1742  Respondent: 15244641 / Wesley Raynbird-Tilbury  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY E5 - Rural economy

I OBJECT. Use of rural areas for town centre uses without applying the sequential approach is against the principles of localism that require local people to be consulted and heeded, not ignored. Villages need protecting in terms of both design and scale.

Most of the economic activities listed in 4.4.44 depend on maintaining the rural character of our villages which would be endangered by the wholesale “insetting”, boundary expansion and house building proposed in other parts of the plan. This applies also to new and projected enterprises in the Green Belt (e.g. Grange Park Opera’s Theatre in the Woods in West Horsley, which requires a protected, rustic setting to be a success, not housing estates and congested roads). Policy E5 is incompatible with the high housing numbers proposed.

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Attached documents:

Comment ID: PSLPP16/1893  Respondent: 15253217 / W Orchard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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 rural employment (Policy ES) Policy ES supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick's Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1935  Respondent: 15254113 / R Orchard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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: PSLPP16/1948  Respondent: 15254785 / M.D. Vickers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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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: PSLPP16/2276  Respondent: 15275009 / Compton Parish Council (Fiona Curtis)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( )

We object to policy E5 Rural Economy Use of rural areas for town centre uses without applying the sequential approach is against the principles of localism that require local people to be consulted and heeded, not ignored. Villages need protecting in terms of both design and scale and character. Previous commitments to improved high-speed broadband and mobile phone coverage have now been diluted, despite general support. This disregards the responses from the 2014 public consultation.

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Comment ID: PSLPP16/17646  Respondent: 15278369 / Ripley Parish Council (Jim Morris)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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.

60. RPC is concerned at the absence of policy protection in the Plan for existing well established local light industry and employment uses to higher value residential development. This is particular significant in rural areas, where the relationship between small scale industry operated by local people is a long term process which, once lost may take very
long periods to recover. Many such industries and employment uses are often forced to re-locate to the urban area where they may not be viable. The local connection, once lost is often irreplaceable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPP16/18676  Respondent: 15278465 / Chris Wright  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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Comment ID: PSLPP16/10955  Respondent: 15282625 / Kelly Graves  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY E5 (RURAL ECONOMY):
• Incompatible with high housing numbers proposed for rural areas elsewhere in the plan.
• Insetting and settlement boundary extension endanger appropriate rural activities listed that depend on maintaining rural areas’ character.
• Town-centre uses for rural areas contradict government’s localism policy and need to consult and protect village environments.
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Comment ID: PSLPP16/2562  Respondent: 15284993 / Samantha Thompson  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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Comment ID: PSLPP16/2577  Respondent: 15285121 / Audrey Boughton  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5
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Comment ID: PSLPP16/2592  Respondent: 15285345 / Mike Boughton  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5
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Comment ID: PSLPP16/2711  Respondent: 15296545 / Catherine Lees  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Furthermore the development at Garlick's Arch would result in the loss of four existing successful rural businesses, which have been for there decades employing local people and are therefore clearly sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2761  Respondent: 15298017 / Margaret Cousins  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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Comment ID: PSLPP16/14222  Respondent: 15299201 / Samira Abdullah  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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I object to policy E5 Rural Economy

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</table>

I object to POLICY E5 - Rural economy

- Incompatible with high housing numbers proposed for rural areas elsewhere in the plan.
- Insetting and settlement boundary extension endanger appropriate rural activities listed that depend on maintaining rural areas’ character.
- Town-centre uses for rural areas contradict government’s localism policy and need to consult and protect village environments.
- Established commitments to high-speed rural broadband and mobile coverage watered down despite 2014 consultation responses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/3317</th>
<th>Respondent: 15327905 / Julia Cook</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5</td>
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</table>

POLICY E5 - Rural economy

I OBJECT. Use of rural areas for town centre uses without applying the sequential approach is against the principles of localism that require local people to be consulted and heeded, not ignored. Villages need protecting in terms of both design and scale.

Most of the economic activities listed in 4.4.44 depend on maintaining the rural character of our villages which would be endangered by the wholesale “insetting”, boundary expansion and house building proposed in other parts of the plan. This applies also to new and projected enterprises in the Green Belt (e.g. Grange Park Opera’s Theatre in the Woods in West Horsley, which requires a protected, rustic setting to be a success, not housing estates and congested roads). Policy E5 is incompatible with the high housing numbers proposed.

Previous commitments to improved high-speed broadband and mobile phone coverage have now been diluted, despite general support. This disregards the responses from the 2014 public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the loss of the rural employment site at Oldlands Field Yard (Policy E5) which is incorporated into the site A43 Garlick’s Arch. There are some 25 employees based in 3 separate long standing businesses that will lose their jobs as a direct result of the closure of this small industrial site. None of the businesses wish to vacate their premises. Indeed Surrey Classic Cars has been on site for over 30 years and is a renowned MG restoration specialist, with nowhere else to relocate locally or affordably.

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 the loss of rural employment

Policy ES supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick's Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3731  Respondent: 15345281 / Alexandra Murphy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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: PSLPP16/3786  Respondent: 15348033 / Peter Nicholas  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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 rural employment (Policy E5).

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them wants to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

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Attached documents:

Comment ID: PSLPP16/3884  Respondent: 15349281 / Steve Aptel  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13648  Respondent: 15349281 / Steve Aptel  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5
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: pslp171/199  Respondent: 15349281 / Steve Aptel  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy E5
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?
If you're keen to use the green belt, go further afield to the outskirts...and build smaller premises for smaller shops to grow new businesses.

.Normandy or Ash...so many places to choose from.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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7. I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Policies E1,E2,E5: I object to.

The first two fly in the face of the fact that a Brown Field site already exists to the south of Burnt Common, yet the GB site is recommended to be used for a mix of warehousing, light industrial and general industrial for sustainable employment, next to what is also proposed as a residential site? The latter is still not necessary IMO and it follows that the former is not either; why? Because it can be housed along with over 100 houses if necessary, on the BF site referred to above. So why create an unnecessary strategic employment site on GB, when a BF site exists nearby to accommodate this growth?
It has to be noted further, that the development of Garlick's Arch would result in the loss of 4 established businesses employing dozens of local people; so IMO this policy is not working in this instance, it is destructive and wasteful as opposed to economic and productive. This is a direct contradiction of the aim of policy E1; again bizarre?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: PSLPP16/4400  **Respondent:** 15367361 / Greg Ganjou  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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: PSLPP16/4431  **Respondent:** 15368129 / Sharon Cork  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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: PSLPP16/4538  **Respondent:** 15368993 / Tessa Spink  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4602  Respondent: 15370497 / Edward Scott  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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: PSLPP16/4614  Respondent: 15370593 / A Gee  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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: PSLPP16/4711  Respondent: 15372417 / P. Mew  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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Attached documents:

Comment ID: PSLPP16/4825  Respondent: 15377953 / cctvtraining.com ltd (Gordon Tyerman)  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY E5 Rural economy

GROUNDS FOR OBJECTION Use of rural areas for town centre uses without applying the sequential approach is against the principles of localism which mean that local people should be consulted – and heeded (not ignored!). Villages need protecting both in terms of design and in terms of scale.

Previous commitments to improved high-speed broadband and mobile phone coverage have now been diluted, despite general support. This is disregarding the responses from the previous consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4851  Respondent: 15379969 / Teresa Britton  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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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: PSLPP16/5131  Respondent: 15386017 / Gareth Sinnett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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Comment ID: PSLPP16/5150  Respondent: 15386337 / Edna Slater  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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Attached documents:

Comment ID: PSLPP16/5389  Respondent: 15390785 / Francesca Molossi-Murphy  Agent:

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Attached documents:

Comment ID: PSLPP16/5473  Respondent: 15398657 / Kim Roberts  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: PSLPP16/5517  Respondent: 15399041 / Sue Ely  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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Attached documents:

### Comment ID: PSLPP16/5650  Respondent: 15405857 / Raymond Mackay  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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Attached documents:

### Comment ID: PSLPP16/5677  Respondent: 15406017 / Eleanor Roberts  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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Attached documents:

Comment ID: PSLPP16/5710  Respondent: 15406529 / David I Allan  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5
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Attached documents:

Comment ID: PSLPP16/5904  Respondent: 15408513 / Brian Rawling  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6001  Respondent: 15420833 / Marjorie Moss  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
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<th>Comment ID: PSLPP16/6128</th>
<th>Respondent: 15424865 / Robert Victor Ewen</th>
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Comment ID: PSLPP16/6262  Respondent: 15427617 / Ken Scotland  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6325  Respondent: 15428225 / Vian Lee  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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: PSLPP16/6570  Respondent: 15434241 / Valerie Sowerby  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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: PSLPP16/6899  Respondent: 15438049 / David A Sprigings  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ). is Legally Compliant? ( )

I object to inclusion of site policy A43 Land at Garlick’s Arch, Send Marsh/Burntcommon and Ripley as it would result in the loss of 4 existing successful rural businesses. These have been there for decades and so are clearly sustainable. There is no need for the planned 7000 sq mts of industrial/warehousing on the Garlick’s Arch site as the Land around Burntcommon warehouse (site 74 in the 2014 Draft Local Plan) is available and the current plan should revert to this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10677  Respondent: 15438049 / David A Sprigings  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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: PSLPP16/6788  Respondent: 15438945 / Jacqueline Davies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ). is Legally Compliant? ( )

I object to POLICY E5 - Rural economy

- Incompatible with high housing numbers proposed for rural areas elsewhere in the plan.
- Insetting and settlement boundary extension endanger appropriate rural activities listed that depend on maintaining rural areas’ character.
- Town-centre uses for rural areas contradict government’s localism policy and need to consult and protect village environments.
- Established commitments to high-speed rural broadband and mobile coverage watered down despite 2014 consultation responses.
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7227  Respondent: 15445793 / Jackie Withers  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5
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: PSLPP16/14370  Respondent: 15446401 / Louise Yandle  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY E5 (RURAL ECONOMY):
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7283  Respondent: 15446753 / David Boyce  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5
### Comment ID: PSLPP16/7388  Respondent: 15448321 / Nicole Mapplebeck  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

5. **I object to the loss of rural employment (Policy E5)**

   Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; and it will result in the loss of existing local rural businesses.

   **What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

   **Attached documents:**

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### Comment ID: PSLPP16/7389  Respondent: 15448353 / Emily Roberts  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

**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: PSLPP16/7390  Respondent: 15448385 / Edward Bates  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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Attached documents:

Comment ID: PSLPP16/7392  Respondent: 15448449 / Carol Roberts  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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: PSLPP16/7635  Respondent: 15450817 / Audrey Gachen  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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:** PSLPP16/7757  **Respondent:** 15451969 / Rosie Lee  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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Attached documents:

**Comment ID:** PSLPP16/14575  **Respondent:** 15454881 / Mark Fielder  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The provision of new industrial sites at Garlick’s Arch (A43) is not needed there is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000 sq m proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/7865  **Respondent:** 15455233 / Andrew Hamilton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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: PSLPP16/8730  Respondent: 15475297 / Jane Patricia Chandler  Agent:

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Attached documents:

### Comment ID: PSLPP16/8931  Respondent: 15478017 / Kirstie Pankhurst  Agent:

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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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of the plan.

Policy E5 is incompatible with the high housing numbers proposed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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**Comment ID:** PSLPP16/15299  **Respondent:** 15571201 / Zoe Dudgeon  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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**Attached documents:**

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**Comment ID:** PSLPP16/11450  **Respondent:** 15571425 / Monika Neczaj  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY E5 (RURAL ECONOMY):

- Incompatible with high housing numbers proposed for rural areas elsewhere in the plan.
- Inserting and settlement boundary extension endanger appropriate rural activities listed that depend on maintaining rural areas’ character.
- Town-centre uses for rural areas contradict government’s localism policy and need to consult and protect village environments.
- Established commitments to high-speed rural broadband and mobile coverage watered down despite 2014 consultation responses.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/11781  **Respondent:** 15571617 / Bruce Garbutt  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
POLICY E5 Rural Economy

I object to the loss of rural employment implicit in this draft plan. Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11581  Respondent: 15571937 / S Bennell  Agent:

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 rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11741  Respondent: 15574337 / Jacqueline Redknapp  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11829  Respondent: 15575009 / Tony Redknapp  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5
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:** PSLPP16/12211  **Respondent:** 15581761 / Peter Lee  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

**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:** PSLPP16/12343  **Respondent:** 15582593 / Dermot McMullan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

**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:** PSLPP16/12407  **Respondent:** 15583169 / Poul Jensen  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

**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:** PSLPP16/12938  **Respondent:** 15586017 / C Maslin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

**POLICY E5 RURAL ECONOMY**

I object to policy E5 Rural Economy.

In my opinion this policy should only apply to small-scale development in rural areas which means development of less than 100 sq m (gross) which is in keeping with and the permanence and amenity of the green belt.

Use of rural areas for town centre uses without applying the sequential approach is against the principles of localism that require local people to be consulted and heeded, not ignored. Villages need protecting in terms of both design and scale and character.

Previous commitments to improved high-speed broadband and mobile phone coverage have now been diluted, despite general support. This disregards the responses from the 2014 public consultation.

The consultation process was not well publicized; many Parish Councils had no idea of this. The emphasis on voluntary efforts and greater community efforts is far removed from reality for this ‘solution’ was presented for almost every aspect of rural life from managing crime to looking after elderly to education and more besides. Villages by nature are usually small and the percentage of the population who are able to do voluntary work is smaller still. The solution is therefore unworkable. The results of the consultation were not publicized but were instead collated and summarized and bore no resemblance to the submissions I had sight of.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/12890  **Respondent:** 15587105 / John Downes  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

**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: PSLPP16/13311  Respondent: 15589889 / Keith Macdonald  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four already existing successful rural businesses which have been in existence for over 30 years plus a further two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13380  Respondent: 15590273 / Eunja Madge  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY E5

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Attached documents:

Comment ID: PSLPP16/13463  Respondent: 15590593 / Johnathan Page  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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<th>Respondent: 15594817 / Toni Thompson</th>
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Attached documents:

Comment ID: PSLPP16/14090  Respondent: 15601121 / Elspeth Anderson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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Attached documents:

Comment ID: PSLPP16/14139  Respondent: 15601185 / Jane Young  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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Attached documents:

Comment ID: PSLPP16/14138  Respondent: 15601217 / Patrick Barrass  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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Attached documents:

Comment ID: PSLPP16/14136  Respondent: 15601249 / Ann Barrass  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5
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Comment ID: PSLPP16/14200  Respondent: 15601473 / Joseph Fort  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5
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Comment ID: PSLPP16/14266  Respondent: 15601953 / Stephen Yandle  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5
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<th>Respondent: 15603489 / Simon Pitt</th>
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**Comment ID:** PSLPP16/14808  **Respondent:** 15607553 / Penelope Gillmore  **Agent:**

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**Attached documents:**

**Comment ID:** PSLPP16/14871  **Respondent:** 15608289 / Olivia Marshall  **Agent:**

<table>
<thead>
<tr>
<th><strong>Document:</strong></th>
<th>Proposed Submission Local Plan: strategy and sites 2016 / Policy E5</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 the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

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**Attached documents:**

**Comment ID:** PSLPP16/14893  **Respondent:** 15608545 / Madeleine Ringshaw  **Agent:**

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Comment ID: PSLPP16/14913  Respondent: 15608801 / Beth Fuller  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5
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Attached documents:

Comment ID: PSLPP16/15212  Respondent: 15610913 / Gillian Hague  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5
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Attached documents:

Comment ID: PSLPP16/15298  Respondent: 15612481 / Gillian Culmer  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5
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Attached documents:

Comment ID: PSLPP16/15413  Respondent: 15614497 / Hannah Yandle  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY E5 (RURAL ECONOMY):
• Incompatible with high housing numbers proposed for rural areas elsewhere in the plan.
• Insetting and settlement boundary extension endanger appropriate rural activities listed that depend on maintaining rural areas’ character.
• Towncentre uses for rural areas contradict government’s localism policy and need to consult and protect village environments,
• Established commitments to highspeed rural broadband and mobile coverage watered down despite 2014 consultation responses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15483  Respondent: 15615745 / Nicholas Thompson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5
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: PSLPP16/15626  Respondent: 15618305 / Lawrence Claridge  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5
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Comment ID: PSLPP16/15625  Respondent: 15618337 / Matthew Pitt  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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Comment ID: PSLPP16/15704  Respondent: 15619041 / Jack Cross  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy E5 - Rural Economy

I object to increasing the rural economy to accommodate large, unsustainable, dormitory towns, i.e. Gosden Hill, former Wisley Airfield, Blackwell Farm.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15746  Respondent: 15623745 / Stella May  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to policy E5 Rural Economy In my opinion this policy should only apply to small-scale development in rural areas which means development of less than 100 sq m (gross) which is in keeping with and the permanence and amenity of the green belt. Use of rural areas for town centre uses without applying the sequential approach is against the principles of localism that require local people to be consulted and heeded, not ignored. Villages need protecting in terms of both design and scale and character. Previous commitments to improved high-speed broadband and mobile phone coverage have now been diluted, despite general support. This disregards the responses from the 2014 public consultation.

The consultation process was not well publicized; many Parish Councils had no idea of this. The emphasis on voluntary efforts and greater community efforts is far removed from reality for this ‘solution’ was presented for almost every aspect of rural life from managing crime to looking after elderly to education and more besides. Villages by nature are usually small and the percentage of the population who are able to do voluntary work is smaller still. The solution is therefore unworkable. The results of the consultation were not publicized but were instead collated and summarized and bore no resemblance to the submissions I had sight of.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15802  Respondent: 15624577 / Alec Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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Attached documents:

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Comment ID: PSLPP16/16338  Respondent: 15640897 / Jackie van Heesewijk  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY E5 (RURAL ECONOMY): • Incompatible with high housing numbers proposed for rural areas elsewhere in the plan. • Insetting and settlement boundary extension endanger appropriate rural activities listed that depend on maintaining rural areas’ character. • Town-centre uses for rural areas contradict government’s localism policy and need to consult and protect village environments. • Established commitments to high-speed rural broadband and mobile coverage watered down despite 2014 consultation responses.

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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: PSLPP16/17653  Respondent: 15674561 / Andy Stallan (WYG)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Section 4.4: Economy Policies: Policy E5

The NRA endorse the inclusion within the first bullet point of Policy E5 the clear statement that to promote a strong rural economy the sustainable growth and expansion of all types of business and enterprise in rural areas will be supported through conversion of existing buildings and provision of well-designed new buildings of appropriate scale, provided they are in accordance with green belt policies and other policies in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17394  Respondent: 15682465 / Nick Beesly  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Economic Policies: I am in support of Policy E1 "Sustainable employment" but believe that Policy E2 "Location for new employment floorspace" fails to realise that Guildford Town Centre is relatively insignificant in economic value added terms. The University Quarter provides three times as much economic gross value added as the Town Centre yet is prejudiced by this policy. I am supportive of Policy E4 "Surrey Research Park", Policy E5 "Rural Economy" and Policy E6 "The leisure and visitor experience" but caution that Policy E7 "Guildford Town Centre" could lead to overdevelopment of the Town Centre.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17607  Respondent: 15688481 / Sally Lescher  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to policy E5 Rural Economy

In my opinion this policy should only apply to small-scale development in rural areas which means development of less than 100 sq m (gross) which is in keeping with and the permanence and amenity of the green belt.
Use of rural areas for town centre uses without applying the sequential approach is against the principles of localism that require local people to be consulted and heeded, not ignored. Villages need protecting in terms of both design and scale and character.

Previous commitments to improved high-speed broadband and mobile phone coverage have now been diluted, despite general support. This disregards the responses from the 2014 public consultation.

The consultation process was not well publicized; many Parish Councils had no idea of this. The emphasis on voluntary efforts and greater community efforts is far removed from reality for this 'solution' was presented for almost every aspect of rural life from managing crime to looking after elderly to education and more besides. Villages by nature are usually small and the percentage of the population who are able to do voluntary work is smaller still.

The solution is therefore unworkable. The results of the consultation were not publicized but were instead collated and summarized and bore no resemblance to the submissions I had sight of.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/17707  **Respondent:** 15697665 / Campaign for Real Ale (Mick Bell)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

**Guildford Borough Local Plan – Proposed Submission Local Plan: strategy sites 2016**

I am writing on behalf of the Surrey/Hants Borders Branch of CAMRA, the Campaign for Real Ale, in relation to the above consultation.

As you would expect, CAMRA’s chief concern is that the Local Plan will afford suitable protection, in planning terms, for public houses. The continuing loss of traditional pubs, both in urban and rural settings, is in our view having a very negative effect on the communities concerned. The planning system affords a potentially powerful line of defence against the efforts of some pub owners to make short-term financial gains at the expense of valuable community facilities. Our hope would be that the Local Plan will include policies which support the retention of community assets like pubs and resist applications for change of use unless there is very clear evidence that the facility is no longer wanted or needed.

I note that the Vision contained in the plan highlights the importance of protecting and supporting community facilities. I would support this, and whilst it is implicit that such community facilities include public houses, it would help strengthen the Plan if this was made clearer.

I am also pleased to note that Policy E5, contains a specific mention of public houses in terms of businesses that will be supported for retention in rural areas. I would agree that pubs they often essential in maintaining the local economy in rural villages. However, this can equally apply in urban areas, such as for example the suburbs of Guildford, where whole communities often have a single pub to act as the focus of the community. I would therefore like to see this policy extended to cover all communities, not just rural areas.

Whilst this is positive I believe your policies in relation to the retention of pubs should be stronger and would therefore suggest that as the Local Plan develops a further policy should be included along the following lines:

That the Council strongly supports retaining public houses, particularly in rural areas where the availability of other premises is limited. Applications for changes of use will be resisted, unless convincing evidence can be provided to show
that the public house is not economically viable. If permission is granted for a change of use, preference will be given to
the premises remaining in some form of community or employment use; as long as there are no traffic, amenity,
environmental or conservation problems as a result.

If applications for a change of use of a public house are received the Council will require evidence that:

- a comprehensive and sustained marketing campaign (agreed in advance by the Council) offering the public
  house for sale as a going concern, has been undertaken, using an agreed valuation of the premises;
- the marketing campaign has run for a period of at least twelve months before the planning application is
  submitted;
- if marketing has been based wholly or partially on an alternative community or employment use, there has been
  prior discussion with the Council on the principle of the proposal; and
- the public house has been offered for sale locally, and in the region, in appropriate publications.

In addition we would strongly advocate that the Council develops pub protection further within a Supplementary
Planning Document (SPD). This has already been done in neighbouring Rushmoor who introduced a SPD relating to
Development Affecting Public Houses and we would like you to consider the introduction of something similar in
Guildford.

We believe the protection of public houses in Guildford is very important and think a SPD or similar would be helpful, by
setting out to developers how they should justify any proposals for change of use, conversion or redevelopment of pub
sites. In particular this could include criteria for the assessment of applications for development proposals affecting the
loss of current or former public houses. CAMRA have produced a Public House Viability Test that can be used to assess
the viability of pubs and help to demonstrate whether or not a particular public house is economically viable. We fully
accept that in some instances a public house may well not be sustainable, but do feel that such a decision should be made
following a sound assessment of need.

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 employment strategy and impact on Garlicks Arch (A43) (Policies E2 and E5)

The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18509  Respondent: 15725409 / Nicholas Ward  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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Attached documents:

Comment ID: PSLPP16/17160  Respondent: 15806849 / Ptarmigan Land  Agent: Iceni Projects Ltd (Stuart Mills)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy E5 refers to the retention and development of local services and community facilities in the inset villages, such as local shops, meeting places, sports venues and cultural buildings. We support this aspiration and actively encourage development that will facilitate the provision of further local services that will enhance the sustainability of villages. Our client is currently exploring the potential to deliver such facilities for local people on the land at Garlick’s Arch in order to boost the sustainability of Send Marsh/ Burnt Common and provide additional benefits for local residents. However, the provision of additional housing of sufficient quantum will assist in ensuring the viability of local shops and services to the benefit of new and existing residents of Send Marsh/ Burnt Common.

The delivery of additional development at Garlick’s Arch will assist in achieving the ‘critical mass’ of Send Marsh/ Burnt Common referred to in Volume 5 of the Council’s Green Belt and Countryside Study, thereby supporting the rural economy by creating additional demand for local shops and services and providing additional funding for local infrastructure and facilities. This will assist in creating a sustainable mixed community, as encouraged by national policy set out in the NPPF.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15563  Respondent: 15977889 / Charles Kimpton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

OBJECT. Local people should be consulted properly using the sequential approach.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/170  Respondent: 17240193 / Anita Aptel  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E5

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Attached documents:

Comment ID: pslp171/341  Respondent: 17267393 / Steve Knight  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I support the protection of agricultural land in rural areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/355  Respondent: 17267745 / Maureen Knight  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E5
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: pslp171/737  Respondent: 17303553 / Anita Fitchie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E5

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Attached documents:

Comment ID: pslp171/769  Respondent: 17303713 / Andrew Fitchie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E5

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Attached documents:

Comment ID: pslp171/842  Respondent: 17308545 / Julia Dawe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Rural Economy

The amendments to the rural economy policies to support small incubator units, loss of shops and services are welcomed given the similarities between the rural areas and villages of our adjacent authority areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/960  Respondent: 17323265 / Simon Owen  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy E5

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Attached documents:

Total records: 436.
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

Document part: Policy E6 - The leisure and visitor experience
Welcome stronger link to environmental character.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

POLICY E6 – The leisure and visitor experience

zzz) The Guildford Society agrees with the draft policy on economic grounds. It is recognised that retailing is undergoing a major transition and complementary leisure experiences are essential in order to extend dwell times.

aaaa) Guildford is clearly well placed to bring forward the River Wey navigation as a visitor experience, complementing amenities such as the Castle, Sports Centres, and surrounding Green Belt. The introduction of pedestrianisation and removal of traffic from the town centre, which are not provided for in the plan, can produce additional benefits.

bbbb) It is noted that better rail services complemented by re-aligned bus services if planned would make the Surrey Hills more accessible in a sustainable manner. The post-Olympic cycling boom in the Surrey Hills shows no sign of abating and better transport plus local business support e.g. cycle repair could support this long term.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
LEISURE AND TOURISM – TOPIC PAPER (2017)
We recognise the benefit of leisure and tourism uses in Guildford and in the context of the local plan. We would have preferred to see a comprehensive approach within the plan to the regeneration of the town centre and riverside. This would provide a more vibrant place (think Richmond Riverside) and increase dwell time, benefitting our retailers, our arts and heritage offerings. By and large there is insufficient prize in the local plan as drafted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/6178  **Respondent:** 8562273 / The Clandon Society (Christopher Dean)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**POLICY E6 - The leisure and visitor experience**

We object to this policy. The policy should acknowledge that much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly, the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/17442  **Respondent:** 8563201 / West Horsley Parish Council (Sam Pinder)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

E6 – The Leisure and visitor experience

Report page: 15

WHPC view: Supports

In brief: Well-loved historic Green Belt village visited by walkers, cyclists and visitors to Surrey Hills

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/17488  **Respondent:** 8563201 / West Horsley Parish Council (Sam Pinder)  **Agent:**
**POLICY E6: The leisure and visitor experience**

West Horsley is a rural and historic village with over 40 Listed Buildings. The village is located between the railway stations of Horsley to the east and West Clandon to the west.

West Horsley is a jewel and gateway for the many visitors to the Surrey Hills Area of Outstanding Natural Beauty, through its network of footpaths, bridleways and lanes leading to the upland areas in the south of the Parish, where The Sheeples (an SSSI) and Woodcote hamlet, once frequently visited by Beatrix Potter, are located.

The southern part of the village has two well-used historic inns, which host walking and cycling groups plus occasional classic car and motorcycle rallies.

Following Guildford Borough’s approval in Spring 2016, West Horsley Place (Grade 1 Listed) and its magnificent estate is to be home to a prestigious Opera House development (lauded by the Head of Surrey County Council); it is even more desirable to preserve the rural character of the village and maintain its openness in 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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**Comment ID:** PSLPP16/3170  **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? ( )

1. **POLICY E6 - The leisure and visitor experience**

I OBJECT  Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for "overdevelopment". Heritage sites and the Green Belt are particularly vulnerable.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.
2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travel card for a day out
in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

I trust the objections made above are fully considered and that the Plan is amended accordingly.

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? ( )

<table>
<thead>
<tr>
<th>Section</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.4.54</td>
<td>The results showed that the countryside surrounding Guildford was a significant attribute, yet this had been omitted, whilst the built environment has been included? It is inappropriate to select parts of the survey and omit others.</td>
</tr>
<tr>
<td>Monitoring</td>
<td>Tourists come to Guildford from all over the world and it important that public transport links be retained at key sites and that they are linked up. This should be added in. It is not viable to be continually subject to review (as the 46 bus is in Compton) when Watts Gallery and restaurants and pubs as well as Nursing homes, all rely on the bus). The 18 month marketing clause should also include local pubs.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Section</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.4.59</td>
<td>I agree with the broad principals but new development must also provide traffic impact info and this should be independently monitored.</td>
</tr>
<tr>
<td>4.4.60</td>
<td>Independent provision should also be marketed (ie B&amp;B / holiday rentals).</td>
</tr>
<tr>
<td>Key Evidence</td>
<td>Key evidence should INCLUDE the NPPF, which has been removed?</td>
</tr>
</tbody>
</table>

### Addendum: The Carter Jonas report states:

3.22 The findings of the retail section of this report should be read in line with the economic paper.

If forecast floorspace cannot be accommodated within existing or proposed town centres policy consideration may be required to support out of centre retail facilities. However, new out of centre floorspace should only be directed to existing locations that are well served by public transport and other sustainable travel modes, and where it can be demonstrated that there will be no ‘significant adverse impact’ on the vitality and viability of existing centres in accordance with the NPPF (paragraph 26).

Table 4.2 Does not indicate whether this table includes internet shopping?

1.15 Lack of growth in Guildford's night life may not be due to people choosing to go to places closer to home, but could also be due to poor night time public transport, expensive taxis and lack of diversity (venues are largely for younger people and older people often have more disposable income).
Is Surrey Sports Centre missing from the report?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/283  Respondent: 8571521 / Surrey Nature Partnership (Sarah Jane Chimbwandira)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We welcome and support the clear reference here to the importance of Guildford’s natural environment to leisure activities and as an attraction to visitors from beyond the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13045  Respondent: 8573793 / Harry Eve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

71. I support the recognition of the value of tourism and leisure to Guildford and support the intention to resist change of use where appropriate. Non-viability might sometimes be used as an unjustified excuse to profit from a change of use to the detriment of the local tourist and leisure economy and I appreciate that Guildford Borough Council recognise this.

72. I object, however, to the encouragement of more development in the countryside. It should be appreciated that the undeveloped countryside is an asset to the tourist and leisure economy and it is all too easy to ruin the appeal of an area through further inappropriate development.

73. The sentence “proposals which promote greater use of the River Wey as a leisure and recreational resource.” Should be heavily qualified by the need to protect the River Wey environment, biodiversity, and its value as a wildlife corridor.

74. This policy has been constructed without reference to the Surrey Nature Partnership which will inform a Countryside Vision and Green and Blue Infrastructure Supplementary Planning Document neither of which have been published.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1696  Respondent: 8573793 / Harry Eve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E6
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I welcome the additional wording at (1)(d) and (2). Appendix A2 should include E6 in the list of policies which is clearly the intention. It would be desirable that any marketing should emphasise that change of use is not an option - to avoid any unintentional loopholes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5958  Respondent: 8575585 / Ian Macpherson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy E6: The leisure and visitor experience
Agree with the commentary. The existing hotel provision is neither sufficient in quantity or quality. There have been suggestions for a luxury hotel or hotels in the general vicinity of Bedford Road - Bridge Street. This could usefully be combined with a high level walkway -see later.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7010  Respondent: 8575617 / Effingham Parish Council (Ian Symes)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

E6 Economy- Leisure and visitor experience
Support

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17560  Respondent: 8581505 / Burpham Neighbourhood Forum (Jim Allen)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Bullet point 4: The wording of this paragraph fails to include the statement “...............recreational resource whilst preventing further erosion of the size of the flood plain or its function to prevent flooding elsewhere.”

The monitoring indicator (Target) states “increase in the number of visitor/bed spaces”; yet there is only one mention in the plan of a ‘hotel’ - and that is in Policy A36 which requires the existing hotel to be demolished to provide space for 48 homes. No site has been allocated for visitor beds, be it caravan/motor home sites or fixed bed, motel or hotel sites.

The target is not achievable, rendering the plan unsound.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2202  Respondent: 8581505 / Burpham Neighbourhood Forum (Jim Allen)  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

4.4.56a

The leisure and visitor experience, insert “Appendix 2 forms part of this policy”

4.4.59

Please add “and enhanced” after “preserved”.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12188  Respondent: 8582017 / The Clandon Society (J Wright)  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.
Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13526  Respondent: 8582977 / Guildford Environment Forum (John Bannister)  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY E6  
I OBJECT to Policy E6 - The leisure and visitor experience.  
The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15527  Respondent: 8585601 / Jennie Kyte  Agent: 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy E6: The leisure and visitor experience

E6 Policy Box, para. 1, bullet point 4: It is important that the river is kept as a green finger of countryside coming into Guildford town, and that river banks and scenery are kept as natural as possible. Much of Guildford’s character stems from its countryside views and closeness of countryside. For example, the river area by the town lock consists of trees and grass, and is extremely popular with visitors and residents. Hard paved banks, unnaturally high built up banks and hard paved paths spoil the natural character of riversides. The River Wey is a narrow river and needs careful planning so that it does not lose its character or degenerates into outlets for take away cafes. Environmental factors need to be considered as well as social and economic factors.

E6 Policy Box, para 3, bullet point 2: It is important to keep a mix of cultural venues in the town to cater for different leisure needs, particularly as Guildford Borough grows in population. This needs to be taken into account when assessing the economic viability of cultural establishments, such as theatres and museums. Social factors besides economic factors need to be taken into account.

Para. 4.4.66: I support the policy in the paragraph. However, a much used launderette on local authority land in Sydenham Rd in a central position opposite a large car park and serving nearby residential areas on the east of the town, which contains families, students and the elderly, has recently closed, causing those who formerly used it to drive across town. It also served as a community centre. It would be of benefit to many if it could be rebuilt with dwellings above.

Para 4.4.74: Vision Box. Comment on retail as in Policy E7 Box

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
POLICY E6: The leisure and visitor centre

4.4.54 The Yvonne Arnaud and G.Live have been added to this paragraph as entertainment and cultural facilities. The Electric Theatre, a town centre theatre in a historic building, should also be added.

I support the addition of the Yvonne Arnaud theatre and G.Live, but object to the omission of the Electric Theatre.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6451  Respondent: 8586369 / Mr Luigi Fort  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

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4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

I conclude by adding I realize I am lucky to live here and can see why many would want to do the same. But unrealistic and overly ambitious development destroys the very elements that make Clandon and neighbouring settlements special. Surrey has few real villages left so why not preserve rather than blight them?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID: PSLPP16/8076  Respondent: 8587489 / University of Surrey (Malcolm Parry)  Agent:**

**Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E6**

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I am supportive of.....and Policy E6 “The leisure and visitor experience”

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID: PSLPP16/2111  Respondent: 8591041 / Surrey Wildlife Trust (Mike Waite)  Agent:**

**Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E6**

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

Policy E6: The leisure and visitor experience.

We welcome the reference here (para. 4.4.55) to the importance of Guildford’s natural environment to leisure activities and as an attraction for visitors from beyond the Borough.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Comment ID: PSLPP16/17637  Respondent: 8595233 / Partners of Loseley Park (Michael More-Molyneux)  
Agent: Strutt & Parker LLP (Rachel Patch)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? (Yes), is Sound? (Yes), is Legally Compliant? (Yes)

We welcome the acknowledgement within the plan that Loseley Park makes an important contribution to leisure in the Borough, as per paragraph 4.4.57 of the Local Plan. The Estate is constantly reviewing operations to ensure it continues to make a high quality contribution to the Borough.

We support the broad thrust of Policy E6, particularly the section encouraging the re-use of small scale rural buildings. The Loseley Estate regularly reviews its buildings to ensure they are being adequately deployed.

We particularly welcome the provisions of the policy that calls for the provision of new and improved accommodation for tourist visitors on the site. The re-use of existing buildings should be encouraged as part of this strategy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1260  Respondent: 8608865 / WBDRA. (David Bird)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

WBDRA SUPPORTS this policy

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2391  Respondent: 8609217 / West Clandon Parish Council (John Stone)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY E6 - The leisure and visitor experience

We object to this policy. The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9093  Respondent: 8609377 / Mr Andy White  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

No location for a hotel has been identified to support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9850  Respondent: 8627393 / Worplesdon Parish Council (Gaynor White)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

E6 Leisure and Visitor Experience

Support.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/462  Respondent: 8640353 / Julian Cranwell  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy E6: The leisure and visitor experience

Response
Summary

I OBJECT. Tourism and visitors do not depend on new visitor attractions and facilities – and these may undermine the area. Overdevelopment is a risk especially in the countryside.

· I believe that the importance of a visitor attraction hub could be much better articulated. Guildford has great potential to become a "must see" destination for tourists and visitors. Surrounded by the natural beauty of the Surrey Hills, it is already distinguished as an historic town. The historic part of the town should be exploited to the full creating a real sense of vibrancy and atmosphere. This should be linked to the attractions of the Museum, the Castle, the Wey and the historic High Street including its views of the Hogs Back. Guildford would be wise to model itself on other historic towns like Bath, Chester and York. The economic impact would create big advantages for both the local niche speciality retail sectors in the town. Given the local and wider catchment of the town Guildford should strive for high quality definition making it a great centre for people to live in and visit. It would be a great mistake if Guildford were to opt for large impersonal department stores and dull high street chain stores at the expense of exploiting its uniqueness and character which would afford greater benefits.

· Guildford the historic “Gateway to the Surrey Hills” has far more potential than Guildford just any other stereotypical centre found anywhere around London. What GBC needs to do is create a theme such as a new “Pilgrims Trail” similar to the Patriots trail in Boston with marked yellow footsteps leading from the station to the River and up through the historic heart of the town.

Detailed response:

The importance of tourism and leisure within the borough is acknowledged by GBC, and thus far this policy is welcomed. Thus far, the principles underlying this policy are given measured and qualified support. However, the emphasis however on development in order to facilitate tourism seems fundamentally misguided, and, as in other areas of the plan, seems to regard both the planning function and local government as a whole as the marketing and sourcing department of the building and civil engineering industries. This is inappropriate and therefore this element merits objection on an overall basis.

It should be noted that Tourism is one of the major industries in the country. Visit Britain notes: “Since 2010 tourism has been the fastest growing sector in the UK in employment terms, responsible for one-third of the net increase in UK jobs between 2010 and 2012.

The report forecasts that the tourism economy will be worth around £127 billion this year (2013), equivalent to 9% of the UK’s GDP supports over 3.1 million jobs, that’s 9.6% of all jobs and 173,000 more than in 2010. The sector is predicted to grow at an annual rate through to 2025 - significantly faster than the overall UK economy (with a predicted annual rate of 3% per annum) and much faster than sectors such as manufacturing, construction and retail.”

In the context of the importance of the tourism sector, it is deeply shocking that there is so little care attached to this section of the local plan. The part of the local economy is likely to grow more quickly than any other sector of the economy, and the damage to the UK economy could result from unrestricted promotion of housing estates and warehouses should be calculated before growth is seen as a motivating force for development.

This area of England is important, and it is visited by tourists and visitors, not primarily because of tourist centres nor even because of sites of significance such as Hatchlands Park, important though that National Trust sites may be.

The importance to the borough of the countryside qua countryside, embodying rural tourism, rural agriculture and its related impact on the local economy cannot be overstated. The contribution of the outstanding countryside in the borough (which is highly valued by walkers, cyclists and many others) has been disregarded.

In this part of England agriculture is prosperous and prospering; and the importance of the countryside to the country as a whole is enhanced.

Set out below are extracts from the submission to the Issues and Options consultation by the Burrows Cross Area Residents’ Association which indicates, just for the villages within the ward of Shere, some of the tourist sites which are of historic, cultural and tourist interest are illustrative only, and many other areas within the borough have equivalent points of local and regional interest. This is indicative of level of information that should be considered for all areas throughout the borough, and that greenfield and Green Belt sites should be avoided wherever possible on these grounds, quite apart from any other environmental factors. It indicates some of the tourist significance of
It should be noted that tourism relies heavily on the agricultural and rural qualities of the landscape in the area, not just to visit particular sites but for walking and cycling on a routine basis.

It should also be noted that activities such as Duke of Edinburgh walks rely heavily on the North Downs for schools in most of the South West quadrant of London. These schools would not send parties of teenagers through the countryside every weekend of spring and early summer if the sites were overdeveloped. Walks along the nationally important North Downs Way or Pilgrims’ Way are of enormous popular importance to all sections of the community. These do not need “facilities” except the informal facilities of cafes, pubs and restaurants that exist within the villages.

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Lack of development is in itself a key element of the attraction to tourists, and this should not be disregarded as a key element of the planning process, which should constrain inappropriate development as much as it should promote development which is socially and environmentally desirable (e.g. in the renovation of brownfield sites).

Appendix:

Extracts from BCARA submission to issues and options consultation as an illustration of the level of tourist activity and areas of interest in rural areas:

NPPF 132 notes an obligation to restrict development in the vicinity of heritage assets. It has already been noted that heritage assets are significant in the villages of Shere (Norman church (1190), mediaeval village buildings (The Old Forge, The Old Prison, Weaver’s House, Wheelwright Cottage), many other listed buildings including the restaurant of Kinghams in a mediaeval building or The White Horse pub, filmed in The Holiday (tourism, local business)) and Gomshall (17th Mill, Tudor houses including the King John House, NT property and land at Netley House). The area also has bronze age hill forts, a Roman temple, High House Shere (1630, Grade 2 listed).

This brief history of Shere (incorporated in full by reference) gives an indication of its historical importance: http://www.sheredelight.com/history.html

This website also gives an indication of the importance of the undamaged nature of the villages and the surroundings to an important industry, which is filming. See http://www.sheredelight.com/films.html. It should be noted that NPPF enjoins local authorities to consider the impact of development on any existing business, and that if this is adverse, then they should not give permission. The impact on the film industry of any development in this area should not be underrated. This would have a significantly negative impact on the local economy of the borough as a whole.

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The area of Abinger Roughs and Netley Park is listed on the NT website; this link is incorporated into this section by reference: [http://www.nationaltrust.org.uk/abinger-roughs-and-netley-park/how-to-get-here/?findPlace=Abinger%20Roughs%20and%20Netley%20Park&type=&view=map](http://www.nationaltrust.org.uk/abinger-roughs-and-netley-park/how-to-get-here/?findPlace=Abinger%20Roughs%20and%20Netley%20Park&type=&view=map). The guide to the locality from the NT (see website link, incorporated by reference) is relevant in the context of local wildlife, which are abundant throughout this parish not just in the area identified by the NT. [http://www.nationaltrust.org.uk/cs/Satellite?blobcol=urldata&blobheader=application%2Fpdf&blobkey=id&blobtable=MungoBlobs&blobwhere=1349108282364&ssbinary=true](http://www.nationaltrust.org.uk/cs/Satellite?blobcol=urldata&blobheader=application%2Fpdf&blobkey=id&blobtable=MungoBlobs&blobwhere=1349108282364&ssbinary=true)

NPPF 126 notes that local authorities have a duty to recognise that heritage assets (and their setting) are an irreplaceable resource and have a duty to conserve them.

NPPF 123 notes that planning decisions should protect areas of tranquillity which have remained relatively undisturbed by noise and for their recreational and amenity value for this reason. In this locality the most prevalent noise is that of birdsong. It is not appropriate to consider this as a possible area for development.

NPPF 118 notes that planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats.

NPPF 115 notes that “Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty”. It is not acceptable to destroy any part of this area, protected over the last two millennia and substantively unchanged, in order to make a short term developmental profit even for a tourism related project. It further comments that the conservation of wildlife and cultural heritage are important considerations in all these areas. NPPF 116 notes that planning permission should be refused in these areas except in exceptional circumstances. This should be incorporated into the local plan.

Overriding force should be given to the Green Belt provisions of NPPF 88 and 89 which generally notes that substantial weight should be given to any harm to the Green Belt and that the construction of new buildings is generally inappropriate.

GBC should be reminded that the AONB has status equivalent to that of a National Park.

Interestingly in National Parks, the National Park authority has overall responsibility for planning policy. For the South Downs National Park, the guidance is of relevance [http://www.southdowns.gov.uk/__data/assets/pdf_file/0013/123232/Agenda_Item_8_Appendix_1_20101203.pdf](http://www.southdowns.gov.uk/__data/assets/pdf_file/0013/123232/Agenda_Item_8_Appendix_1_20101203.pdf)

This states:

“National Parks have two statutory purposes which must be taken into account when considering planning proposals that could have any impact upon a National Park.

To conserve and enhance their natural beauty, wildlife and cultural heritage

To promote opportunities for the public understanding and enjoyment of these special qualities.

If there is a conflict between these two policies then the first must take precedence.”

Other guidance is worth noting. The National Parks and Access to the Countryside Act 1949 legislated for the designation of AONBs and National Parks. Their purpose was to be similar – to conserve and enhance natural beauty. The Countryside Commission defined the purpose of AONB designation in a statement of 1991.

Purpose of AONB Designation

...Is primarily to conserve and enhance natural beauty.
In pursuing the primary purpose of designation, account should be taken of the needs of agriculture, forestry, and other rural industries and of the economic and social needs of local communities. Particular regard should be paid to promoting sustainable forms of social and economic development that in themselves conserve and enhance the environment.

Recreation is not an objective of designation but the demand for recreation should be met so far as this is consistent with the conservation of natural beauty and the needs of agriculture, forestry and other uses."


AONBs and National Parks are recognised in England to be on a par legally because of their nationally important landscapes. The National Planning Policy Framework confirms that AONBs are equivalent to National Parks in terms of their landscape quality, scenic beauty and planning status.

The statutory duty enjoined upon GBC is not to seek to develop but to protect this area – “to conserve and enhance natural beauty”. It appears to have objective seeking growth which is in conflict with the requirements to protect. This is already covered by NPPF in relation to Green Belt status, which is in itself glossed by ministerial guidance, as previously noted (Eric Pickles, Brandon Lewis and others).

Development within the AONB of any form is likely to be damaging. In addition to the overriding restriction on such development under NPPF, the following statement referred to by Natural England is of significance:

“The United Nations Environment Programme (UNEP) has recently drawn attention to studies finding that although developed land covers only a small proportion of North America’s land base, it has a large impact on ecosystem services. For example, roads occupy just 1% of US land area, but they alter the ecological structures and functions of about 22% or more of the land. In US regions with rapid ‘exurban’ (or extensive residential) growth, species richness and endemism diminish as urban cover increases, threatening biodiversity. The fragmentation of natural habitat threatens more than 500 endangered US wildlife species with extinction. It also provides new entry points for invasive species already introduced through other pathways”. 13.Source: United Nations Environment Programme, Global Environment Outlook GEO-5, environment for development, 2007, p.259 at Box 6.30, itself quoted by Natural England.

In other words, seeking growth of any kind within the AONB is inherently undesirable and in conflict with the overriding principles of biodiversity, and therefore sustainability.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10083  Respondent: 8640353 / Julian Cranwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We object to Policy A6 as it stands. Tourism and visitors do not depend on new visitor attractions and facilities – and these may undermine the area. Overdevelopment is a risk especially in the countryside.

• We believe that the importance of a visitor attraction hub could be much better articulated. Guildford has great potential to become a “must see” destination for tourists and visitors. Surrounded by the natural beauty of the Surrey Hills, it is distinguished as an historic county town. The historic part of the town should be exploited to the full creating a real sense of vibrancy and atmosphere. This should be linked to the attractions of the Museum, the Castle, the Wey and the historic...
Street including its views of the Hogs Back. Guildford would be wise to model itself on other historic towns like Bath and York. The economic impact would create big advantages for both the leisure and the niche speciality retail sectors in the town. Given the local and wider catchment of the town Guildford should strive for high quality definition making it a centre for people to live in and visit. It would be a great mistake if Guildford were to opt for large impersonal department stores and dull high street chain stores at the expense of exploiting its uniqueness and character which would afford greater benefits.

• Guildford the historic “Gateway to the Surrey Hills” has far more potential than Guildford just any other stereotypical centre found anywhere around London. What GBC needs to do is create a theme such as a new “Pilgrims Trail” similar to the Patriots trail in Boston USA with marked yellow footsteps leading from the station to the River and up through the historic heart of the town.

The importance of tourism and leisure within the borough is acknowledged by GBC, and thus far this policy is welcomed. Thus far, the principles underlying this policy are given measured and qualified support. However, the emphasis however on development in order to facilitate tourism seems fundamentally misguided, and, as in other areas of the plan, seems to regard both the planning function and local government as a whole as the marketing and sourcing department of the building and civil engineering industries. This is inappropriate therefore this element merits objection on an overall basis.

It should be noted that Tourism is one of the major industries in the country. Visit Britain notes: “Since 2010 tourism has been the fastest growing sector in the UK in employment terms, responsible for one-third of the net increase in UK jobs between 2010 and 2012.

The report forecasts that the tourism economy will be worth around £127 billion this year (2013), equivalent to 9% of the UK’s GDP, supports over 3.1 million jobs, that’s 9.6% of all jobs and 173,000 more than in 2010. The sector is predicted to grow at an annual rate of 3.8% through to 2025 - significantly faster than the overall UK economy (with a predicted annual rate of 3% per annum) and much faster than sectors such as manufacturing, construction and retail.”

In the context of the importance of the tourism sector, it is deeply shocking that there is so little care attached to this section of the local plan. The part of the local economy is likely to grow more quickly than any other sector of the economy, and the damage to the UK economy that could result from unrestricted promotion of housing estates and warehouses should be calculated before growth is seen as a motivating force for development.

This area of England is important, and it is visited by tourists and visitors, not primarily because of tourist centres nor even because of sites of significance such as Hatchlands Park, important though that National Trust sites may be.

The importance to the borough of the countryside qua countryside, embodying rural tourism, rural agriculture and its related impact on the local economy cannot be overstated. The contribution of the outstanding countryside in the borough (which is highly valued by walkers, cyclists and many others) has been disregarded.

In this part of England agriculture is prosperous and prospering; and the importance of the countryside to the country as a whole is enormous.

Set out below are extracts from the submission to the Issues and Options consultation by the Burrows Cross Area Residents’ Association which indicates, just for the villages within the ward of Shere, some of the tourist sites which are of historic, cultural and tourist interest. These sites are illustrative only, and many other areas within the borough have equivalent points of local and regional interest. This is indicative level of information that should be considered for all areas throughout the borough, and that greenfield and Green Belt sites should be located wherever possible on these grounds, quite apart from any other environmental factors. It indicates some of the tourist significance of the area. It should be noted that tourism relies heavily on the agricultural and rural qualities of the landscape in the area, not just to visit particular sites but for walking and cycling on a routine basis.

It should also be noted that activities such as Duke of Edinburgh walks rely heavily on the North Downs for schools in most of the South quadrant of London. These schools would not send parties of teenagers through the countryside every weekend of spring and early summer if the sites were overdeveloped. Walks along the nationally important North Downs Way or Pilgrims’ Way are of enormous popular imp...
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The AA has prepared a walking guide of historical sites associated with Romans and Celts in this parish. http://www.theaa.com/walks/the-romans-and-celts-at-farley-421068

The area of Abinger Roughs and Netley Park is listed on the NT website; this link is incorporated into this section by reference: http://www.nationaltrust.org.uk/abinger-roughs-and-netley-park/how-to-get-
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NPPF 118 notes that planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats. The NT guide to Netley Park and the Abinger Roughs notes in the context of local wildlife: "Lots of birds can be seen and heard on the Roughs. Near the rhododendrons is a good spot - look out for: goldcrests, woodpeckers, wrens, treecreepers, song thrushes, chaffinches and dunnocks." Some of these species, and also the other species noted by the NT such as noctule bats, are of conservation importance and should not be disturbed. (Source: http://www.nationaltrust.org.uk/abinger-roughs-and-netley-park/wildlife/).

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Other guidance is worth noting. The National Parks and Access to the Countryside Act 1949 legislated for the designation of AONBs and National Parks. Their purpose was to be similar – to conserve and enhance natural beauty. The Countryside Commission defined the purpose of AONB designation in a statement of 1991.

Purpose of AONB Designation

• “...Is primarily to conserve and enhance natural beauty.

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In other words, seeking growth of any kind within the AONB is inherently undesirable and in conflict with the overriding principles of biodiversity, and therefore sustainability.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5252   Respondent: 8655233 / Kay Mackay   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY E6

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:
1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

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Attached documents:

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<th>Comment ID:</th>
<th>PSLPP16/5055</th>
<th>Respondent:</th>
<th>8667713 / Victoria Sinnett</th>
<th>Agent:</th>
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<tbody>
<tr>
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I OBJECT to the idea that my leisure experience can be enhanced by the creation of artificial sites such as the proposals for SANG while the countryside itself is degraded by the development proposed for the Green Belt. It is the natural countryside that enhances my leisure experience; for example, the ability to cycle safely along peaceful rural lanes — which will seriously affected by the proposed level of housing development in this Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1079  Respondent: 8687265 / Dagero Ltd (David Roberts)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

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POLICY E6 - The leisure and visitor experience

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2630  Respondent: 8693153 / Vicki Willetts  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY E6 - LEISURE AND VISITOR EXPERIENCE: • Danger of overdevelopment: success doesn’t depend on building “attractions” which can harm heritage and rural settings. No case made for creating new ones. • No policy of opposing reduction in rural hotel capacity. • No definition of what added value interventions by Council can make to normal visitor market mechanisms. • No policy of supporting Guildford countryside as its prime leisure and visitor asset, whose value rises as London gets bigger and busier. • No vision of what the ideal visitor experience of the borough actually is and how to support its various elements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15036  Respondent: 8708545 / Nigel Wicks  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

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Attached documents:

Comment ID: PSLPP16/4511  Respondent: 8709249 / Geoff Spink  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY E6

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Attached documents:
### Comment ID: PSLPP16/11635  Respondent: 8721857 / Andrea Lightfoot  Agent: 

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

Tourism and visitors do not always depend on new visitor “attractions”, ie. Newlands Corner. In this policy, the presumption in favour of development may damage Heritage sites and the Green Belt.

Guildford has many “leisure and visitor attractions” already. Need examples.

The priority should be to protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London.

Don’t ruin our National Attractions ie RHS Wisley with a huge neighbouring development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

### Comment ID: PSLPP16/9064  Respondent: 8723809 / Sally Blake  Agent: 

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object to POLICY E6 - The leisure and visitor experience

- Danger of overdevelopment: success doesn’t depend on building “attractions” which can harm heritage and rural settings. No case made for creating new ones.
- No policy of opposing reduction in rural hotel capacity.
- No definition of what added value interventions by Council can make to normal visitor market mechanisms.
- No policy of supporting Guildford countryside as its prime leisure and visitor asset, whose value rises as London gets bigger and busier.
- No vision of what the ideal visitor experience of the borough actually is and how to support its various elements.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
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I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

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POLICY E6 - The leisure and visitor experience

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I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Object**

The main attraction for the Guildford area is the Surrey Hills AONB. Rather than focus on more attractions (agree some is needed particularly the Museum, Guildford Art Collection, History, Castle etc), there needs to be much more focus on making the most of the Surrey Hills AONB by protecting it from 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:** pslp171/2064  **Respondent:** 8729217 / Karen Stevens  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I support the statement in para 4.4.59 that “The plan seeks to ensure that the borough’s unique natural landscapes and heritage, which contribute so significantly to its appeal as a leisure and tourism destination, are preserved”. However, GBC has failed to put this policy into practice in forming its Plan, as it has included a proposal to build 1,800 homes in the setting to the AONB – an area that contributes significantly to Guildford’s landscape heritage by providing far-reaching views from the Hog’s Back ridge as well as a rural gateway to the town from the west.

It also is in close proximity to the Scheduled Ancient Monument at Manor Farm. Plans by the University to promote this site to local schools and create a small visitors’ centre and nature trails have unfortunately not materialised following the 2003 Local Plan. GBC should strengthen this policy to ensure that any commitments/promises made by developers (such as the University) come to fruition.

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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**Comment ID:** PSLPP16/9652  **Respondent:** 8729569 / Carolyn Kimpton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy E6 The Leisure and visitor experience

Guildford town centre is a most attractive market town overlooking hills and countryside.

Its greatest draw being that it is not a stereotypical town engulfed by ugly outlet stores and industrial buildings and has much to offer.

Visitors from overseas, London and the rest of the UK enjoy the benefits of a sophisticated town offering excellent shopping, culture, sports and attractions whilst retaining its character and size. It is pleasurable to visit in comparison to Croydon, Reading, Portsmouth, Southampton and Kingston.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6713   Respondent: 8731649 / Ian Slater   Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

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Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3948  Respondent: 8744257 / Mary E Bridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

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: PSLPP16/9358   Respondent: 8744417 / Mark & Gillie Hammersley   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

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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:** PSLPP16/12325  **Respondent:** 8749473 / Charlotte Beckett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

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Attached documents:

Comment ID: PSLPP16/8591  Respondent: 8751105 / Amanda Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

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: PSLPP16/12550  Respondent: 8769793 / Laura Richards  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6
I OBJECT to Policy E6 - The leisure and visitor experience.

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**Comment ID:** PSLPP16/4901  **Respondent:** 8771233 / Ranald Mackinnon  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

**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: PSLPP16/5598  
Respondent: 8771265 / H C MacKinnon  
Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6  

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<th>Comment ID: PSLPP16/16703</th>
<th>Respondent: 8772801 / David French</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6</td>
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Attached documents:

Comment ID: PSLPP16/1146  Respondent: 8776417 / Nici Holland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

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Attached documents:

Comment ID: PSLPP16/17036  Respondent: 8787969 / K Britton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

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Attached documents:

Comment ID: PSLPP16/2989  Respondent: 8796673 / Suzanne Burroughs  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

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Comment ID: PSLPP16/7598  Respondent: 8798849 / David Williams  Agent:

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POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

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I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12757  Respondent: 8800545 / Bill Taylor  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

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: PSLPP16/16656  Respondent: 8810849 / Charles Lee  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY E6 - The leisure and visitor experience

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Comment ID: PSLPP16/2788  Respondent: 8813601 / Gaenor Richards  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

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Attached documents:

Comment ID: PSLPP16/16452  Respondent: 8818625 / Beth and Frank Fuller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be...
argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

**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>PSLPP16/13266</th>
<th>Respondent:</th>
<th>8820353 / Gillian Beaton</th>
<th>Agent:</th>
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**POLICY E6**

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<th>Respondent: 8826081 / Simon Wilcockson</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6</td>
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Attached documents:

| Comment ID: PSLPP16/3124 | Respondent: 8826177 / Charles Spence | Agent: |
**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Policy E6 states ‘the rural parts of the borough also offer considerable recreational and tourism opportunities. Attractions include the Royal Horticultural Society Gardens at Wisley, impressive historic properties such as Loseley Park and the National Trust properties of Clandon Park and Hatchlands Park, and the Chilworth Powder Mills’. This is correct, so why is so much development focused on Wisley, Clandon and Horsley to the detriment of three of the five properties listed? I object to the adverse impact on the rural 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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**Comment ID:** PSLPP16/13406  **Respondent:** 8826369 / Tim Madge  **Agent:**

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

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<th>Comment ID: PSLPP16/4581</th>
<th>Respondent: 8827777 / Mary English</th>
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I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment.

Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor 'attractions' and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment 'Disneyfication'. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many 'leisure and visitor attractions' already. The case for creating more is not made and no examples are given. Instead, the plan's explicit priorities should be:

1. To protect the borough's prime leisure and tourism asset, its countryside, from inappropriate This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford's river landscape less off-putting and support town-break packages for high value To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An 'English town break' (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

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POLICY E6

I OBJECT to Policy E6 - The leisure and visitor experience.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15772  Respondent: 8836129 / Roger Shapley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We object to this policy that implies the “Disney-fication” of rural areas. Tourism and visitors do not depend on new visitor “attractions”. Overdevelopment of countryside is a risk. Surrounded by the natural beauty of the Surrey Hills, Guildford is distinguished as an historic county town.

The historic part of the town should be exploited to the full creating a real sense of vibrancy and atmosphere. This should be linked to the attractions of the Museum, the Castle, the Wey and the historic High Street including its views of the Hogs Back. Guildford would be wise to model itself on other historic towns like Bath, Chester and York. The economic impact would create big advantages for both the leisure and the niche speciality retail sectors in the town Guildford the historic

“Gateway to the Surrey Hills” has far more potential than Guildford being a stereotypical centre found anywhere around London. The countryside can offer high quality tourism – including cycling, National Trust sites, open countryside and cultural events including theatre and opera – which is lucrative. This is not recognised fully.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7126  Respondent: 8837313 / Maria Baker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY E6 - The leisure and visitor experience

I OBJECT.Tourism and visitors do not depend on new visitor "attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/"Disneyfication ". Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many "leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:
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2. To help make Guildford's river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending.

The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An "English town break"

(including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

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Attached documents:
Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently bypass Guildford to go to Bath, Oxford or Cambridge instead.

THE TOWN CENTRE OPPORTUNITY

I do not consider that the target of 1,172 homes in the town centre takes account of the need and demand for housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town which will in itself help to sustain the retail core by increased economic impact. What the town centre needs in terms of urban regeneration and to attain a thriving night time economy is more residential development.

The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015. The reality is that the Town Centre and other areas of brownfield in the borough has the capacity to provide significantly more than this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13431  Respondent: 8840033 / Jimmy Daboo  Agent:  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY E6

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>I OBJECT to policy E6 because we do not need to create new visitor attractions. Conversely, we need to preserve the Green Belt and the countryside. If we just preserve the greenbelt and the natural countryside there will continue to be sufficient reasons for tourists to come and visit.</td>
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<td>I approve strongly in principle, although I am astonished how little the Council makes of its <em>existing</em> cultural and historical attractions WITHOUT actually having to run to the time and expense of developing new ones. Guildford is a unique treasure trove, and it’s remarkable how little space in the plan is dedicated to this policy. Tourism is a major industry and revenue source that could be easily increased in this borough with very little expenditure. The scale of the Heritage Open Days, which are far superior to most other areas in the country, should make the potential of our borough blindingly obvious to the Council. Perhaps it’s a case of not appreciating what you’ve got on your own doorstep. Currently Guildford is rather overshadowed by London. This can be improved significantly, for example redevelopment of riverside frontage near cinema, stronger marketing of attractions (e.g. to tourists passing through London), signage, information (e.g. castle gardens, river boat trips, and café at back of Guildford House Gallery are somewhat hidden treasures) etc. I should point out, however, that any new development in this sphere should be strictly minimized, as OVERdevelopment will deter the very same visitors it seeks to attract.</td>
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Monitoring Indicators. Surely there should be some way of monitoring tourist numbers (not just those staying in visitor accommodation), and take-up of leisure and sporting facilities?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1. POLICY E6 – The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor "attractions" and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/”Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many "leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan's explicit priorities should be:

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1. To rule out the redevelopment of scarce rural hotel sites (e. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to Policy A6 as it stands. Tourism and visitors do not depend on new visitor attractions and facilities – and these may undermine the area. Overdevelopment is a risk especially in the countryside.

- I believe that the importance of a visitor attraction hub could be much better articulated. Guildford has great potential to become a “must see” destination for tourists and visitors. Surrounded by the natural beauty of the Surrey Hills, it is distinguished as an historic county town. The historic part of the town should be exploited to the full creating a real sense of vibrancy and atmosphere. This should be linked to the attractions of the Museum, the Castle, the Wey and the historic High Street including its views of the Hogs Back. Guildford would be wise to model itself on other historic towns like Bath and York. The economic impact would create big advantages for both the leisure and the niche speciality retail sectors of the town. Given the local and wider catchment of the town Guildford should strive for high quality definition making it a prime centre for people to live in and visit. It would be a great mistake if Guildford were to opt for large impersonal department stores and dull high street chain stores at the expense of exploiting its uniqueness and character which would afford far greater benefits.

- Guildford the historic “Gateway to the Surrey Hills” has far more potential than Guildford just any other stereotypical centre found anywhere around London. What GBC needs to do is create a theme such as a new “Pilgrims Trail” similar to the Patriots trail in Boston USA with marked yellow footsteps leading from the station to the River and up through the historic heart of the town.

The importance of tourism and leisure within the borough is acknowledged by GBC, and thus far this policy is welcomed. Thus far, the principles underlying this policy are given measured and qualified support. However, the emphasis however on development in order to facilitate tourism seems fundamentally misguided, and, as in other areas of the plan, seems to regard both the planning function and local government as a whole as the marketing and sourcing department of the building and civil engineering industries. This is inappropriate and therefore this element merits objection on an overall basis.

It should be noted that Tourism is one of the major industries in the country. Visit Britain notes: “Since 2010 tourism has been the fastest growing sector in the UK in employment terms, responsible for one-third of the net increase in UK jobs between 2010 and 2012.

The report forecasts that the tourism economy will be worth around £127 billion this year (2013), equivalent to 9% of the UK’s GDP, supports over 3.1 million jobs, that’s 9.6% of all jobs and 173,000 more than in 2010. The sector is predicted to grow at an annual rate of 3.8% through to 2025 - significantly faster than the overall UK economy (with a predicted annual rate of 3% per annum) and much faster than sectors such as manufacturing, construction and retail.”

In the context of the importance of the tourism sector, it is deeply shocking that there is so little care attached to this section of the local plan. The part of the local economy is likely to grow more quickly than any other sector of the economy, and the damage to the UK economy...
could result from unrestricted promotion of housing estates and warehouses should be calculated before growth is seen as a motivating force for development.

This area of England is important, and it is visited by tourists and visitors, not primarily because of tourist centres nor even because of sites of significance such as Hatchlands Park, important though that National Trust sites may be.

The importance to the borough of the countryside qua countryside, embodying rural tourism, rural agriculture and its related impact on the local economy cannot be overstated. The contribution of the outstanding countryside in the borough (which is highly valued by walkers, cyclists and many others) has been disregarded.

In this part of England agriculture is prosperous and prospering; and the importance of the countryside to the country as a whole is enormous.

Set out below are extracts from the submission to the Issues and Options consultation by the Burrows Cross Area Residents’ Association which indicates, just for the villages within the ward of Shere, some of the tourist sites which are of historic, cultural and tourist interest. These are illustrative only, and many other areas within the borough have equivalent points of local and regional interest. This is indicative of the level of information that should be considered for all areas throughout the borough, and that greenfield and Green Belt sites should be avoided wherever possible on these grounds, quite apart from any other environmental factors. It indicates some of the tourist significance of the area. It should be noted that tourism relies heavily on the agricultural and rural qualities of the landscape in the area, not just to visit particular sites but for walking and cycling on a routine basis.

It should also be noted that activities such as Duke of Edinburgh walks rely heavily on the North Downs for schools in most of the South West quadrant of London. These schools would not send parties of teenagers through the countryside every weekend of spring and early summer if the sites were overdeveloped. Walks along the nationally important North Downs Way or Pilgrims’ Way are of enormous popular importance to all sections of the community. These do not need “facilities” except the informal facilities of cafes, pubs and restaurants that exist within the villages.

Furthermore, it should be noted that the cycle trips that are of increasing national importance rely heavily on the Surrey countryside. The Olympic cycle route routed through the Surrey villages, through or past Ripley, Ockham, Clandon, Shere and Gomshall; subsequently followed by Ride Prudential, is regarded as the archetypal illustration of the English countryside at its best for an international audience.

Lack of development is in itself a key element of the attraction to tourists, and this should not be disregarded as a key element of the planning process, which should constrain inappropriate development as much as it should promote development which is socially and environmentally desirable (e.g. in the renovation of brownfield sites).

Appendix:

Extracts from BCARA submission to issues and options consultation as an illustration of the level of tourist activity and areas of interest in rural areas:

NPPF 132 notes an obligation to restrict development in the vicinity of heritage assets. It has already been noted that heritage assets are significant in the villages of Shere (Norman church (1190), mediaeval village buildings (The Old Forge, The Old Prison, Weaver’s House, Wheelwright Cottage), many other listed buildings including the restaurant of Kinghams in a mediaeval building or The White Horse pub, filmed in The Holiday (tourism, local business)) and Gomshall (17th Mill, Tudor houses including the King John House, NT property at Netley House). The area also has bronze age hill forts, a Roman temple, High House Shere (1630, Grade 2 listed).

This brief history of Shere (incorporated in full by reference) gives an indication of its historical importance: http://www.sheredelight.com/history.html

This website also gives an indication of the importance of the undamaged nature of the villages and the surroundings to an important local industry, which is filming. See http://www.sheredelight.com/films.html. It should be noted that NPPF enjoins local authorities to consider the impact of development on any existing business, and that if this is adverse, then they should not give permission. The impact on the film industry of any development in this area should not be underrated. This would have a significantly negative impact on the local economy of the borough as a whole.
Gomshall’s history is summarised usefully on the Wikipedia site: (incorporated by reference): [http://en.wikipedia.org/wiki/Gomshall](http://en.wikipedia.org/wiki/Gomshall). This notes that the Manor of Gumesele was a Saxon feudal landholding; that Gomshall appears in Domesday Book of 1086 as Gomeselle. It was held by William.

In 1154, [Henry II of England](http://en.wikipedia.org/wiki/Henry_II_of_England) divided the Manor of Gumesele into three: West Gomshall (granted to an abbey in Netley so known as Netley after 1240), East Gomshall (granted to an Abbey in Tower Hill in 1376 so now known as Tower Hill) and Somersbury (now Gomshall). This demonstrates that the current boundaries of the village are recognizable from the Domesday book, and that this is in itself of cultural importance. To develop on land adjacent to these boundaries would be wholly inappropriate since that would be to alter the village boundaries that have lasted on a very long term basis as permanent and established features of the landscape, as required by NPPF.

Local industries developed based on the plentiful and constant water supply of the River Tillingbourne. Leather tanning is a historic industry, now gone. Gomshall Mill was the corn mill. Some other businesses based on the Tillingbourne survive, and would be damaged by over development. These include watercress growing (at the Kingfisher Watercress Beds in Abinger) and trout farming (between Abinger and Gomshall, in the area bounded by this study – for both of which clean water is a particular essential ingredient. Damage the water supply and you will kill the business). In addition to these food suppliers, many of the local fields are farmed organically and contribute to the Surrey Hills organic food brands (beef, lamb, pork). The importance of the agricultural industry should not be ignored; it is not reasonable to perceive building a house is “Growth” or “development” while destroying a farm or an agricultural business (which of course economically is negative growth). Those farms have a hugely positive tourist impact too.


The area of Abinger Roughs and Netley Park is listed on the NT website; this link is incorporated into this section by reference:[http://www.nationaltrust.org.uk/abinger-roughs-and-netley-park/how-to-get-here/?findPlace=Abinger%20Roughs%20and%20Netley%20Park&type=&view=map](http://www.nationaltrust.org.uk/abinger-roughs-and-netley-park/how-to-get-here/?findPlace=Abinger%20Roughs%20and%20Netley%20Park&type=&view=map). The guide to the locality from the NT (see web link incorporated by reference) is relevant in the context of local wildlife, which are abundant throughout this parish not just in the area identified by the NT. [http://www.nationaltrust.org.uk/cs/Satellite?blobcol=urldata&blobheader=application%2Fpdf&blobkey=id&blobtable=MungoBlobs&blobwhere=1349108282364&ssbinary=true](http://www.nationaltrust.org.uk/cs/Satellite?blobcol=urldata&blobheader=application%2Fpdf&blobkey=id&blobtable=MungoBlobs&blobwhere=1349108282364&ssbinary=true)

NPPF 126 notes that local authorities have a duty to recognise that heritage assets (and their setting) are an irreplaceable resource and that they have a duty to conserve them.

NPPF 123 notes that planning decisions should protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason. In this locality the most prevalent noise is that of birdsong. It is not appropriate to consider this as a possible area for development.

NPPF 118 notes that planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats.

The NT guide to Netley Park and the Abinger Roughs notes in the context of local wildlife: “Lots of birds can be seen and heard on the Roughs. Near the rhododendrons is a good spot - look out for: goldcrests, woodpeckers, wrens, treecreepers, song thrushes, chaffinches, dunnocks.” Some of these species, and also the other species noted by the NT such as noctule bats, are of conservation importance and should not be disturbed. (Source: [http://www.nationaltrust.org.uk/abinger-roughs-and-netley-park/wildlife/](http://www.nationaltrust.org.uk/abinger-roughs-and-netley-park/wildlife/)).

NPPF 115 notes that “Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty”. It is not acceptable to destroy any part of this area, protected over the last two millennia and substantively unchanged, in order to make a short term developmental profit even for a tourism related project. It further comments that the conservation of wildlife and cultural heritage are important considerations in all these areas. NPPF 116 notes that planning permission should be refused in these areas except in exceptional circumstances. This should be incorporated into the local plan.

Overriding force should be given to the Green Belt provisions of NPPF 88 and 89 which generally notes that substantial weight should be given to any harm to the Green Belt and that the construction of new buildings is generally inappropriate.

GBC should be reminded that the AONB has status equivalent to that of a National Park.

Interestingly in National Parks, the National Park authority has overall responsibility for planning policy. For the South Downs National Park, the guidance is of relevance [http://www.southdowns.gov.uk/__data/assets/pdf_file/0013/123232/Agenda_ITEM_8_Appendix_1_20101203.pdf](http://www.southdowns.gov.uk/__data/assets/pdf_file/0013/123232/Agenda_ITEM_8_Appendix_1_20101203.pdf). This states:
National Parks have two statutory purposes which must be taken into account when considering planning proposals that could have an impact upon a National Park.

To conserve and enhance their natural beauty, wildlife and cultural heritage

To promote opportunities for the public understanding and enjoyment of these special qualities.

If there is a conflict between these two policies then the first must take precedence.”

Other guidance is worth noting. The National Parks and Access to the Countryside Act 1949 legislated for the designation of AONBs and National Parks. Their purpose was to be similar – to conserve and enhance natural beauty. The Countryside Commission defined the purposes of AONB designation in a statement of 1991.

Purpose of AONB Designation

- "...Is primarily to conserve and enhance natural beauty.
- In pursuing the primary purpose of designation, account should be taken of the needs of agriculture, forestry, and other rural industries and of the economic and social needs of local communities. Particular regard should be paid to promoting sustainable forms of social and economic development that in themselves conserve and enhance the environment.
- Recreation is not an objective of designation but the demand for recreation should be met so far as this is consistent with the conservation of natural beauty and the needs of agriculture, forestry and other uses.”


AONBs and National Parks are recognised in England to be on a par legally because of their nationally important landscapes. The National Planning Policy Framework confirms that AONBs are equivalent to National Parks in terms of their landscape quality, scenic beauty and planning status.

The statutory duty enjoined upon GBC is not to seek to develop but to protect this area – “to conserve and enhance natural beauty”. GBC appears to have objective seeking growth which is in conflict with the requirements to protect. This is already covered by NPPF in relation to Green Belt status, which is in itself glossed by ministerial guidance, as previously noted (Eric Pickles, Brandon Lewis and others).

Development within the AONB of any form is likely to be damaging. In addition to the overriding restriction on such development under NPPF, the following statement referred to by Natural England is of significance:

“The United Nations Environment Programme (UNEP) has recently drawn attention to studies finding that although developed land covers only a small proportion of North America’s land base, it has a large impact on ecosystem services. For example, roads occupy just 15% US land area, but they alter the ecological structures and functions of about 22% or more of the land. In US regions with rapid ‘exurban’ (or extensive residential) growth, species richness and endemism diminish as urban cover increases, threatening biodiversity. The fragmentation of natural habitat threatens more than 500 endangered US wildlife species with extinction. It also provides new entry points for invasive species already introduced through other pathways”. 13.Source: United Nations Environment Programme, Global Environment Outlook GE04 – environment for development , 2007,

p.259 at Box 6.30, itself quoted by Natural England.

In other words, seeking growth of any kind within the AONB is inherently undesirable and in conflict with the overriding principles of biodiversity, and therefore sustainability.

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 E6 - The Leisure and Visitor Experience

I object. Tourism doesn't depend on new attractions and could be damaged by creating them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10396 Respondent: 8858881 / Stephen Meredith Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers); much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. The policy should recognise that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, such as at Newlands Corner. Heritage sites and the Green Belt are particularly vulnerable to harm.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2226 Respondent: 8860897 / Julia Shaw Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( )

I object.

Tourism and visitors do not depend on new visitor attractions and facilities – and these may undermine the area. Overdevelopment is a risk especially in the countryside.

- I believe that the importance of a visitor attraction hub could be much better articulated. Guildford has great potential to become a "must see" destination for tourists and visitors. Surrounded by the natural beauty of the Surrey Hills, it is already distinguished as a historic county town. The historic part of the town should be exploited to the full creating a real sense of vibrancy and atmosphere.

This should be linked to the attractions of the Museum, the Castle, the Wey and the historic High Street including its views of the Hogs Back. Guildford would be wise to model itself on other historic towns like Bath, Chester and York. The economic impact would create big advantages for both the leisure and the niche speciality retail sectors in the town. Given the local and wider catchment of the town Guildford should strive for high quality definition making it a great centre for people to live in and visit. It would be a great mistake if Guildford were to opt for large impersonal department stores and dull high street chain stores at the expense of exploiting its uniqueness and character which would afford greater benefits.
• Guildford the historic “Gateway to the Surrey Hills” has far more potential than Guildford just any other stereotypical centre anywhere around London. What GBC needs to do is create a theme such as a new “Pilgrims Trail” similar to the Patriots trail in Boston USA with marked yellow footsteps leading from the station to the River and up through the historic heart of the town.

The importance of tourism and leisure within the borough is acknowledged by GBC, and thus far this policy is welcomed. Thus far, the principles underlying this policy are given measured and qualified support. However, the emphasis however on development in order to facilitate tourism seems fundamentally misguided, and, as in other areas of the plan, seems to regard both the planning function and local government as a whole as the marketing and sourcing department of the building and civil engineering industries. This is inappropriate and therefore this element merits objection on an overall basis.

It should be noted that Tourism is one of the major industries in the country. Visit Britain notes: “Since 2010 tourism has been the fastest growing sector in the UK in employment terms, responsible for one-third of the net increase in UK jobs between 2010 and 2012.

The report forecasts that the tourism economy will be worth around £127 billion this year (2013), equivalent to 9% of the UK’s GDP, supports over 3.1 million jobs, that’s 9.6% of all jobs and 173,000 more than in 2010. The sector is predicted to grow at an annual rate through to 2025 - significantly faster than the overall UK economy (with a predicted annual rate of 3% per annum) and much faster than sectors such as manufacturing, construction and retail.”

In the context of the importance of the tourism sector, it is deeply shocking that there is so little care attached to this section of the local plan. The part of the local economy is likely to grow more quickly than any other sector of the economy, and the damage to the UK economy could result from unrestricted promotion of housing estates and warehouses should be calculated before growth is seen as a motivating force for development.

This area of England is important, and it is visited by tourists and visitors, not primarily because of tourist centres nor even because of sites of significance such as Hatchlands Park, important though that National Trust sites may be.

The importance to the borough of the countryside qua countryside, embodying rural tourism, rural agriculture and its related impact on the local economy cannot be overstated. The contribution of the outstanding countryside in the borough (which is highly valued by walkers, cyclists and many others) has been disregarded.

In this part of England agriculture is prosperous and prospering; and the importance of the countryside to the country as a whole is enormous.

Set out below are extracts from the submission to the Issues and Options consultation by the Burrows Cross Area Residents’ Association which indicates, just for the villages within the ward of Shere, some of the tourist sites which are of historic, cultural and tourist interest. These are illustrative only, and many other areas within the borough have equivalent points of local and regional interest. This is indicative of the level of information that should be considered for all areas throughout the borough, and that greenfield and Green Belt sites should be avoided wherever possible on these grounds, quite apart from any other environmental factors. It indicates some of the tourist significance of this area. It should be noted that tourism relies heavily on the agricultural and rural qualities of the landscape in the area, not just to visit particular sites of significance such as Hatchlands Park, important though that National Trust sites may be.

It should be noted that tourism relies heavily on the agricultural and rural qualities of the landscape in the area, not just to visit particular sites of significance but for walking and cycling on a routine basis.

Furthermore, it should be noted that the cycle trips that are of increasing national importance rely heavily on the Surrey countryside. The Olympic cycle route routed through the Surrey villages, through or past Ripley, Ockham, Clandon, Shere and Gomshall; subsequently followed by Ride Prudential, is regarded as the archetypal illustration of the English countryside at its best for an international audience.

Lack of development is in itself a key element of the attraction to tourists, and this should not be disregarded as a key element of the planning process, which should constrain inappropriate development as much as it should promote development which is socially and environmentally desirable (e.g. in the renovation of brownfield sites).

Appendix:
Extracts from BCARA submission to issues and options consultation as an illustration of the level of tourist activity and areas of interest in rural areas:

NPPF 132 notes an obligation to restrict development in the vicinity of heritage assets. It has already been noted that heritage assets are significant in the villages of Shere (Norman church (1190), mediaeval village buildings (The Old Forge, The Old Prison, Weaver’s House, Wheelwright Cottage), many other listed buildings including the restaurant of Kinghams in a mediaeval building or The White Horse pub, filmed in The Holiday (tourism, local business)) and Gomshall (17th Mill, Tudor houses including the King John House, NT property and land at Netley House). The area also has bronze age hill forts, a Roman temple, High House Shere (1630, Grade 2 listed).

This brief history of Shere (incorporated in full by reference) gives an indication of its historical importance: http://www.sheredelight.com/history.html

This website also gives an indication of the importance of the undamaged nature of the villages and the surroundings to an important local industry, which is filming. See http://www.sheredelight.com/films.html. It should be noted that NPPF enjoins local authorities to consider the impact of development on any existing business, and that if this is adverse, then they should not give permission. The impact on the film industry of any development in this area should not be underrated. This would have a significantly negative impact on the local economy of the borough as a whole.

Gomshall’s history is summarised usefully on the Wikipedia site: (incorporated by reference): http://en.wikipedia.org/wiki/Gomshall. It notes that the Manor of Gumesele was a Saxon feudal landholding; that Gomshall appears in Domesday Book of 1086 as Gomeselle, held by William.

In 1154, Henry II of England divided the Manor of Gumesele into three: West Gomshall (granted to an abbey in Netley so known as Netley after 1240), East Gomshall (granted to an Abbey in Tower Hill in 1376 so now known as Tower Hill) and Somersbury (now Gomshall). This demonstrates that the current boundaries of the village are recognizable from the Domesday book, and that this is in itself of cultural importance. To develop on land adjacent to these boundaries would be wholly inappropriate since that would be to alter the village boundaries that have lasted on a very long term basis as permanent and established features of the landscape, as required by NPPF.

Local industries developed based on the plentiful and constant water supply of the River Tillingbourne. Leather tanning is a historic industry, now gone. Gomshall Mill was the corn mill. Some other businesses based on the Tillingbourne survive, and would be damaged by overdevelopment. These include watercress growing (at the Kingfisher Watercress Beds in Abinger) and trout farming (between Abinger and Gomshall, in the area bounded by this study – for both of which clean water is a particular essential ingredient. Damage the water supply and you will kill the business). In addition to these food suppliers, many of the local fields are farmed organically and contribute to the Surrey Hills organic food brands (beef, lamb, pork). The importance of the agricultural industry should not be ignored; it is not reasonable to perceive that building a house is “Growth” or “development” while destroying a farm or an agricultural business (which of course economically is negative growth). Those farms have a hugely positive tourist impact too.

The AA has prepared a walking guide of historical sites associated with Romans and Celts in this parish. http://www.theaa.com/walks/the-romans-and-celts-at-farley-421068

The area of Abinger Roughs and Netley Park is listed on the NT website; this link is incorporated into this section by reference:http://www.nationaltrust.org.uk/abinger-roughs-and-netley-park/how-to-get-here/?findPlace=Abinger%20Roughs%20and%20Netley%20Park&type=&view=map. The guide to the locality from the NT (see website link incorporated by reference) is relevant in the context of local wildlife, which are abundant throughout this parish not just in the area identified by the NT. http://www.nationaltrust.org.uk/cs/Satellite?blobcol=urldata&blobheader=application%2Fpdf&blobkey=id&blobtable=MungoBlobs&blobwhere=1349108282364&ssbinary=true

NPPF 126 notes that local authorities have a duty to recognise that heritage assets (and their setting) are an irreplaceable resource and have a duty to conserve them.

NPPF 123 notes that planning decisions should protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason. In this locality the most prevalent noise is that of birdsong. It is not appropriate to consider this as a possible area for development.

NPPF 118 notes that planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats.
The NT guide to Netley Park and the Abinger Roughs notes in the context of local wildlife: “Lots of birds can be seen and heard on the Roughs. Near the rhododendrons is a good spot - look out for: goldcrests, woodpeckers, wrens, treecreepers, song thrushes, chaffinches and dunnocks.” Some of these species, and also the other species noted by the NT such as noctule bats, are of conservation importance and should not be disturbed. (Source: http://www.nationaltrust.org.uk/abinger-roughs-and-netley-park/wildlife/).

NPPF 115 notes that “Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty”. It is not acceptable to destroy any part of this area, protected over the last two millennia and substantively unchanged, in order to make a short term developmental profit even for a tourism related project. It further comments that the conservation of wildlife and cultural heritage are important considerations in all these areas. NPPF 116 notes that planning permission should be refused when given to any harm to the Green Belt and that the construction of new buildings is generally inappropriate.

GBC should be reminded that the AONB has status equivalent to that of a National Park.

Interestingly in National Parks, the National Park authority has overall responsibility for planning policy. For the South Downs National Park, the guidance is of relevance http://www.southdowns.gov.uk/__data/assets/pdf_file/0013/123232/Agenda_Item_8_Appendix_1_20101203.pdf. This states:

“National Parks have two statutory purposes which must be taken into account when considering planning proposals that could have an impact upon a National Park.

To conserve and enhance their natural beauty, wildlife and cultural heritage

To promote opportunities for the public understanding and enjoyment of these special qualities.

If there is a conflict between these two policies then the first must take precedence.”

Other guidance is worth noting. The National Parks and Access to the Countryside Act 1949 legislated for the designation of AONBs and National Parks. Their purpose was to be similar – to conserve and enhance natural beauty. The Countryside Commission defined the purpose of AONB designation in a statement of 1991.

Purpose of AONB Designation

- "...Is primarily to conserve and enhance natural beauty.
- In pursuing the primary purpose of designation, account should be taken of the needs of agriculture, forestry, and other rural industries and of the economic and social needs of local communities. Particular regard should be paid to promoting sustainable forms of social and economic development that in themselves conserve and enhance the environment.
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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 Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development.

For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.
2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
3. To help private providers market local This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English
town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

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1. POLICY E6 - The leisure and visitor experience

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7659  Respondent: 8875457 / Mark Ground  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

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20. POLICY E6 -The leisure and visitor experience

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I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7167  Respondent: 8881345 / Lynne Ground  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

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4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/5761  Respondent: 8883841 / Pamela French  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16632  Respondent: 8883841 / Pamela French  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9356  Respondent: 8892737 / David Eagle  Agent: 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16975  Respondent: 8893057 / Dianne Garnett  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

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 E6 the leisure and visitor experience.

1.2 We believe that the importance of a visitor attraction hub could be much better articulated. Guildford has great potential to become a “must see” destination for tourists and visitors. Surrounded by the natural beauty of the Surrey Hills, it is already distinguished as an historic county town. The historic part of the town should be exploited to the full creating a real sense of vibrancy and atmosphere. This should be linked to the attractions of the Museum, the Castle, the Wey and the historic High Street including its views of the Hogs Back. Guildford would be wise to model itself on other historic towns like Bath, Chester and York.

1.3 The economic impact would create big advantages for both the leisure and the niche speciality retail sectors in the town. Given the local and wider catchment of the town Guildford should strive for high quality definition making it a great centre for people to live in and visit. It would be a great mistake if Guildford were to opt for large impersonal department stores and dull high street chain stores at the expense of exploiting its uniqueness and character which would afford greater benefits.

1.4 Guildford the historic “Gateway to the Surrey Hills” has far more potential than Guildford just any other stereotypical centre found anywhere around London. What GBC needs to do is create a theme such as a new “Pilgrims Trail” similar to the Patriots trail in Boston USA with marked yellow footsteps leading from the station to the River and up through the historic heart of the town.

1.5 There is a need to make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

1.6 There is a need to help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to RHS Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently bypass Guildford to go to Bath, Oxford or Cambridge instead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
18. POLICY E6

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to policy E6 because we do not need to create new visitor attractions. Conversely, we need to preserve the Green Belt and the countryside. If we just preserve the greenbelt and the natural countryside there will continue to be sufficient reasons for tourists to come and visit. That is why they come. We do not need to Disneyfy attractions such as Newlands Corner. Leave them alone.

[A36] I object to the use of the Thatchers Hotel site for housing. There are too few hotels already and the Thatchers Hotel is close to the new Opera house at Horsley Place.

The River frontage needs to be sorted out with proper vision to make it more accessible. It is a great asset not well used at the moment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Borough proposals to demolish the existing hotel at East Horsley, and replace it with at least 48 dwellings, is absurd when the Draft Plan desperately seeks to provide further hotel facilities elsewhere in the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

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Attached documents:

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Comment ID: PSLPP16/4262  Respondent: 8900705 / Susan Fuller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY E6 - The leisure and visitor experience

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4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4128  Respondent: 8901633 / Duncan Gray  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

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: PSLPP16/4201  Respondent: 8904673 / Colin Burnside  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY E6

I OBJECT to Policy E6 - The leisure and visitor experience.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15005  Respondent: 8906273 / G Baptist  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy E6 - The leisure and visitor experience.

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Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

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Attached documents:
I object to Policy E6. The Plan's pro development extends to our countryside as well. Visitors facilities and attractions will turn our stunning countryside into fake Theme Parks which after a few years will be tatty and derelict with no funding. In the short term it will damage existing businesses, evident in other areas of the country where they got it wrong. The rural areas around the Borough is Surrey's most precious asset but The Plan's unsustainable vision will ruin what resident's value the most, the countryside for its NATURAL beauty enjoyed by people who bird watch, enjoy wildlife, experiencing forests, the pleasure of bluebell woodlands, walkers, cyclists, leisure, countryside pursuits and horse riding and a person's wellbeing.

Tourism is a growing industry however The Plan does not protect Green Belt, the AONB, wildlife, The Surrey Hills, the North Down's, Hogs Back, LGV's, SPA, SSSIs or the TBHSPA. To succeed in the future Guildford must exploit its Historic side with its historic architecture. Don't listen to councillors who suggest a one off iconic building. In the past they've ended up on the short list for the worst building in Great Britain.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13260  Respondent: 8921857 / Claire Kukielka  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY E6

I OBJECT to Policy E6 - The leisure and visitor experience.

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Attached documents:

Comment ID: PSLPP16/5794  Respondent: 8924577 / Charles Lee  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

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Comment ID: PSLPP16/15149  Respondent: 8926529 / Annie Cross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy E6 - Leisure and Visitor Experience

The area is already recognised as a tourist area and should be encouraged.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11720  Respondent: 8928033 / P. Richardson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

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I object to this policy. The borough's prime leisure and tourism asset which needs protecting is its countryside, dotted with open villages and visible from the urban centre of Guildford itself, by maintaining all boundaries and the integrity of the Green Belt. This is seen in the large numbers of cyclists particularly and walkers, economically valuable tourists. This lack of development is highly prized in the overcrowded south east of England, particularly so close to London, but also accessible from Europe and from the major airports. There are ample visitor 'attractions' in the region of all sorts. None further are needed. Some such as the town centre of Guildford's Wey riverside could be opened out and enhanced.

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FLAG supports this policy in principle, but stresses that current attractions should be further exploited, rather than creating new ones.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2736  Respondent: 8944929 / A Jefferies  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

29. I object to the continued assumption that Guildford needs more retail. The ELNA fails to understand the shortcomings in the Carter Jonas retail study update 2017 which refers to retail requirement from companies already in administration and also fails to recognise the increasing use of internet shopping over the bricks and mortar experience. This is lamentable as the land allocated for retail could be put to much better use as residential.

32. I object to the fact that there is no evidence that land owned by the council in the town centre is being used for residential development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9377  Respondent: 8948385 / Gillian Eve  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the policy. This policy supports new development of visitor "attractions". Tourism and visitors do not depend on new visitor attractions and facilities - and these may actually undermine the tourism value of heritage sites and the countryside.

I OBJECT to the wording - it is too weak to provide protection. E.g. "All new and enhanced leisure and visitor attractions and facilities should preserve the borough's special heritage and natural features."

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16164  Respondent: 8948385 / Gillian Eve  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 E6

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
### Comment ID: PSLPP16/17305  Respondent: 8967233 / University of Surrey (Sir or Madam)  Agent:  Terence O'Rourke (Luke Vallins)

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

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| I OBJECT to the policy. This policy supports new development of visitor “attractions”. Tourism and visitors do not depend on new visitor attractions and facilities – and these may actually undermine the tourism value of heritage sites and the countryside.  
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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**  
**Attached documents:** |

### Comment ID: PSLPP16/16067  Respondent: 8968001 / M & G Real Estate  Agent:  Terence O'Rourke (Tim Hancock)

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

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| The University is pleased to see that the Council recognises the contribution that the Surrey Sports Park, along with other sporting facilities, makes to promoting and facilitating active lifestyles amongst the borough’s population.  
**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**  
**Attached documents:** |

### Comment ID: PSLPP16/11455  Respondent: 9062913 / Susan Parker  Agent:  

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| 3.15 M&G supports Policy E6. It is important that leisure uses are recognised in paragraph 4.4.55 as playing a crucial role in maintaining the vitality and viability of the town centre and contributing significantly to Guildford’s future economic growth. In addition, M&G supports the statement in paragraph 4.4.58 that there is scope for improvement in the scale and quality of the leisure offer. In the context of the proposed North Street redevelopment, food and drink and other potential leisure uses are an integral part of the shopping centre complex and make an important contribution to its vitality and viability.  
**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**  
**Attached documents:** |
POLICY E6 The leisure and visitor experience

OBJECT Tourism and visitors do not depend on new visitor “attractions”. Overdevelopment of countryside is a risk.

Surrounded by the natural beauty of the Surrey Hills, Guildford is distinguished as an historic county town. The historic part of the town should be exploited to the full creating a real sense of vibrancy and atmosphere. This should be linked to the attractions of the Museum, the Castle, the Wey and the historic High Street including its views of the Hogs Back. Guildford would be wise to model itself on other historic towns like Bath, Chester and York. The economic impact would create big advantages for both the leisure and the niche speciality retail sectors in the town.

Guildford the historic “Gateway to the Surrey Hills” has far more potential than Guildford being a stereotypical centre found anywhere around London. The countryside can offer high quality tourism – including cycling, National Trust sites, open countryside and cultural events including theatre and opera – which is lucrative. This is not recognised fully.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Attached documents:

Comment ID: PSLPP16/4491  Respondent: 9298465 / Peter Grover  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

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1. POLICY E6

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.
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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: PSLPP16/14954  Respondent: 9327009 / sp2 Consulting Limited (Stephen Parker)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT. Tourism and visitors do not depend on new visitor “attractions”. Overdevelopment of countryside is a risk. Surrounded by the natural beauty of the Surrey Hills, Guildford is distinguished as an historic county town. The historic part of the town should be exploited to the full creating a real sense of vibrancy and atmosphere. This should be linked to the attractions of the Museum, the Castle, the Wey and the historic High Street including its views of the Hogs Back. Guildford would be wise to model itself on other historic towns like Bath, Chester and York. The economic impact would create big advantages for both the leisure and the niche speciality retail sectors in the town. Guildford is the historic “Gateway to the Surrey Hills” has far more potential than Guildford being a stereotypical centre found anywhere around London. The countryside can offer high quality tourism – including cycling, National Trust sites, open countryside and cultural events including theatre and opera – which is lucrative. This is not recognised fully.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10646  Respondent: 9335041 / David Reeve  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy E6: The Leisure and Visitor Experience

The problem with this policy is one of drafting. One person’s “high quality visitor experience” is another person’s nightmare – as was borne out by the strong adverse response to Surrey County Council’s proposals for changes at Newlands Corner. Without considerably more detail it is not possible to either agree or disagree with this policy. It will be important to consult residents on applications under this general area, and this should be included in the policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The leisure and visitor experience

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Comment ID: PSLPP16/12682  Respondent: 10619169 / Wendy Critchlow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

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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:** PSLPP16/8227  **Respondent:** 10662849 / Garry Walton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

**POLICY E6 - The leisure and visitor experience**

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<table>
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<th>Comment ID: PSLPP16/4359  Respondent: 10717985 / Alison Drennan  Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6</td>
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- I object that GBC proposals for the development of Send would include the removal of much loved land by the Wey navigation and behind the school. This is most usually enjoyed by residents but also brings visitors to our village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17918  Respondent: 10722049 / Richard Smith  Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6</td>
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</table>
1. I OBJECT to this Trojan horse policy. (Policy H3 – Rural Exception Homes)

It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

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Attached documents:

Comment ID: PSLPP16/5025  Respondent: 10758593 / Richard & Delia Baker  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

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I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12275  Respondent: 10765249 / Andy & Sonja Freebody  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6
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Attached documents:

Comment ID: pslp171/725  Respondent: 10771137 / Lucy Evans  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I’m writing to request that you add the Electric Theatre - alongside the Yvonne Arnaud and GLive- into Policy E6: the leisure and visitor centre, paragraph 4.4.54.

The Electric Theatre is an important part of the entertainment, cultural and community service provided to the borough and should be identified and safeguarded through inclusion in the Local Plan,
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<th>10773441 / Barry Marshall</th>
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Attached documents:

Comment ID: PSLPP16/13699  Respondent: 10782625 / Heather Alexander  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY E6 (LEISURE AND VISITOR EXPERIENCE):

- Danger of over development: success doesn’t depend on building “attractions” which can harm heritage and rural settings. No case made for creating new ones.
- No policy of opposing reduction in rural hotel capacity.
- No definition of what added value interventions by Council can make to normal visitor market mechanisms.
- No policy of supporting Guildford countryside as its prime leisure and visitor asset, whose value rises as London gets bigger and busier.
- No vision of what the ideal visitor experience of the borough actually is and how to support its various elements.

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Attached documents:

Comment ID: PSLPP16/15056  Respondent: 10796417 / Richard Shenton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

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Guildford would be wise to model itself on other historic towns like Bath, Chester and York. The economic impact would create big advantages for both the leisure and the niche speciality retail sectors in the town.

Guildford the historic “Gateway to the Surrey Hills” has far more potential than Guildford being a stereotypical centre found anywhere around London. The countryside can offer high quality tourism – including cycling, National Trust sites, open countryside and cultural events including theatre and opera – which is lucrative. This is not recognised fully.

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**Attached documents:**

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Comment ID: PSLPP16/18383  Respondent: 10799169 / Neal Basson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

OBJECT Tourism and visitors do not depend on new visitor “attractions”. Overdevelopment of countryside is a risk.

Surrounded by the natural beauty of the Surrey Hills, Guildford is distinguished as an historic county town. The historic part of the town should be exploited to the full creating a real sense of vibrancy and atmosphere. This should be linked to the attractions of the Museum, the Castle, the Wey and the historic High Street including its views of the Hogs Back. Guildford would be wise to model itself on other historic towns like Bath, Chester and York. The economic impact would create big advantages for both the leisure and the niche speciality retail sectors in the town.

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Comment ID: PSLPP16/17534  Respondent: 10799425 / Guildford Greenbelt Group (Susan Parker)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We object to Policy A6 as it stands. Tourism and visitors do not depend on new visitor attractions and facilities – and these may undermine the area. Overdevelopment is a risk especially in the countryside.

- We believe that the importance of a visitor attraction hub could be much better articulated. Guildford has great potential to become a “must see” destination for tourists and visitors. Surrounded by the natural beauty of the Surrey Hills, it is distinguished as an historic county town. The historic part of the town should be exploited to the full creating a real sense of vibrancy and atmosphere. This should be linked to the attractions of the Museum, the Castle, the Wey and the historic High Street including its views of the Hogs Back. Guildford would be wise to model itself on other historic towns like Bath, Chester and York.
and York. The economic impact would create big advantages for both the leisure and the niche speciality retail sectors in the
town. Given the local and wider catchment of the town Guildford should strive for high quality definition making it the
centre for people to live in and visit. It would be a great mistake if Guildford were to opt for large impersonal department
stores and dull high street chain stores at the expense of exploiting its uniqueness and character which would afford greater
benefits.

- Guildford the historic “Gateway to the Surrey Hills” has far more potential than Guildford just any other stereotypical
centre found anywhere around London. What GBC needs to do is create a theme such as a new “Pilgrims Trail” similar to
the Patriots trail in Boston USA with marked yellow footsteps leading from the station to the River and up through the
historic heart of the town.

The importance of tourism and leisure within the borough is acknowledged by GBC, and thus far this policy is welcomed. Thus far, the
principles underlying this policy are given measured and qualified support. However, the emphasis however on development in order to
facilitate tourism seems fundamentally misguided, and, as in other areas of the plan, seems to regard both the planning function and local
government as a whole as the marketing and sourcing department of the building and civil engineering industries. This is inappropriate
therefore this element merits objection on an overall basis.

It should be noted that Tourism is one of the major industries in the country. Visit Britain notes: “Since 2010 tourism has been the fastest
growing sector in the UK in employment terms, responsible for one-third of the net increase in UK jobs between 2010 and 2012.
The report forecasts that the tourism economy will be worth around £127 billion this year (2013), equivalent to 9% of the UK’s GDP. It
supports over 3.1 million jobs, that’s 9.6% of all jobs and 173,000 more than in 2010. The sector is predicted to grow at an annual rate of
3.8% through to 2025 - significantly faster than the overall UK economy (with a predicted annual rate of 3% per annum) and much faster
than sectors such as manufacturing, construction and retail.”

In the context of the importance of the tourism sector, it is deeply shocking that there is so little care attached to this section of the local
plan. The part of the local economy is likely to grow more quickly than any other sector of the economy, and the damage to the
UK economy that could result from unrestricted promotion of housing estates and warehouses should be calculated before growth is seen as a motivating
for development.

This area of England is important, and it is visited by tourists and visitors, not primarily because of tourist centres nor even because of
sites of significance such as Hatchlands Park, important though that National Trust sites may be.

The importance to the borough of the countryside qua countryside, embodying rural tourism, rural agriculture and its related impact on
the local economy cannot be overstated. The contribution of the outstanding countryside in the borough (which is highly valued by walkers,
cyclists and many others) has been disregarded.

In this part of England agriculture is prosperous and prospering; and the importance of the countryside to the country as a whole is enormous.

Set out below are extracts from the submission to the Issues and Options consultation by the Burrows Cross Area Residents’ Association
which indicates, just for the villages within the ward of Shere, some of the tourist sites which are of historic, cultural and tourist interest.
are illustrative only, and many other areas within the borough have equivalent points of local and regional interest. This is indicative of the
level of information that should be considered for all areas throughout the borough, and that greenfield and Green Belt sites should be avoided
wherever possible on these grounds, quite apart from any other environmental factors. It indicates some of the tourist significance of the
area. It should be noted that tourism relies heavily on the agricultural and rural qualities of the landscape in the area, not just to visit particular
sites but for walking and cycling on a routine basis.

It should also be noted that activities such as Duke of Edinburgh walks rely heavily on the North Downs for schools in most of the South
quadrant of London. These schools would not send parties of teenagers through the countryside every weekend of spring and early summer
if the sites were overdeveloped. Walks along the nationally important North Downs Way or Pilgrims’ Way are of enormous popular imp...
to all sections of the community. These do not need “facilities” except the informal facilities of cafes, pubs and restaurants that exist within the villages.

Furthermore, it should be noted that the cycle trips that are of increasing national importance rely heavily on the Surrey countryside. The Olympic cycle route routed through the Surrey villages, through or past Ripley, Ockham, Clandon, Shere and Gomshall; subsequently followed by Ride Prudential, is regarded as the archetypal illustration of the English countryside at its best for an international audience.

Lack of development is in itself a key element of the attraction to tourists, and this should not be disregarded as a key element of the planning process, which should constrain inappropriate development as much as it should promote development which is socially and environmentally desirable (e.g. in the renovation of brownfield sites).

Appendix:

Extracts from BCARA submission to issues and options consultation as an illustration of the level of tourist activity and areas of interest in rural areas:

NPPF 132 notes an obligation to restrict development in the vicinity of heritage assets. It has already been noted that heritage assets are significant in the villages of Shere (Norman church (1190), mediaeval village buildings (The Old Forge, The Old Prison, Weaver’s House, Wheelwright Cottage), many other listed buildings including the restaurant of Kinghams in a mediaeval building or The White Horse pub, filmed in The Holiday (tourism, local business)) and Gomshall (17th Mill, Tudor houses including the King John House, NT property at Netley House). The area also has bronze age hill forts, a Roman temple, High House Shere (1630, Grade 2 listed).

This brief history of Shere (incorporated in full by reference) gives an indication of its historical importance; http://www.sheredelight.com/history.html

This website also gives an indication of the importance of the undamaged nature of the villages and the surroundings to an important local industry, which is filming. See http://www.sheredelight.com/films.html. It should be noted that NPPF enjoins local authorities to consider the impact of development on any existing business, and that if this is adverse, then they should not give permission. The impact on the film industry of any development in this area should not be underrated. This would have a significantly negative impact on the local economy of the borough as a whole.

Gomshall’s history is summarised usefully on the Wikipedia site: (incorporated by reference): http://en.wikipedia.org/wiki/Gomshall, noting that the Manor of Gumesele was a Saxon feudal landholding; that Gomshall appears in Domesday Book of 1086 as Gomeselle, held by William.

In 1154, Henry II of England divided the Manor of Gumesele into three: West Gomshall (granted to an abbey in Netley so known as Netley after 1240), East Gomshall (granted to an Abbey in Tower Hill in 1376 so now known as Tower Hill) and Somersbury (now Gomshall). This demonstrates that the current boundaries of the village are recognizable from the Domesday book, and that this is in itself of cultural importance. To develop on land adjacent to these boundaries would be wholly inappropriate since that would be to alter the village boundaries that have lasted on a very long term basis as permanent and established features of the landscape, as required by NPPF.

Local industries developed based on the plentiful and constant water supply of the River Tillingbourne. Leather tanning is a historic industry, now gone. Gomshall Mill was the corn mill. Some other businesses based on the Tillingbourne survive, and would be damaged by over-development. These include watercress growing (at the Kingfisher Watercress Beds in Abinger) and trout farming (between Abinger and Gomshall, in the area bounded by this study – for both of which clean water is a particular essential ingredient. Damage the water supply and you will kill the business). In addition to these food suppliers, many of the local fields are farmed organically and contribute to the Surrey Hills organic food brands (beef, lamb, pork). The importance of the agricultural industry should not be ignored; it is not reasonable to perceive building a house is “Growth” or “development” while destroying a farm or an agricultural business (which of course economically is negative growth). Those farms have a hugely positive tourist impact too.

The AA has prepared a walking guide of historical sites associated with Romans and Celts in this parish. http://www.theaa.com/walks/the-romans-and-celts-at-farley-421068

The area of Abinger Roughs and Netley Park is listed on the NT website; this link is incorporated into this section by reference: http://www.nationaltrust.org.uk/abinger-roughs-and-netley-park/how-to-get-
The guide to the locality from the NT (see website link, incorporated by reference) is relevant in the context of local wildlife, which are abundant throughout this parish not just in the area identified by the NT. [http://www.nationaltrust.org.uk/cs/Satellite?blobcol=urldata&blobheader=application%2Fpdf&blobkey=id&blobtable=MungoBlobs&blobwhere=134910828364&ssbinary=true](http://www.nationaltrust.org.uk/cs/Satellite?blobcol=urldata&blobheader=application%2Fpdf&blobkey=id&blobtable=MungoBlobs&blobwhere=134910828364&ssbinary=true). NPPF 126 notes that local authorities have a duty to recognise that heritage assets (and their setting) are an irreplaceable resource and that they have a duty to conserve them.

NPPF 123 notes that planning decisions should protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason. In this locality the most prevalent noise is that of birdsong. It is not appropriate to consider this as a possible area for development.

NPPF 118 notes that planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats.

The NT guide to Netley Park and the Abinger Roughs notes in the context of local wildlife: “Lots of birds can be seen and heard on the Roughs. Near the rhododendrons is a good spot - look out for: goldcrests, woodpeckers, wrens, treecreepers, song thrushes, chaffinches, dunnocks.” Some of these species, and also the other species noted by the NT such as noctule bats, are of conservation importance and should not be disturbed. ([Source](http://www.nationaltrust.org.uk/abinger-roughs-and-netley-park/wildlife/)).

NPPF 115 notes that “Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty”. It is not acceptable to destroy any part of this area, protected over the last two millennia and substantively unchanged, in order to make a short term developmental profit even for a tourism related project. It further comments that the conservation of wildlife and cultural heritage are important considerations in all these areas. NPPF 116 notes that planning permission should be refused in these areas except in exceptional circumstances. This should be incorporated into the local plan.

Overriding force should be given to the Green Belt provisions of NPPF 88 and 89 which generally notes that substantial weight should be given to any harm to the Green Belt and that the construction of new buildings is generally inappropriate.

GBC should be reminded that the AONB has status equivalent to that of a National Park.

Interestingly in National Parks, the National Park authority has overall responsibility for planning policy. For the South Downs National Park, the guidance is of relevance [http://www.southdowns.gov.uk/__data/assets/pdf_file/0013/123232/Agenda_Item_8_Appendix_1_20101203.pdf](http://www.southdowns.gov.uk/__data/assets/pdf_file/0013/123232/Agenda_Item_8_Appendix_1_20101203.pdf). This states:

“National Parks have two statutory purposes which must be taken into account when considering planning proposals that could have impact upon a National Park.

To conserve and enhance their natural beauty, wildlife and cultural heritage

To promote opportunities for the public understanding and enjoyment of these special qualities.

If there is a conflict between these two policies then the first must take precedence.”

Other guidance is worth noting. The National Parks and Access to the Countryside Act 1949 legislated for the designation of AONBs and National Parks. Their purpose was to be similar – to conserve and enhance natural beauty. The Countryside Commission defined the purpose of AONB designation in a statement of 1991.

Purpose of AONB Designation

• “…Is primarily to conserve and enhance natural beauty.

• In pursing the primary purpose of designation, account should be taken of the needs of agriculture, forestry, and other rural industries and of the economic and social needs of local communities. Particular regard should be paid to promoting sustainable forms of social and economic development that in themselves conserve and enhance the environment.

• Recreation is not an objective of designation but the demand for recreation should be met so far as this is consistent with the conservation of natural beauty and the needs of agriculture, forestry and other uses.”

AONBs and National Parks are recognised in England to be on a par legally because of their nationally important landscapes. The National Planning Policy Framework confirms that AONBs are equivalent to National Parks in terms of their landscape quality, scenic beauty and their planning status.

The statutory duty enjoined upon GBC is not to seek to develop but to protect this area – “to conserve and enhance natural beauty”. GBC appears to have objective seeking growth which is in conflict with the requirements to protect. This is already covered by NPPF in relation to Green Belt status, which is in itself glossed by ministerial guidance, as previously noted (Eric Pickles, Brandon Lewis and others).

Development within the AONB of any form is likely to be damaging. In addition to the overriding restriction on such development under NPPF, the following statement referred to by Natural England is of significance:

“The United Nations Environment Programme (UNEP) has recently drawn attention to studies finding that although developed land covers only a small proportion of North America’s land base, it has a large impact on ecosystem services. For example, roads occupy just 1% of US land area, but they alter the ecological structures and functions of about 22% or more of the land. In US regions with rapid ‘exurban’ (or extensive residential) growth, species richness and endemism diminish as urban cover increases, threatening biodiversity. The fragmentation of natural habitat threatens more than 500 endangered US wildlife species with extinction. It also provides new entry points for invasive species already introduced through other pathways”. 13. Source: United Nations Environment Programme, Global Environment Outlook GE04 – environment for development, 2007, p.259 at Box 6.30, itself quoted by Natural England.

In other words, seeking growth of any kind within the AONB is inherently undesirable and in conflict with the overriding principles of biodiversity, and therefore sustainability.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
18. POLICY E6

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford.

Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor "attractions" and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/"Disneyfication". Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many "leisure and visitor attractions" already. The case for creating more is not made and no examples are given. Instead, the plan's explicit priorities should be:

• To protect the borough's prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

• To help make Guildford's river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

• To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in An "English town break" (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

• To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to Policy E6 - The leisure and visitor experience.

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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: PSLPP16/6640  Respondent: 10829121 / Julie Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to POLICY E6 - The leisure and visitor experience

- Danger of overdevelopment: success doesn’t depend on building “attractions” which can harm heritage and rural settings. No case made for creating new ones.
- No policy of opposing reduction in rural hotel capacity.
- No definition of what added value interventions by Council can make to normal visitor market mechanisms.
- No policy of supporting Guildford countryside as its prime leisure and visitor asset, whose value rises as London gets bigger and busier.

- No vision of what the ideal visitor experience of the borough actually is and how to support its various elements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3930   Respondent: 10833537 / AC Vause   Agent: 

Document:   Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT. Tourism and visitors do not depend on new visitor "attractions" and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/"Disneyfication". Heritage sites and the Green Belt are particularly vulnerable to harm.

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2. To help make Guildford's river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
3. To help private providers market local tours. This need not involve extra spending. The Council could, for instance, help coordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An "English town break" (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travel card for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/3478  Respondent: 10843361 / Natalie Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to POLICY E6 - The leisure and visitor experience

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- No policy of supporting Guildford countryside as its prime leisure and visitor asset, whose value rises as London gets bigger and busier.
- No vision of what the ideal visitor experience of the borough actually is and how to support its various elements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14476  Respondent: 10846625 / Frank Drennan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

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 E6 “the leisure and visitor experience” on the grounds that;

1.2 The importance of a visitor attraction hub could be much better articulated. Guildford has great potential to become a “must see” destination for tourists and visitors. Surrounded by the natural beauty of the Surrey Hills, it is already distinguished as an historic county town. The historic part of the town should be exploited to the full creating a real sense of vibrancy and atmosphere. This should be linked to the attractions of the Museum, the Castle, the Wey and the historic High Street including its views of the Hogs Back. Guildford would be wise to model itself on other historic towns like Bath, Chester and York.

1.3 The economic impact would create big advantages for both the leisure and the niche speciality retail sectors in the town. Given the local and wider catchment of the town Guildford should strive for high quality definition making it a great centre for people to live in and visit. It would be a great mistake if Guildford were to opt for large impersonal department stores and dull high street chain stores at the expense of exploiting its uniqueness and character which would afford greater benefits.
1.4 Guildford the historic “Gateway to the Surrey Hills” has far more potential than Guildford just any other stereotypical centre found anywhere around London. What GBC needs to do is create a theme such as a new “Pilgrims Trail” similar to the Patriots trail in Boston USA with marked yellow footsteps leading from the station to the River and up through the historic heart of the town.

1.5 There is a need to make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

1.6 There is a need to help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to RHS Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently bypass Guildford to go to Bath, Oxford or Cambridge instead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7187  Respondent: 10854113 / Sarah Pickering  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

WE OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

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2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
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4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14655  Respondent: 10857249 / Alice Pashley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8862   Respondent: 10857889 / William Kyte OBE   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy E6: The leisure and visitor experience

I OBJECT to this policy

Tourism and visitors do not depend on new visitor attractions and facilities which will undermine the area. Overdevelopment will destroy the very things that make Guildford a very desirable place to live, work in and to visit.

Guildford, surrounded by the natural beauty of the Surrey Hills, is already distinguished as an historic county town. The historic part of the town should be exploited to the full. This should be linked to the attractions of the Museum, the Castle, the River Wey and the historic High Street including its views of the Hogs Back.

Guildford should model itself on other historic towns like Bath, Chester and York by capitalising on its unique strengths.

It would be a great mistake if Guildford were to opt for large impersonal department stores and dull high street chain stores at the expense of exploiting its uniqueness and character which would afford greater benefits.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18601   Respondent: 10858977 / Angela Otterson   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to policy E6 the leisure and visitor experience.

I believe that the importance of a visitor attraction hub could be much better articulated. Guildford has great potential to become a “must see” destination for tourists and visitors. Surrounded by the natural beauty of the Surrey Hills, it is already distinguished as an historic county town. The historic part of the town should be exploited to the full creating a real sense of vibrancy and atmosphere. This should be linked to the attractions of the Museum, the Castle, the Wey
and the historic High Street including its views of the Hogs Back. Guildford would be wise to model itself on other historic towns like Bath, Chester and York.

The economic impact would create big advantages for both the leisure and the niche speciality retail sectors in the town. Given the local and wider catchment of the town Guildford should strive for high quality definition making it a great centre for people to live in and visit. It would be a great mistake if Guildford were to opt for large impersonal department stores and dull high street chain stores at the expense of exploiting its uniqueness and character which would afford greater benefits.

 Guildford the historic “Gateway to the Surrey Hills” has far more potential than Guildford just any other stereotypical centre found anywhere around London. What GBC needs to do is create a theme such as a new “Pilgrims Trail” similar to the Patriots trail in Boston USA with marked yellow footsteps leading from the station to the River and up through the historic heart of the town.

There is a need to make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

There is a need to help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to RHS Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently bypass Guildford to go to Bath, Oxford or Cambridge instead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Policy E6 leisure and visitor experience**

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Guildford the historic “Gateway to the Surrey Hills” has far more potential than Guildford just any other stereotypical centre found anywhere around London. Re-branding walks, such as a new “Pilgrims Trail” similar to the Patriots trail in Boston USA with marked yellow footsteps leading from the station to the River and up through the historic heart of the town.
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THE TOWN CENTRE OPPORTUNITY

I do not consider that the target of 1,172 homes in the town centre takes account of the need and demand for housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town which will in itself help to sustain the retail core by increased economic impact. What the town centre needs in terms of urban regeneration and to attain a thriving night time economy is more residential development.

The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015. The reality is that the Town Centre and other areas of brownfield in the borough has the capacity to provide significantly more than this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1610  Respondent: 10865537 / Edwina Fassom  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

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I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

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Attached documents:

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<th>10889985 / Ruth Macdonald</th>
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Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

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**POLICY E6**

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

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- Danger of overdevelopment: success doesn’t depend on building “attractions” which can harm heritage and rural settings. No case made for creating new ones.
- No policy of opposing reduction in rural hotel capacity.
- No definition of what added value interventions by Council can make to normal visitor market mechanisms.
- No policy of supporting Guildford countryside as its prime leisure and visitor asset, whose value rises as London gets bigger and busier.
- No vision of what the ideal visitor experience of the borough actually is and how to support its various elements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPP16/9048  Respondent: 10928737 / Guy Pashley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

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Comment ID: PSLPP16/1715  Respondent: 10933793 / Julia Tilbury  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

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POLICY E6- The leisure and visitor experience

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Comment ID: PSLPP16/1687  Respondent: 10933857 / C J Tilbury  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6
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**Comment ID:** PSLPP16/15372  **Respondent:** 10935201 / Cathryn Walton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

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Comment ID: PSLPP16/12812  Respondent: 10940833 / Natasha Taylor  Agent:

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I object to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Comer is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

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Attached documents:

Comment ID: PSLPP16/18408  Respondent: 10959265 / Inger & Ron Ward  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT  This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

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Attached documents:

Comment ID: PSLPP16/18495  Respondent: 10959265 / Inger & Ron Ward  Agent:

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POLICY E6 - The leisure and visitor experience

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4998  Respondent: 10986689 / Richard Harris  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

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: PSLPP16/15612  Respondent: 10987905 / Marika Chandler  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6
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Comment ID: PSLPP16/8342  Respondent: 10990145 / Anne Lee  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

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Comment ID: PSLPP16/7449  Respondent: 10992833 / Amanda Verny White  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

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3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

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4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

**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: PSLPP16/2457  Respondent: 11014881 / Linda Peters-Smith  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy E6 - The Leisure and Visitor Experience

I object. Tourism doesn't depend on new attractions and could be damaged by creating them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2055  Respondent: 11023585 / Jean Walker  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:
1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

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4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11689  Respondent: 11024257 / Jenny Richardson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

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4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14143  Respondent: 11036289 / Osman Abdullah  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to policy E6 the leisure and visitor experience. I believe that the importance of a visitor attraction hub could be much better articulated. Guildford has great potential to become a “must see” destination for tourists and visitors. Surrounded by the natural beauty of the Surrey Hills, it is already distinguished as an historic county town. The historic part of the town should be exploited to the full creating a real sense of vibrancy and atmosphere. This should be linked to the attractions of the Museum, the Castle, the Wey and the historic High Street including its views of the Hogs Back.

The economic impact would create big advantages for both the leisure and the niche speciality retail sectors in the town. Given the local and wider catchment of the town Guildford should strive for high quality definition making it a great centre for people to live in and visit. Guildford the historic “Gateway to the Surrey Hills” has far more potential than Guildford just any other stereotypical centre found anywhere around London. Re-branding walks, such as a new “Pilgrims Trail” similar to the Patriots trail in Boston USA with marked yellow footsteps leading from the station to the River and up through the historic heart of the town. There is a need to make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms. There is a need to help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to RHS Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently bypass Guildford to go to Bath, Oxford or Cambridge instead. THE TOWN CENTRE OPPORTUNITY1 do not consider that the target of 1,172 homes in the town centre takes account of the need and demand for housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town which will in itself help to sustain the retail core by increased economic impact. What the town centre needs in terms of urban regeneration and to attain a thriving night time economy is more residential development. The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015. The reality is that the Town Centre and other areas of brownfield in the borough has the capacity to provide significantly more than this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14601  Respondent: 11036801 / Judith Mercer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to Policy E6 (Leisure and Visitor experience)

Why does the GBC feel the need to develop tourism through building of new visitor "attractions"? This way of thinking and planning could actually harm the visitor experience especially in the rural areas of the borough e.g. local residents’ arguments over the proposals for Newlands Corner.

In this policy there is a presumption in favour of development which risks the unnecessary over development/commercialisation of a leisure/tourist area which would in fact be harmful to it. The Green Belt and heritage sites are vulnerable to harm in this way and it should be specified in the plan on what basis they will be protected.

Guildford has many leisure and visitor attractions already and there is no case for creating more.

In this populated area, the lack of development is a positive asset to visitors, not a negative one. The rural setting and natural environment lends itself to walking and cycling activities without interference from the Council and is a valuable form of tourism.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7333  Respondent: 11041121 / Catherine Dean  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to this policy. The policy should acknowledge that much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly, the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example, the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attraction. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1912  Respondent: 11041281 / Chris Harlow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

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3. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5515  Respondent: 11043553 / Geraldine Banks  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY E6

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.
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Attached documents:

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Comment ID: PSLPP16/14616  Respondent: 11044129 / Christopher Barrass  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4881  Respondent: 11047329 / Hazel Corstin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY E6

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

I object because Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13005  Respondent: 11047873 / Mary Waldner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY E6

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7599  Respondent: 11049473 / Victor Bates  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy E6 - The leisure and visitor experience.

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Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/Disneyfication. Heritage sites and the Green Belt are particularly vulnerable to harm.

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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:
POLICY E6 (LEISURE AND VISITOR EXPERIENCE) – I object. The policy doesn’t seem to have a clear idea of what an ideal visitor experience would look like. It should give some examples. Instead, it is meddlesome and dangerous. We don’t need to encourage developers to build “attractions” that ruin our heritage and countryside. Where’s the case for building new ones?

The policy needs to state clearly that Guildford supports the protection of the countryside as its biggest leisure and tourism asset, and define what powers (if any) the council can deploy to influence the market. Given Guildford’s lack of hotels, why is there no policy against closing rural guest accommodation such as Thatchers Hotel in East Horsley?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12404  Respondent: 11074465 / Louise Vaughan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY E6

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The Policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable, (for example the new Opera House at West Horsley Place), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the Policy should recognise that in many rural areas, new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example, the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this Policy the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

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Attached documents:

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<thead>
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<th>Comment ID:</th>
<th>PSLPP16/6505</th>
<th>Respondent:</th>
<th>11074561 / Tim Anderson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy E6</td>
<td></td>
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The Town Centre opportunity I do not consider that the target of 1,172 homes in the town centre takes account of the need and demand for housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town which will in itself help to sustain the retail core by increased economic impact. What the town centre needs in terms of urban regeneration and to attain a thriving night time economy is more residential development. The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015. The reality is that the Town Centre and other areas of brownfield in the borough has the capacity to provide significantly more than this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
WE OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment and “Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2663  Respondent: 11113249 / Holy Trinity Amenity Group (HTAG) (Bob Bromham)  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

P90. “To achieve this we will support…proposals which promote greater use of the River Wey as a leisure and recreational resource without harming local biodiversity or water quality”. Add to this “and which do not degrade the natural and historic character of the riverside”. The Wey is a small navigable river, more akin to a canal, and therefore limited in its leisure potential mainly to walking, cycling, and enjoyment of nature. Other leisure developments are acceptable providing they do not remove the band of green riverside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6859  Respondent: 11114721 / Elizabeth Wilcockson  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
POLICY E6 - The leisure and visitor experience

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I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

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 E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Section 4.4: Economy Policies: Policy E6: The leisure and visitor experience

The NRA are pleased to see paragraphs 4.4.53 – 4.4.56 provide a summary of the role and contribution that the leisure and visitor experience provides to the quality of life, social and cultural wellbeing of the Borough. The sectors contribution and value to the Borough’s economy is also rightly noted within the text.

The NRA would be pleased if within paragraph 4.4.55 the Council wished to refer to the Bisley Camp and the NRA as another of the Borough’s named recreational and tourism attractions and leisure opportunity.

The NRA consider the wording of Policy E6 is correctly supportive for the Borough’s future leisure and visitor experience and is pleased to see the provision of new and enhanced leisure and visitor attractions and the provision of new and improved accommodation and conference facilities for tourist and business visitors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2023  Respondent: 11160001 / Andy Freebody  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

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Attached documents:

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Comment ID: PSLPP16/17213  **Respondent:** 11832961 / The National Trust - London and SE (Rachel Botcherby)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

As a major operator of heritage visitor attractions in the Borough, the National Trust is fully supportive of 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: PSLPP16/2479  **Respondent:** 14181313 / Vision for Guildford Ltd - GVG (William Stokoe)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

It is hard, if not impossible, to discern from the Local Plan how such considerable development will be served by appropriate infrastructure. It is not clear what public benefits will accrue in the shape of new public space and better public realm. There is no sense of an overarching plan or design ethos that will support and enhance the historic core of the town that makes it so attractive to its residents and to a wide range of visitors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/24  **Respondent:** 15066945 / Theatres Trust (Ross Anthony)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( Yes ), is Legally Compliant? ( Yes )
The Theatres Trust supports the proposed wording of Policy E6. It clearly aims to promote and protect community and cultural buildings, as guided by para. 70 of the NPPF.

* para. 4.4.57 needs to update the reference to 'policy 14' (from the previous consultation) with 'E6'.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/4766  **Respondent:** 15084897 / Save Send Action Group (Andrew Procter)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

22 POLICY E6 LEISURE AND VISITOR EXPERIENCE

22.1 I object to policy E6 the leisure and visitor experience.

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22.3 The economic impact would create big advantages for both the leisure and the niche speciality retail sectors in the town. Given the local and wider catchment of the town Guildford should strive for high quality definition making it a great centre for people to live in and visit. It would be a great mistake if Guildford were to opt for large impersonal department stores and dull high street chain stores at the expense of exploiting its uniqueness and character which would afford greater benefits.

22.4 Guildford the historic “Gateway to the Surrey Hills” has far more potential than Guildford just any other stereotypical centre found anywhere around London. What GBC needs to do is create a theme such as a new “Pilgrims Trail” similar to the Patriots trail in Boston USA with marked yellow footsteps leading from the station to the River and up through the historic heart of the town.

22.5 There is a need to make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

22.6 There is a need to help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to RHS Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently bypass Guildford to go to Bath, Oxford or Cambridge instead.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I OBJECT TO POLICY E6 (LEISURE AND VISITOR EXPERIENCE):

• Danger of over development: success doesn’t depend on building “attractions” which can harm heritage and rural settings. No case made for creating new ones.
• No policy of opposing reduction in rural hotel capacity.
• No definition of what added value interventions by Council can make to normal visitor market mechanisms.
• No policy of supporting Guildford countryside as its prime leisure and visitor asset, whose value rises as London gets bigger and busier.
• No vision of what the ideal visitor experience of the borough actually is and how to support its various elements.

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POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor "attractions" and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/"Disneyfication". Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many "leisure and visitor attractions" already. The case for creating more is not made and no examples are given. Instead, the plan's explicit priorities should be:

1. To protect the borough's prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

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3. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan, yet just a short walk from the new opera house).

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- To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

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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:** PSLPP16/2008  **Respondent:** 15256833 / C J Vickers  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**1. POLICY E6 - The leisure and visitor experience**

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

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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: PSLPP16/2277  Respondent: 15275009 / Compton Parish Council (Fiona Curtis)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We object to policy E6 the leisure and visitor experience. We believe that the importance of a visitor attraction hub could be much better articulated. Guildford has great potential to become a “must see” destination for tourists and visitors. Surrounded by the natural beauty of the Surrey Hills, it is already distinguished as an historic county town. The historic part of the town should be exploited to the full creating a real sense of vibrancy and atmosphere. This should be linked to the attractions of the Museum, the Castle, the Wey and the historic High Street including its views of the Hogs Back. The economic impact would create big advantages for both the leisure and the niche speciality retail sectors in the town. Given the local and wider catchment of the town Guildford should strive for high quality definition making it a great centre for people to live in and visit. Guildford the historic “Gateway to the Surrey Hills” has far more potential than Guildford just any other stereotypical centre found anywhere around London. Re-branding walks, such as a new “Pilgrims Trail” similar to the Patriots trail in Boston USA with marked yellow footsteps leading from the station to the River and up through the historic heart of the town.

There is a need to make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms. There is a need to help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Watts Gallery or Wisley Gardens and a National Trust property and a SouthWest Trains
travelcard for a day out in London) would be highly attractive to many European visitors who currently bypass Guildford to go to Bath, Oxford or Cambridge instead.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/18683  **Respondent:** 15278465 / Chris Wright  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

1. **POLICY E6 - The leisure and visitor experience**

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

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- To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly. I’d be grateful if you could confirm by return safe receipt of this objection.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/2397  **Respondent:** 15280321 / Sport England (Owen Neal)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E6
Sport England welcomes the council’s objective of increasing the contribution that tourism, arts, cultural heritage and sport make to their local community’s quality of life, social and cultural well being.

Further, Sport England supports the policy which protects against the loss of indoor sports venues unless replacement facilities of equivalent or better standard and provision is proposed in a location accessible to the facility’s current catchment area; or robust evidence demonstrates that the facility causes significant detriment to the amenity of the locality or that:

- there is no longer a need for the existing facility or an alternative leisure or visitor use; and
- the existing use is unviable and its retention has been fully explored (including through marketing the facility for alternative leisure or visitor use for a continued period of at least 18 months).

Sport England would like to see outdoor sports facilities specifically covered within Policy E6 or have a separate policy. Outdoor sports facilities and indoor sports facilities are given equal protection from development under paragraph 74 of the National Planning Policy Framework. The current phrasing of Policy E6 which applies to “existing leisure attractions” is ambiguous and further clarity should be provided. Sport England therefore objects to Policy E6.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10956  Respondent: 15282625 / Kelly Graves  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( No )

I OBJECT TO POLICY E6 (LEISURE AND VISITOR EXPERIENCE):

- Danger of overdevelopment: success doesn’t depend on building “attractions” which can harm heritage and rural settings. No case made for creating new ones.
- No policy of opposing reduction in rural hotel capacity.
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- No policy of supporting Guildford countryside as its prime leisure and visitor asset, whose value rises as London gets bigger and busier.
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Comment ID: PSLPP16/2584  Respondent: 15285121 / Audrey Boughton  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

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Attached documents:

Comment ID: PSLPP16/2599  Respondent: 15285345 / Mike Boughton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

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Comment ID: PSLPP16/2693  Respondent: 15295809 / David Lees  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Plan's approach to leisure and visitor experience.

Guildford has many "leisure and visitor attractions" already. The case for creating more is not made in the Plan and no examples are given. The borough's prime leisure and tourism asset, its countryside, needs to be protected from inappropriate development. The presumption in favour of development would lead to overdevelopment, and heritage sites and the Green Belt are particularly vulnerable to harm.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2773  Respondent: 15298017 / Margaret Cousins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

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I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

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: PSLPP16/14223  Respondent: 15299201 / Samira Abdullah  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to policy E6 the leisure and visitor experience. I believe that the importance of a visitor attraction hub could be much better articulated. Guildford has great potential to become a “must see” destination for tourists and visitors. Surrounded by the natural beauty of the Surrey Hills, it is already distinguished as an historic county town. The historic part of the town should be exploited to the full creating a real sense of vibrancy and atmosphere. This should be linked to the attractions of the Museum, the Castle, the Wey and the historic High Street including its views of the Hogs Back.

The economic impact would create big advantages for both the leisure and the niche speciality retail sectors in the town. Given the local and wider catchment of the town Guildford should strive for high quality definition making it a great centre for people to live in and visit. Guildford the historic “Gateway to the Surrey Hills” has far more potential than Guildford just any other stereotypical centre found anywhere around London. Re-branding walks, such as a new “Pilgrims Trail” similar to the Patriots trail in Boston USA with marked yellow footsteps leading from the station to the River and up through the historic heart of the town. There is a need to make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms. There is a need to help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to RHS Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently bypass Guildford to go to Bath, Oxford or Cambridge instead.

THE TOWN CENTRE OPPORTUNITY
I do not consider that the target of 1,172 homes in the town centre takes account of the need and demand for housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town which will in itself help to sustain the retail core by increased economic impact. What the town centre needs in terms of urban regeneration and to attain a thriving night time economy is more residential development. The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015. The reality is that the Town Centre and other areas of brownfield in the borough has the capacity to provide significantly more than this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2829  Respondent: 15299425 / Tim and June Yorath  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
POLICY E6 - The leisure and visitor experience

We object to this policy.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature.

Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

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POLICY E7 Guildford Town Centre

We object to this policy.

1 The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. We suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

2 There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

3 There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

4 The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

5 The policy also fails to provide guidance on design requirements, as required by the NPPF.

6 The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers.

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Attached documents:

Comment ID: PSLPP16/3028  Respondent: 15304929 / Rosemary Wood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

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 POLICY E6 - The leisure and visitor experience

- Danger of overdevelopment: success doesn’t depend on building “attractions” which can harm heritage and rural settings. No case made for creating new ones.
- No policy of opposing reduction in rural hotel capacity.
- No definition of what added value interventions by Council can make to normal visitor market mechanisms.
- No policy of supporting Guildford countryside as its prime leisure and visitor asset, whose value rises as London gets bigger and busier.
- No vision of what the ideal visitor experience of the borough actually is and how to support its various elements.

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Attached documents:

Comment ID: PSLPP16/3756  Respondent: 15345281 / Alexandra Murphy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

I conclude by adding I realize I am lucky to live here and can see why many would want to do the same. But unrealistic and overly ambitious development destroys the very elements that make Clandon and neighbouring settlements special. Surrey has few real villages left so why not preserve rather than blight them?

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Attached documents:

Comment ID: PSLPP16/4172   Respondent: 15356801 / Clare Harlow   Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

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Attached documents:

Comment ID: PSLPP16/4442  Respondent: 15368129 / Sharon Cork  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY E6

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

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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: PSLPP16/4553  Respondent: 15368993 / Tessa Spink  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?
POLICY E6 The leisure and visitor experience

GROUNDS FOR OBJECTION Tourism and visitors do not depend on new visitor “attractions”. Overdevelopment of countryside is a risk.

Surrounded by the natural beauty of the Surrey Hills, Guildford is distinguished as an historic county town. The historic part of the town should be exploited to the full creating a real sense of vibrancy and atmosphere. This should be linked to the attractions of the Museum, the Castle, the Wey and the historic High Street including its views of the Hogs Back. Guildford would be wise to model itself on other historic towns like Bath, Chester and York. The economic impact would create big advantages for both the leisure and the niche speciality retail sectors in the town.

Guildford the historic “Gateway to the Surrey Hills” has far more potential than Guildford being a stereotypical centre found anywhere around London. The countryside can offer high quality tourism – including cycling, National Trust sites, open countryside and cultural events including theatre and opera – which is lucrative. This is not recognised fully.

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Comment ID: PSLPP16/4970  Respondent: 15381249 / Helen Poyntz  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

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Attached documents:

Comment ID: PSLPP16/5017  Respondent:  15382529 / Reuben Lee  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

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I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

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Attached documents:

Comment ID: PSLPP16/5142  Respondent:  15386017 / Gareth Sinnett  Agent:
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Comment ID: PSLPP16/5321  Respondent: 15389697 / Oliver Stewart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

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<th>Respondent: 15390401 / William Stewart</th>
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4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

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: PSLPP16/5485    Respondent: 15398657 / Kim Roberts    Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY E6

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/"Disneyfication". Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

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Attached documents:

Comment ID: PSLPP16/16722  Respondent: 15411457 / Emily Beynon  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

As I see it, it is the task of the council to protect the environment for its residents, not facilitate the cruel scarring and destruction of the kind of the beautiful landscape and lifestyle that makes our borough desirable as a tourist and visitor destination. Before you vote on this proposal, please visit our village to see with your own eyes how profoundly ill-considered these proposals are!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6021  Respondent: 15420833 / Marjorie Moss  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to Policy E6 - The leisure and visitor experience.

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Attached documents:

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Comment ID: PSLPP16/6051  Respondent: 15422145 / Orlando Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16856  Respondent: 15422145 / Orlando Lee  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

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: PSLPP16/6074  
Respondent: 15422529 / David Roberts  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY E6

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Attached documents:

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Comment ID: PSLPP16/6312  Respondent: 15428097 / Bridget McClellan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

LEISURE AND VISITOR EXPERIENCE. Policy E6
I OBJECT to this policy, the Guildford area does not need "new" attractions, the whole point of the attraction of Guildford is its historic nature and quirkiness. The countryside, purely as it is, in its natural state is a big tourist attraction, to add "attractions" is completely missing the point, the countryside is what people want to enjoy, not a huge concrete car park.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6331  Respondent: 15428225 / Vian Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

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: PSLPP16/6582  Respondent: 15434241 / Valerie Sowerby  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6789  Respondent: 15438945 / Jacqueline Davies  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6
I object to POLICY E6 - The leisure and visitor experience

- Danger of overdevelopment: success doesn’t depend on building “attractions” which can harm heritage and rural settings. No case made for creating new ones.
- No policy of opposing reduction in rural hotel capacity.
- No definition of what added value interventions by Council can make to normal visitor market mechanisms.
- No policy of supporting Guildford countryside as its prime leisure and visitor asset, whose value rises as London gets bigger and busier.
- No vision of what the ideal visitor experience of the borough actually is and how to support its various elements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7075 Respondent: 15442049 / Ellouise Fassom Agent:

I OBJECT to Policy E6 - The leisure and visitor experience.

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4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLP16/7076  Respondent: 15442081 / Lauren Fassom  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

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I OBJECT TO POLICY E6 (LEISURE AND VISITOR EXPERIENCE):

• Danger of overdevelopment: success doesn’t depend on building “attractions” which can harm heritage and rural settings. No case made for creating new ones.
• No policy of opposing reduction in rural hotel capacity.
• No definition of what added value interventions by Council can make to normal visitor market mechanisms.
• No policy of supporting Guildford countryside as its prime leisure and visitor asset, whose value rises as London gets bigger and busier.
• No vision of what the ideal visitor experience of the borough actually is and how to support its various elements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7446  Respondent: 15448321 / Nicole Mapplebeck  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7727  Respondent: 15451713 / Gaby Attwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY E6 - The leisure and visitor experience

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7746  Respondent: 15451905 / Jonathan Withers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

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Attached documents:

Comment ID: PSLPP16/7765  Respondent: 15451969 / Rosie Lee  Agent:

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Attached documents:

Comment ID: PSLPP16/8265  Respondent: 15462785 / Thomas McMinn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

20. POLICY E6 - The leisure and visitor experience

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I trust the objections made above are fully considered and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
18. POLICY E6

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18. POLICY E6

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

- To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.
- To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourism. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
- To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.
- To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT TO POLICY E6 (LEISURE AND VISITOR EXPERIENCE):

- Danger of overdevelopment: success doesn't depend on building "attractions" which can harm heritage and rural settings. No case made for creating new ones.
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- No policy of supporting Guildford countryside as its prime leisure and visitor asset, whose value rises as London gets bigger and busier.
- No vision of what the ideal visitor experience of the borough actually is and how to support its various elements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8538  Respondent: 15469249 / Daniel Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY E6 - The leisure and visitor experience

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I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

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Attached documents:

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Comment ID: PSLPP16/8933  Respondent: 15478017 / Kirstie Pankhurst  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY E6 (LEISURE AND VISITOR EXPERIENCE):
• Danger of overdevelopment: success doesn’t depend on building "attractions" which can harm heritage and rural settings. No case made for creating new ones.
• No policy of opposing reduction in rural hotel capacity.
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• No policy of supporting Guildford countryside as its prime leisure and visitor asset, whose value rises as London gets bigger and busier.
• No vision of what the ideal visitor experience of the borough actually is and how to support its various elements.

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Attached documents:

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Comment ID: PSLPP16/9044  Respondent: 15478177 / Michelle Brown  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

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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: PSLPP16/15907  Respondent: 15478209 / Sally Daboo  Agent: 15478209

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

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: PSLPP16/9359  Respondent: 15481409 / Amy F Corstin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

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Attached documents:

Comment ID: PSLPP16/9517  Respondent: 15482817 / C.E. Pullen  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Leisure and Visitor Experience

The area is already recognised as a tourist area and should be encouraged.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Attached documents:

Comment ID: PSLPP16/10682  Respondent: 15502209 / Shirley Atkinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

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Attached documents:

Comment ID: PSLPP16/10681  Respondent: 15502241 / Richard Atkinson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

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: PSLPP16/11081  Respondent: 15509057 / Richard Golding  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

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Attached documents:

Comment ID: PSLPP16/11270  Respondent: 15570145 / Owen Eszeki  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

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Policy E6 - Leisure and Visitor Experience

The area is already recognised as a tourist area and should be encouraged.

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Attached documents:

Comment ID: PSLPP16/11268  Respondent: 15570209 / Emily Cross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

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Attached documents:

Comment ID: PSLPP16/15351  Respondent: 15570817 / Tom Edelsten  Agent:
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Attached documents:

Comment ID: PSLPP16/11451  Respondent: 15571425 / Monika Neczaj  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY E6 (LEISURE AND VISITOR EXPERIENCE):

• Danger of overdevelopment: success doesn’t depend on building “attractions” which can harm heritage and rural settings. No case made for creating new ones.
• No policy of opposing reduction in rural hotel capacity.
• No definition of what added value interventions by Council can make to normal visitor market mechanisms.
• No policy of supporting Guildford countryside as its prime leisure and visitor asset, whose value rises as London gets bigger and busier.
• No vision of what the ideal visitor experience of the borough actually is and how to support its various elements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11520  Respondent: 15571617 / Bruce Garbutt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

• I object to the leisure and visitor experience policy – Policy E6

• Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands

• In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment or “Disneyfication”.
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Attached documents:
POLICY E6 - The leisure and visitor experience

I object to this policy. The policy should acknowledge that much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly, the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example, the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attraction. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

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Comment ID: PSLPP16/11755  Respondent: 15574337 / Jacqueline Redknap  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

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Comment ID: PSLPP16/11858  Respondent: 15575009 / Tony Redknap  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6
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I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

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<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/12273</th>
<th>Respondent: 15581665 / Laura Daboo</th>
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<tbody>
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Comment ID: PSLPP16/12276  Respondent: 15581761 / Peter Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

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Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development.
2. To improve Guildford’s river.
3. To help private providers market local tourism for example helping to co-ordinate tourism packages under a distinctive brand.

To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/12738  **Respondent:** 15585441 / Laurie Will  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

20. POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

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The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

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**POLICY E6 LEISURE AND VISITOR EXPERIENCE**

I object to policy E6 the leisure and visitor experience. I believe that the importance of a visitor attraction hub could be much better articulated. Guildford has great potential to become a ‘must see’ destination for tourists and visitors. Surrounded by the natural beauty of the Surrey Hills, it is already distinguished as an historic county town. The historic part of the town should be exploited to the full creating a real sense of vibrancy and atmosphere. This should be linked to the attractions of the Museum, the Castle, the Wey and the historic High Street including its views of the Hogs Back.

The economic impact would create big advantages for both the leisure and the niche speciality retail sectors in the town. Given the local and wider catchment of the town Guildford should strive for high quality definition making it a great centre for people to live in and visit.

Guildford the historic ‘Gateway to the Surrey Hills’ has far more potential than Guildford just any other stereotypical centre found anywhere around London. Re-branding walks, such as a new ‘Pilgrims Trail’ similar to the Patriots trail in Boston USA with marked yellow footsteps leading from the station to the River and up through the historic heart of the town.

There is a need to make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

There is a need to help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An ‘English town break’ (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to RHS Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently bypass Guildford to go to Bath, Oxford or Cambridge instead.

**THE TOWN CENTRE OPPORTUNITY**

I do not consider that the target of 1,172 homes in the town centre takes account of the need and demand for housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town which will in itself help to sustain the retail core by increased economic impact. What the town centre needs in terms of urban regeneration and to attain a thriving night time economy is more residential development.

The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015. The reality is that the Town Centre and other areas of brownfield in the borough has the capacity to provide significantly more than this.

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Attached documents:

Comment ID: PSLPP16/13265  Respondent: 15588929 / Alex Hutchings  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY E6

I OBJECT to Policy E6 - The leisure and visitor experience.

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Attached documents:

Comment ID: PSLPP16/13475  Respondent: 15590593 / Johnathan Page  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

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: PSLPP16/13813  Respondent: 15595681 / Willemien Downes  Agent: 

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Attached documents:

Comment ID: PSLPP16/14069  Respondent: 15601057 / Chris Vinall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

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3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14219  Respondent: 15601473 / Joseph Fort  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

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4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14267  Respondent: 15601953 / Stephen Yandle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- Danger of overdevelopment: success doesn’t depend on building “attractions” which can harm heritage and rural settings. No case made for creating new ones.
- No policy of opposing reduction in rural hotel capacity.
- No definition of what added value interventions by Council can make to normal visitor market mechanisms.
- No policy of supporting Guildford countryside as its prime leisure and visitor asset, whose value rises as London gets bigger and busier.
- No vision of what the ideal visitor experience of the borough actually is and how to support its various elements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14331  Respondent: 15602177 / Julia Hunt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to policy E6 the leisure and visitor experience. I believe that the importance of a visitor attraction hub could be much better articulated. Guildford has great potential to become a “must see” destination for tourists and visitors. Surrounded by the natural beauty of the Surrey Hills, it is already distinguished as an historic county town. The historic part of the town should be exploited to the full creating a real sense of vibrancy and atmosphere. This should be linked to the attractions of the Museum, the Castle, the Wey and the historic High Street including its views of the Hogs Back.
The economic impact would create big advantages for both the leisure and the niche speciality retail sectors in the town. Given the local and wider catchment of the town Guildford should strive for high quality definition making it a great centre for people to live in and visit. Guildford the historic “Gateway to the Surrey Hills” has far more potential than Guildford just any other stereotypical centre found anywhere around London. Re-branding walks, such as a new “Pilgrims Trail” similar to the Patriots trail in Boston USA with marked yellow footsteps leading from the station to the River and up through the historic heart of the town. There is a need to make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms. There is a need to help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to RHS Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently bypass Guildford to go to Bath, Oxford or Cambridge instead. THE TOWN CENTRE OPPORTUNITY! do not consider that the target of 1,172 homes in the town centre takes account of the need and demand for housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town which will in itself help to sustain the retail core by increased economic impact. What the town centre needs in terms of urban regeneration and to attain a thriving night time economy is more residential development. The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015. The reality is that the Town Centre and other areas of brownfield in the borough has the capacity to provide significantly more than this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16275  Respondent: 15603361 / Ann Watkins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY E6 (LEISURE AND VISITOR EXPERIENCE): • Danger of overdevelopment: success doesn’t depend on building “attractions” which can harm heritage and rural settings. No case made for creating new ones. • No policy of opposing reduction in rural hotel capacity. • No definition of what added value interventions by Council can make to normal visitor market mechanisms. • No policy of supporting Guildford countryside as its prime leisure and visitor asset, whose value rises as London gets bigger and busier. • No vision of what the ideal visitor experience of the borough actually is and how to support its various elements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14562  Respondent: 15603489 / Simon Pitt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

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4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14825    Respondent: 15607553 / Penelope Gillmore    Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14884  Respondent: 15608289 / Olivia Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

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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: PSLPP16/14902  Respondent: 15608545 / Madeleine Ringshaw  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

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Attached documents:

Comment ID: PSLPP16/15219  Respondent: 15610785 / Liz Vinall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for over-development. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already and West Clandon already sees regular visits from Inner London schools training for Duke of Edinburgh awards and from Ramblers. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16579  Respondent: 15610913 / Gillian Hague  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for over-development. Heritage sites and the Green Belt are particularly vulnerable to harm.

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4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15354  Respondent: 15612481 / Gillian Culmer  Agent:
I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

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• No policy of supporting Guildford countryside as its prime leisure and visitor asset, whose value rises as London gets bigger and busier.
• No vision of what the ideal visitor experience of the borough actually is and how to support its various elements.

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Attached documents:

Comment ID: PSLPP16/15493  Respondent: 15615745 / Nicholas Thompson  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

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Attached documents:

Comment ID: PSLPP16/15647  Respondent: 15618305 / Lawrence Claridge  Agent:
Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

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The economic impact would create big advantages for both the leisure and the niche speciality retail sectors in the town. Given the local and wider catchment of the town Guildford should strive for high quality definition making it a great centre for people to live in and visit. Guildford the historic “Gateway to the Surrey Hills” has far more potential than Guildford just any other stereotypical centre found anywhere around London. Re-branding walks, such as a new “Pilgrims Trail” similar to the Patriots trail in Boston USA with marked yellow footsteps leading from the station to the River and up through the historic heart of the town. There is a need to make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms. There is a need to help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to RHS Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently bypass Guildford to go to Bath, Oxford or Cambridge instead. THE TOWN CENTRE OPPORTUNITY I do not consider that the target of 1,172 homes in the town centre takes account of the need and demand for housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town which will in itself help to sustain the retail core by increased economic impact. What the town centre needs in terms of urban regeneration and to attain a thriving night time economy is more residential development. The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015. The reality is that the Town Centre and other areas of brownfield in the borough has the capacity to provide significantly more than this.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16339  Respondent: 15640897 / Jackie van Heesewijk  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY E6 (LEISURE AND VISITOR EXPERIENCE): • Danger of overdevelopment: success doesn’t depend on building “attractions” which can harm heritage and rural settings. No case made for creating new ones. • No policy of opposing reduction in rural hotel capacity. • No definition of what added value interventions by Council can make to normal visitor market mechanisms. • No policy of supporting Guildford countryside as its prime leisure and visitor asset, whose value rises as London gets bigger and busier. • No vision of what the ideal visitor experience of the borough actually is and how to support its various elements.

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Attached documents:

Comment ID: PSLPP16/16772  Respondent: 15650369 / Stephanie Dean  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6
**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**POLICY E6 - The leisure and visitor experience**

I **object** to this policy. The policy should acknowledge that much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly, the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example, the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attraction. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

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**Attached documents:**

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Attached documents:
The NRA consider the wording of Policy E6 is correctly supportive for the Borough’s future leisure and visitor experience and is pleased to see the provision of new and enhanced leisure and visitor attractions and the provision of new and improved accommodation and conference facilities for tourist and business visitors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17395  Respondent: 15682465 / Nick Beesly  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Economic Policies: I am in support of Policy E1 "Sustainable employment" but believe that Policy E2 "Location for new employment floorspace" fails to realise that Guildford Town Centre is relatively insignificant in economic value added terms. The University Quarter provides three times as much economic gross value added as the Town Centre yet is prejudiced by this policy. I am supportive of Policy E4 "Surrey Research Park", Policy E5 "Rural Economy" and Policy E6 "The leisure and visitor experience" but caution that Policy E7 "Guildford Town Centre" could lead to overdevelopment of the Town Centre.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17608  Respondent: 15688481 / Sally Lescher  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to Plan Policy P6: The leisure and visitor experience
This policy disregards the natural environment, a key asset of the Guildford countryside which is valued by walkers,
riders, cyclists and others from across Surrey. Tourism and visitors do not depend on new visitor attractions and facilities.
It is outrageous for Guildford to propose greater use of the River Wey as a “leisure and recreational resource.” The River
Wey is critical for water supply and biodiversity; it is a shared resource which is neither owned by nor the responsibility
of Guildford alone. This policy is at odds with (i) Policy I4 Green & Blue Infrastructure which states that “waterways
will be protected and enhanced”. (ii) Policy P4 Flooding, flood risk and groundwater source production.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPP16/15564  Respondent: 15977889 / Charles Kimpton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

OBJECT. Tourism does not depend on ‘attractions’ – the rural nature of Guildford should be preserved and promoted like
Chester & York

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: pslp171/714  Respondent: 17302113 / Helen Owlett  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E6
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

As a frequent performer at the Electric Theatre, it has been brought to my attention that the venue is not mentioned in the
local plan, whereas Yvonne Arnaud and GLive are. The future of the Electric Theatre needs protecting and should be
included as a cultural asset to life 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: pslp171/940  Respondent: 17321473 / ACM (Oli Sussat)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E6
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )
It would be really nice to have The Electric Theatre recognised in section 4.4.54 of E6, alongside G Live and The Yvonne Arnaud. Especially as it continues to be a Council owned venue that we have pledged to operate for you for the next 20 years. Thanks for any consideration you can give this request.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Part 3 of Policy E6 provides something of a catch-all approach to the protection of leisure and cultural facilities, including arts venues, entertainment venues, hotels and indoor sports venues. This approach fails to take account of the unique characteristics of the discreet uses that have been grouped together in the policy.

Hotels function across a wider geographical area than the Borough as is demonstrated by the Council's Evidence base. The Surrey Hotel Futures Report addresses the sector across the entire County and the need or otherwise for a hotel to be retained should be based on a similar analysis and not restricted to the geographical boundaries of the Borough.

The policy effectively requires that a replacement facility be provided in order to facilitate the loss or redevelopment of an existing hotel. However, this approach assumes that a duplicate facility is necessary and fails to take into consideration the existing provision across either the Borough or County. Where sufficient capacity exists, a replacement facility should not be required. The approach set out in the policy is not supported by the evidence base.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

The policy should be amended as follows:

(3) The loss of existing visitor, leisure and cultural attractions, including arts and entertainment facilities, hotels and indoor sports venues, will be strongly resisted unless it can be demonstrated that sufficient alternative capacity of an equivalent or better standard is in place or could be provided. Alternatively, robust evidence must be provided that demonstrates that the facility causes significant detriment to the amenity of the locality or that:

(a) there is no longer a need for the existing facility or an alternative leisure or visitor use; and

(b) the existing use is unviable and its retention has been fully explored (including active and comprehensivethrough marketing the facility for its existing and alternative leisure or visitor use for a continued period of at least 18 months prior to submission of a planning application).

Attached documents:
Policy E6 relates to ‘The leisure and visitor experience’. Criterion (3) relates to The loss of existing visitor, leisure and cultural attractions, including hotels, and confirms that the loss of hotels would only be supported where, a - there is no longer a need for the existing facility or an alternative leisure or visitor use; and, b - the existing use is unviable and its retention has been fully explored (including active and comprehensive through marketing the facility for its existing and alternative leisure or visitor use for a continued period of at least 18 months prior to submission of a planning application).

Whilst it is acknowledged that a policy of this nature is generally required within plans, it is considered that the 18-month period specified for marketing, in order to demonstrate that a use is unviable, is unnecessarily onerous and not in keeping with National Policy relating to the need to regularly review land allocations, and to have regard to market signals in determining applications to alternative uses of land. A figure of between 6 – 12 months would be considered more appropriate to demonstrate an unviable use.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1596  Respondent: 17406209 / Guildford Vision Group (Andrew Black)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY E6 - The Leisure and Visitor Experience

3.40 The introduction to policy E6 sets out the aspirations of GBC for leisure and visitor experience and at paragraph 4.4.56 text has been added to state that:

*The Local Plan aspires to improve and diversify the leisure and visitor experience in the borough. Stimulating vibrant town and district centres, encouraging the provision of additional visitor and business accommodation in appropriate locations, protecting our special natural landscapes and preserving our historic built environment will be important to achieving this. GVG wholeheartedly agrees with this statement of intent from GBC but this.*

3.41 underlines the importance for a more co-ordinated approach to the development of the town centre than is currently being planned for under the draft document.

3.42 It is recognised that retailing is undergoing a major transition and complementary leisure experiences are essential in order to extend dwell times. Guildford is clearly well placed to bring forward the River Wey navigation as a visitor experience, complementing amenities such as the Castle, Sports Centres, and surrounding Green Belt. The introduction of pedestrianisation and removal of traffic from the town centre, which are not provided for in the Plan, can produce additional benefits.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1641  Respondent: 17408865 / Jessica Ferguson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
POLICY E6

5. The ‘Summary of Key Changes to the Proposed Submission Local Plan’ states in respect of Policy E6 that changes are made to create “…increased flexibility in terms of locational requirements for self-contained hotels.” However, no substantive change has been made to the policy to achieve this. Rather, changes to the policy and supporting text relate primarily to ensuring that new leisure and visitor experience development preserves the local landscape and heritage assets.

6. There is clear recognition that many of the Borough’s leisure and cultural visitor attractions are rural. Indeed, part (1)(c) of the Policy supports “sustainable rural tourism and leisure developments that benefit businesses, communities and visitors in rural areas” as long as they meet certain criteria. However, new accommodation and conference facilities in these locations could be stymied by the need to comply with the sequential test (ie, as required by part (1)(b), despite there being local demand arising from those leisure and cultural visitor attractions themselves.

7. Greater flexibility (or at the very least, improved guidance) is required in respect of the sequential test relating to rural leisure and visitor facilities so that needs can be met in situ and unsustainable behaviour avoided. Indeed, the NPPG recognises that in some situations, the sequential test may result in undesirable outcomes by failing to recognise the specific market and locational requirements of certain main town centre uses, as defined at Annex 2 of the NPPF.

8. In respect of part (2), a clear definition of “proposals for new leisure space….“ is required so that promoters understand whether their particular proposal will be subjected to an impact test. Otherwise, the policies is imprecise.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Total records: 414.
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

Document part: Policy E7 - Guildford Town Centre
Policy E7: Guildford Town Centre

“a new retail-led, mixed-use development of 45,000 sq m (gross) of additional comparison goods floorspace on the North Street regeneration site within its primary shopping area.”

We question the wisdom of expanding retail floor space on this scale given the demand from competing priorities in our constrained town and given the need to ensure resilience for the high street in the face of trends in retailing.

“approximately 1,172 new homes, particularly on upper floors as part of mixed use developments;”

Homes should not be confined to upper floors and care needs to be taken to ensure development heights are stepped to reflect the rise of the land. Extensive residential storeys, all on one level on top of large retail units, should be avoided.

Vision

The objective of giving pedestrians priority needs to be qualified. The extent of pedestrian areas needs to be tempered by the reality that Guildford is a crossing point in the downs and that its geography is not amenable to a ring road strategy that normally accompanies extensive pedestrianisation. If central roads are closed to through traffic, vehicles will be displaced to more residential and rural roads with unacceptable consequences. Further, steep slopes mean there is a requirement for access to transport along the length of the main shopping streets to help those who cannot cope with the gradients. This means you cannot adopt an approach of bus stops around the periphery of the retail area with no central interchange.

Object: See comments on questions 1 and 3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
harmful effect. The retail element should be reduced further, shops developed along North Street, a bus interchange retained and the potential for some flexible high tech business space considered.

Our previously stated concerns stand.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/11417  **Respondent:** 8559297 / Holy Trinity Amenity Group (Robert Bromham)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**E7. Guildford Town Centre.** P85.

The 45,000sqm of retail (comparison) shopping proposed for the N Street site is too much. The priority need is for more residential use.

In addition it is essential to increase day to day convenience-shopping in the centre for residents like us who have nowhere to do this shopping except the centre – unless we drive out of our area. The decline in convenience and service shopping facilities continues, despite the arrival of Waitrose.

We do not wish to see evening and night-time activities located along the immediate riverside. This would require railing in of the river for safety purposes, and provisions made to safeguard clients during a flood event when the area can be quite frightening. The genuine attractive and green riverside, with its green banks and important biodiversity would be lost. There is no objection to such activities in the area providing they have a reasonable set back from the river and are outside of the flood zone.

There is concern about promoting additional “active” use of the riverside and river. The river is a comparatively narrow navigation, and does not have the capacity to take more boating activity than at present. The attractive towpath is already well used by walkers, runners and cyclists. Commercialisation would degrade the riverside as a key asset of the town.

While supporting the intent behind the banning of new food takeaways within 500m of schools we question whether this is practical. There are a number of schools close to the centre including the RGS and Pewley Down Infants, and this rule would ban takeaways from much of the centre.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP17/1853  **Respondent:** 8561377 / The Guildford Society (Julian Lyon)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**POLICY E7 – Guildford Town Centre**
At Policy E7 – Guildford Town Centre we consider the retail amounts are wrong and relate only to the North Street site rather than the town centre as a whole.

a) Guildford has traditionally been a market town with a prosperous commuting labour force. This has changed in the last few decades and retail only employs around 10% of the labour force compared with professional services over three times that. The GVA from professional services employees averages out at around £75,000 pa compared with retail GVA on an equivalent basis of less than £25,000.

b) This has important planning implications in determining which areas are most important for development, what housing and infrastructure requirements need to be met. The current emphasis on retail development needs to be reconsidered in view of these changing needs, with greater emphasis on the cluster of high-value activities around the University Research Park and hospital. Housing, especially for skilled workers, should have a higher priority over retail development.

cccc) We strongly welcome the inclusion at 4.4.54 of the phrase: ‘The historic built environment also significantly contributes to Guildford’s appeal.’ We would like the Council to add reference here to the setting in a gap in the North Downs, and to the importance of cross-town views.

dddd) The Society is very disappointed that the Vision (between 4.4.72 and 4.4.73) has been deleted – albeit parts of the vision do appear elsewhere. This was a fine statement of intent and the additional words in 4.4.74 do not adequately compensate for its loss. Not only should it be retained, but the Vision should also include the new strategic infrastructure necessary for the good functioning of the town – especially the future of the gyratory and bus interchange provision. We would advocate the new bridge proposed by Guildford Vision Group.

eeee) The Society is also devastated to see the removal of the part of Policy E7 that calls for ‘more varied uses during the evening and night time, including along the riverside, with residents and visitors feeling safe; active use of the riverside and the river; more effective routes within and across the town centre for pedestrians and cyclists; new public squares and other informal meeting areas.’ We request that these aspirations be reinstated as part of Policy E7.

ffff) We do, however, agree with the added wording at paragraph 4.4.74 although it does not by itself make up for the loss referred to above.

gggg) At least some of the deleted paragraph 4.4.86 should be reinstated as an indication of intent. We recommend rewording rather than deleting 4.4.86 as follows: “River flooding risk is currently a significant constraint in redeveloping Guildford town centre. Several prominent riverside sites that have no building footprint cannot be allocated for redevelopment because of river flooding without a comprehensive plan to try to resolve these flooding issues, including technical solutions to remove the sites from the floodplain.”

hhhh) Under Monitoring Factors, there is a target for A1 Retail space and A3 Food and Beverage space of 41,000sqm and 6,000sqm respectively – exactly the same as the revised Policy A6 provision at North Street. This implies no other new A1 or A3 space anywhere else in the town centre for twenty years. Many of our members (including our Local Economy Group) believe that a major retail development at North Street should be rejected on the grounds of the scale of retail provision, where the Carter Jonas report seems to struggle to justify the quantum, and where there is a recognised need for more residential units. Planning decisions on this site, where the Local Planning Authority has a landed interest, should be made based on public benefits not commercial ones.

iiii) The Guildford Society is concerned for the future of retail, and is keen to point out the relatively poor contribution retail space makes to Gross Value Added (GVA) when compared to business space and residential accommodation. The use of GVA needs to be introduced to assist in determining better resource allocation, especially between housing versus retail development, and helping identify optimum locations.

jjjj) This Policy E7 should include a clause on the provision of employment floor space (see our comments on Policy E2(1) above). As it stands the plan is inconsistent here. There should also be a Monitoring Indicator for the amount of net employment floorspace provided.
The Guildford Society strongly believes that it is misguided to strike out the Allies & Morrison Vision and Town Centre Master Plan as Key Evidence, and to qualify the Town Centre Regeneration Strategy as carrying no weight. The result is that there is no strategic spatial evidence for this, the most important part of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: pslp171/2028</th>
<th>Respondent: 8561377 / The Guildford Society (Julian Lyon)</th>
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**ABSENCE OF TOWN CENTRE PLANNING**

Our first observation and comment, therefore, is about the absence of planning for a most critical part of the Borough’s infrastructure – Guildford Town Centre.

The Evidence Base is lacking in crucial detail and the plan is silent on most planning matters relating to the town centre. The Local Plan suggests 931 homes for an area of the town centre where the Guildford Vision Group has identified scope for 3,367 homes. The Local Plan allocates some sites, but is missing others. The almost complete absence of detail puts at risk the entire Local Plan – for instance (and by no means exhaustively):

- **how do we know what the town centre infrastructure can cope with when it already grinds to near-gridlock at peak hours?**
- **there is relatively little remedial traffic infrastructure proposed in the town centre**
- **we know from Council minutes that it is intended that the bus station will be relocated – Compulsory Purchase Order notices may well have been served by the time the Local Plan consultation draws to a close – and yet there is no reference to the potential impact of such a relocation on any of the settlements who rely on buses, nor for the propensity to introduce modal shift.**
- **on the basis the delivery of homes in the town centre is uncertain, how can we know whether the housing numbers in the remainder of the Borough are (a) correct; and (b) not going to overburden the fragile town centre infrastructure?**

Guildford Vision Group, a voluntary group of mostly retired professionals, in their own time and with very limited financial resources, have managed to develop a comprehensive growth-based town centre plan – largely in the face of apparent resistance (or at least obstruction) from the Borough Council. The Guildford Society is in broad support with the objectives and approach adopted by the Guildford Vision Group, and, consequently with its emerging plan. We recognise that there would be some need for reallocation of land uses, such as the displacement of Employment Land around Walnut Tree Close and Woodbridge Meadows, but these could easily be accommodated by commuting an equivalent amount of (low density) residential land near both of the proposed new railway stations for use for employment (in accordance with Policy E2)(1)(b)) in order to unlock higher density urban land for housing development.

Irrespective of whether the housing numbers are correct, this strategy would displace about 10Ha of employment land to one of the new urban extensions with proposed rail and bus connections, where housing would have been developed at circa 40dpH (dwellings per Hectare) and replace it in the northern section of the town centre with housing at a density of, say, 160dpH, leading to a potential reduction of the need for Green Belt development of around 30Ha. We recognise that this area may need to be safeguarded for a subsequent plan.

Clearly, failure to include an operable plan for the Town Centre (one that optimises land uses, can deliver assured development volumes and can resolve transport and traffic infrastructure shortcomings) represents a core and crucial missing element of the proposed submission Local Plan which, the Guildford Society fears, makes the whole Local Plan unsound.
This is a hugely disappointing example of the Council failing to understand the notion of efficient and effective spatial planning, and the need for clarity and plan-led regeneration of the town centre, despite the amount of effort put in by the community over many years.

(Refer to Diagrams on uploaded Rep)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2033  Respondent: 8561377 / The Guildford Society (Julian Lyon)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

RETAIL AND TOWN CENTRES - TOPIC PAPER (2017)

The Guildford Society largely recognises the context and content of this report. We are concerned that the Settlement Profiles Report is so poor that much of the retail hierarchy has been arrived at without the benefit of a solid local evidence base. The lists of retail centres (town centre, district and local) ignore key leisure facilities such as pubs and restaurants, omit out-of-town retail facilities like supermarkets and retail warehouses (several of which have automatic A1 use) – these two classes are major traffic generators and have been expressly excluded (4.26 and 4.27) – and fail to identify trade counters and motor dealerships in the retail mix. The retail and food and drink floorspace targeted in the local plan do not seem to bear much relationship to the tables in the Topic Paper and underlying evidence base. There is no reference to the relatively low GVA contribution made by retail uses relative to other economic activities. The long-term impact of internet is barely mentioned (although in the underlying paper by Carter Jonas, this is given as a key factor that would result in major changes to the forecast need). Very little attention is paid to the need to change focus from ‘retail and footfall’ to ‘retail and dwell time’. A fantastic town centre will be one of the best ways to ensure the success of our retail developments and businesses. The Madrid Road, Guildford Park local shopping centre is adversely affected by peak hours traffic, and delivery lorries are often parked up at peak hours, causing further traffic delays.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6179  Respondent: 8562273 / The Clandon Society (Christopher Dean)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY E7 Guildford Town Centre

We object to this policy.

1. The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. We suspect the Vision wording is effectively of little or any force. These principles should be explicit in the statement of policy.

2. There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development in, for example the Walnut Tree Close /Woodbridge...
Meadows area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the Plan period without harming the countryside.

3. There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

4. The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

5. The policy also fails to provide guidance on design requirements, as required by the NPPF.

6. The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. Above all, the retail development proposals must not damage the viability of the High Street.

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? ( No ), is Legally Compliant? ( )

The omission of the Town Centre Master Plan from the Local Plan invalidates much of the Plan, especially the impact on traffic. I understand that option 2 of the traffic re-routing exercise is favoured yet we have no details and this has not been included in the Highway Assessment. Whether option 1 or 2 are elected, there will be a knock-on impact to the suburbs and surrounding villages as reducing capacity whilst increasing footfall and traffic in a town that is already congested can do nothing but harm.

I do not consider that the target of 1,172 homes in the town centre takes account of the need and demand for housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town which will in itself help to sustain the retail core by increased economic impact. What the town centre needs in terms of urban regeneration and to attain a thriving night time economy is more residential development. The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015. The reality is that the Town Centre and other areas of brownfield in the borough has the capacity to provide significantly more than this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>E7</th>
<th>Guildford Town Centre</th>
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<tr>
<td>4.4.67</td>
<td>Guildford does not have good nighttime transport and hence this should say 'good day time transport'. The Town Centre Master Plan is pivotal to the plan as a whole and it should be included within the Local Plan.</td>
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| Object |

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<thead>
<tr>
<th>4.4.67</th>
<th>Removal of vision for the town</th>
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<tr>
<td>I object to the removal of a vision for the town. Reference is made to the Spatial Strategy, but this does not have a specific vision. It is also ominous to see that the 5 pillars that formed the basis of earlier incarnations of the plan have been replaced with 4 'core themes' and that development and sustainability have been replaced with 'economy'. Given that the economy is largely about development, sustainability appears to no longer have a place. As 'conservation and protection' are secondary in this plan the removal of 'sustainability' as a key component is of concern.</td>
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| Object |

| 4.4.86 | I hope the removal is because preventative measures will be put into place and / or development designed for floods is used. There is however no mention of either. |

| Comment |
The Regeneration Programme has not been consulted on, on the basis that it bears no weight, as it is purely aspirational. The projects included are far from aspirational as they cross over into other parts of the evidence base. A balance is needed between good design and appropriate levels of development and meeting needs as the majority of people would like to live in the town, close to amenities. The outcome falls short of this with the majority of new housing proposed for the countryside. The Regeneration programme should see all brownfield and urban sites (outside conservation areas) optimally developed. This must include more multi-storey car parks and increased density in certain areas. This would go a long way towards taking the pressure off the Greenbelt. This document should also be open to formal consultation and have input from all Councillors, not just the Executive.

Who are the internal and external stakeholders?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy E7

I object to this policy because it should be possible to build higher numbers of homes in the town centre than this. Amenities and infrastructure already exist and it is a very sustainable location. In an age of increasing internet use it would be sensible to reduce somewhat the retail and office elements and increase the residential element. It should also be possible, with good design, to have a modest increase in the height of buildings in this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17561  Respondent: 8581505 / Burpham Neighbourhood Forum (Jim Allen)  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The commercial side of the policy is also unsound as it fails to provide a rational approach to change in shopping habits of buying from the internet, with home delivery and collections of multiple parcels from central hubs.

The housing number needs to be consistent with all other documents and specifically the Town Centre Master Plan and Inclusion of Hotels to ensure other policies are achievable.

This policy fails to take ‘change of patterns’ into account.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2203  Respondent: 8581505 / Burpham Neighbourhood Forum (Jim Allen)  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

4.4.71

The first sentence irrelevant as it includes all time periods of the day. We welcome mention / acknowledgement of parking and traffic problems and request definition of ‘spatial vision’ and source of this document.

4.4.78

ONS 2014 projections are incorrect; overseas student numbers have been double counted.

4.4.83

Study 2014 is out of date.

4.4.68

The first two sentences of this statement should be left in. The statement is actually referring to flood zone 3b, where there should not be building in any respect. This should be accepted as a severe constraint within the Local Plan. We noting no constraint of any kind have been applied in this Plan, merely ‘Mitigation’ where it is known to cause potential damage will be done by the policy. The NPPG refers to essential infrastructure only. This does not cover business or domestic buildings. No attempt to build in Zone 3b should be supported by this Plan. The implication that the Council is
attempting to prevent flooding in a natural flood plain is worrying as speeding water through a natural river course will seriously erode the banks.

4.4.87
Guildford Town Centre regeneration strategy: the relationship between the TCRP and the LP statement should be defined here.
The GTCRP Document has not had scrutiny at Reg 18. It is unknown what ‘SPD’ means, and the relationship between it and the Local Plan and the GTCRP’s Aspirational Plan is unclear, as the regeneration strategy is unavailable to comment on.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12178  Respondent: 8582017 / The Clandon Society (J Wright)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher 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: PSLPP16/13518  Respondent: 8582977 / Guildford Environment Forum (John Bannister)  Agent:
POLICY E7

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

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The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Bullet point 1:** It is written: “A new retail-led, mixed-use development of 45,000 sq m (gross) of additional comparison goods floorspace on the North Street regeneration site within its primary shopping area”

This is based on a Retail Assessment which is weak, and based on flawed and dated concepts. It is apparent that shops are closing and online shopping is growing in popularity, while town centre shopping is decreasing.

The Assessment needs reviewing for soundness and whether the land in the proposed North St development area would now be better used to regenerate the town centre with mainly housing which would bring vibrancy to the town and contribute towards rather than compete with the High St.

**Bullet point 4:** The riverside needs to be carefully planned, so that it is not over-taken by over noisy night life which is magnified beside water. River banks and scenery should be kept as natural as possible. Environmental factors need to be considered as well as social and economic factors. (See comment on Policy E4 box, bullet point 4)

**Bullet point 7:** Care needs to be taken that modern built public squares are not windswept and isolated areas with no defined character. Long established squares usually have a focal point, such as a beautiful building, a church or town hall, and smaller squares are often surrounded by smaller old buildings of character. Large trees bring much character to a town and a large tree could be appropriate in a square.

Para. 4.4.89: The two scenarios in the Town Centre Masterplan (TCM) were not clearly outlined in the Masterplan, so their impacts were not apparent. Scenario 2 has been chosen and its impact on the High St, its setting, views and listed building need more analysis. Both scenarios depend on a very large reduction in traffic and were rated higher for bad traffic impacts than the present gyratory system in a separate traffic study.

The Town Centre Masterplan will depend on a round town bus service. As the town is pedestrianised and car parks accordingly are situated further from the centre and not necessarily near a venue to be visited. For those living in villages, distances to be walked on arriving in Guildford will be further, and to visit different locations and venues in the town, a ‘hop on, hop off’ bus will be essential. At present buses from the bus station at the bottom of North St (adjacent to the High St) carry people up the steep gradient of the High St and North St. An assessment is also needed on the impact of ‘pedestrianisation’ of the town centre on residential roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2458  Respondent: 8585601 / Jennie Kyte  Agent:  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY E7 Box  Guildford Town Centre

(a) The large amount of retail has been reduced by a comparatively small amount of 9% to 41,000 sq.m. Evidence as to the need for this amount of retail needs analysing carefully and the data used checked, particularly as retail is being adversely affected by the fast moving and increasing trend for online shopping. Consequently reports by consultants can be out of date.

I object to Policy E7 as further analysis on retail is needed

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
We object to this policy as we feel that more residential use should be made of the town centre. Independent research suggests a fall in demand for retail space – there is enough visible evidence of empty shops in High Streets – and no account seems to have been taken of the increase in online shopping.

The Guildford Retail and Leisure Study 25 September 2015 states “Town centres, once the principle focus for retail and leisure are now increasingly under threat.”

Proposing a 40% increase in retail space seems perverse; better surely to concentrate on high quality enterprise that reflects Guildford’s heritage and prioritise brownfield development for imaginative housing. This would take pressure off the Green Belt. The NPPF clearly states that Green Belt serves a key purpose, “to assist in urban regeneration, by encouraging the recycling of derelict land and other urban land.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

The focus for retail and service provision is centred on Guildford itself. Policy E7 (Guildford Town Centre) includes the delivery by 2033 of a new retail-led mixed use development of 45,000 sq m (gross) of additional comparison goods floorspace on the North Street regeneration site. Moreover, the policy supports the delivery of a mix of other town centre uses such as food and drink establishments, cinemas and gyms, active use of the riverside, and around 1,172 new homes.

The policy contained in the draft Plan is in keeping with the role of Guildford as the Borough’s main town centre, and the scale of development is commensurate with this role. Rushmoor Borough Council recognises that it is an appropriate scale of future growth for Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<th>Comment ID: PSLPP16/2112</th>
<th>Respondent: 8591041 / Surrey Wildlife Trust (Mike Waite)</th>
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<td>Policy E7: Guildford Town Centre.</td>
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<td>We welcome specific reference here to the importance of the River Wey corridor as a natural feature, and aspirations for the improvement of the natural environment within the town.</td>
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<th>Comment ID: PSLPP16/17184</th>
<th>Respondent: 8591329 / The House of Commons (Anne Milton MP)</th>
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<td>The redevelopment of the town centre is long overdue and there is an opportunity for GBC to be ambitious and visionary and inspire the people who live here, come here to work and those that visit. The town centre is currently designed around the traffic that goes through it and little is made of the river, the High Street or the views around. I would like to see GBC include some of these ideas and put more emphasis on enhancing the town for the future not simply doing more of the same.</td>
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<th>Respondent: 8593185 / Niels Laub</th>
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<tr>
<td>I OBJECT.</td>
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</table>
| There should be much more residential use of the town centre. Online shopping patterns would suggest that there is limited need for further retail space, which will use valuable land inefficiently and further increase traffic congestion in
the town centre. There is an urgent need for a brownfield register and to focus on brownfield redevelopment before considering development outside the existing urban area. CIL strategy must promote brownfield redevelopment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17375  Respondent: 8596673 / Peta Malthouse  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objection to Policy E7; North Street development.

GBC has failed to plan proactively for the 21st century when proposing 45,000 sq m of new retail space and has not recognised the role that residential development can play in ensuring the vitality of a town centre.

I object that 45,000 sq m is being set aside for increased retail space in Guildford Centre. This represents a 40% increase in retail space.

Internet shopping now accounts for 13% of all purchases nationally, up from 3% in 2007. Tesco, Sainsburys and Morrisons are all making losses. Austin Reed is closing its shops this month. The British Retail Consortium anticipates that thousands of stores and 1m jobs will be lost by 2025. The popularity of Amazon and clothes shopping online has come about mainly due to time being wasted in traffic jams and the huge cost in parking (£1.60 per hr in Guildford).

Guildford has been successful in maintaining retail capacity in the past. However, it will be shaped in future shaped by the forces that are changing high streets everywhere; the internet, an overall decline in clothes shopping and more money being spent on experiences and sport. It is not planning for the 21st century. Its assumption that it will continue to maintain and increase shops is flawed. Has there been much interest in this site from retailers?

This space could more profitably be used to fulfil the Government’s and GBC’s commitment to building sustainably on brownfield sites and using residential property to boost the vitality of town centres. GBC is only planning to build just 1,300 homes in the town centre. The town centre is where many people would like to live. (NPPF 20 and in particular 23 points 1 & 9 refer)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/2621  Respondent: 8601537 / Downsedge Residents’ Association (Rosemary Morgan)  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy E7: Guildford Town Centre Downsedge RA is disappointed that the paragraph describing the Vision for Guildford has been removed, and that the documents entitled “Allies and Morrison, draft Town Centre Vision 2015” and “Allies and Morrison, draft Guildford Town Centre Masterplan 2015” have both been removed as pieces of Key Evidence to the Local Plan. These documents, prepared at considerable expense to Guildford Borough Council, and after considerable lobbying by groups such as the Guildford Vision Group and the Guildford Society, provided an opportunity
to plan for our town centre in an imaginative and integrated way, and which could also address the many challenges arising from the developments envisaged in the Local Plan. Although Guildford Borough Council has replaced these two documents with their Draft Guildford Town Centre Regeneration Strategy 2017, this appears to remain a draft document and the conclusions and aspirations do not appear to be comprehensively brought forward into the Local Plan. Without a fully fledged integration, between major housing development on the urban fringe and a substantial redesign of the town centre transport network, as envisaged by Guildford Vision Group and others, Guildford clearly risks becoming permanently blighted by traffic problems.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11202  Respondent: 8602337 / Cross Group (Mr Colin Cross)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy E7 - Guildford Town Centre

I object that GBC do not accept the town centre as the ideal place for sustainable residential development. Internet shopping has changed the retail landscape and that will continue in the future so limited new shops are required. Guildford has ample opportunity to provide sustainable homes over the Local Plan period on brownfield sites in its centre.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1262  Respondent: 8608865 / WBDRA. (David Bird)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

WBDRA agrees that there should be a higher density & increased provision of sustainable residential development including a high proportion of Affordable Housing being no less than 40%.

In principle we 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: PSLPP16/1269  Respondent: 8608865 / WBDRA. (David Bird)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
WBDRA would like to see both a higher density and an increased provision of sustainable residential development with a proportion no less than 40% of Affordable Homes/Housing.

Subject to this, WBDRA could 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:** PSLPP16/2392  **Respondent:** 8609217 / West Clandon Parish Council (John Stone)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**POLICY E7 Guildford Town Centre**

We object to this policy.

1. The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.
2. There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.
3. There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure for example The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.
4. The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. We suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.
5. The policy also fails to provide guidance on design requirements, as required by the NPPF.
6. The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/9094  **Respondent:** 8609377 / Mr Andy White  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The policy is unsound as it does not take into account the change of shopping habits to online. Less land should be allocated to retail and more to housing.

The Town Centre Masterplan should be included within the Plan.
The Strategic Highway and Assessment Report (SHAR) has been produced late, has not been consulted upon and is unfinished. Information about traffic congestion – how much will occur and where – has not been given in time to inform Plan proposals or responses. It states the proposal to build 1000+ homes on Slyfield would not generate any additional traffic; omissions like this undermine the Plan and render it and the Plan unsound.

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: PSLPP16/9851</th>
<th>Respondent: 8627393 / Worpleson Parish Council (Gaynor White)</th>
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<td>E7 Guildford Town Centre</td>
<td>Support in principle – There should be a higher density and increased provision of sustainable residential development including a high proportion of affordable housing being no less than 40%. Plus there should be a reduced increase of retail provision.</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: 8627393 / Worpleson Parish Council (Gaynor White)</th>
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<th>Comment ID: PSLPP16/463</th>
<th>Respondent: 8640353 / Julian Cranwell</th>
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Response

Summary

I OBJECT to this policy

There should be much more residential use of the town centre. There is limited need for further retail, which will disadvantage existing retailers as well as using valuable land inefficiently. There is an urgent need for a brownfield register and to focus on brownfield redevelopment before considering development outside the existing urban area. CIL strategy must promote brownfield redevelopment.

Detailed response:

The government committed to legislating for a ‘brownfield register’ of ‘land suitable for housing in the Queen’s Speech 2015 and the 73 councils piloting the brownfield register were announced in March, 2016. Section 151 of the Act permits regulations requiring LPAs to keep a register of particular kinds of land, of which the brownfield register will be one. There is no reference to a brownfield policy within the policy for Guildford Town Centre, which is a major flaw.

Retail

Policy E7 is ill-informed. The evidence base fails to assess the capacity of the existing town centre to accommodate appropriate new development objectively. Paragraph 161 of the NPPF requires the LPA to assess the real quantitative and qualitative needs for economic activity including retail and leisure development, and I consider that this requirement has not been met.

Policy E7 is unlikely to benefit the health of the town centre in the future. There is no reliable evidence provided that the retail core of the Town Centre can support expansion of 45,000 sq m of additional retail space at North Street. There is a lack of demand for retail units in the Town Centre particularly large units.

There is falling demand for retail space in Guildford and town centres throughout the country (as evidenced by independent research and the reality of empty shops in many high streets (including Guildford) and the accelerating competition from internet shopping – see CEBR studies).

The North Street scheme has repeatedly failed in various redevelopment proposals over the last ten years. This is evidence of a lack of demand, such that the original planning permission for a large retail scheme became time expired. A number of major developers have studied the proposals in detail and then withdrawn from negotiations because the proposals are not economically viable.

The reality is that the town centre has enough retail floor space. If more is introduced it will result in the closure of existing shops particularly in locations which are less than 50% of peak Zone A or 100% positions.

What Guildford needs is a new focus on speciality high quality comparison shopping supported by a revival of Guildford’s attractive heritage core and the historic visitor attractions supported by restaurants.

The existing site in North Street should be replaced with a well-designed ground floor high quality speciality retail mall and frontage of no more than 40 shops extending to 7,000 sq m with the rear and upper floors providing an additional 500 to 600 homes. The proportion of the above proposed smaller scheme at North Street will be complementary to and not antagonistic to the Upper High Street, Tunsgate, the Debenhams site and the 100% Zone A positions of the Lower High Street. If the existing policy under E7 is adopted the North Street site will remain empty for another 10 years.
The findings of the Guildford Retail and Leisure Study 25 September 2015 are very pessimistic about retail trends. Carter Jonas’s recent study reports a bad time for retail. GBC’s own evidence base demonstrates that there is limited demand for additional retails space. The bullet points below are direct quotes from the report:

· Para 3.3 Retail Trends “Town centres, once the principle focus for retail and leisure are now increasingly under threat”

· Para 3.4 Retail Expenditure “disposable income and retailers’ margins are being squeezed further”

· Para 3.5 “there has been limited growth in retail (convenience and comparison goods) expenditure per head since 2008”

· Para 3.6 “the retail sector remains fragile and analysts forecast that some operators and centres will continue to struggle over the short to medium term”

· Para 3.8 “completed new shopping centre floor space in the UK is currently at its lowest level since the 1990s”

· Para 3.11 Internet Shopping “New forms of retailing have also emerged in recent years and are becoming established as significant alternatives to more traditional ‘bricks and mortar’ shopping facilities. Over the last 5 years, online sales have increased by 222%”

Appendix 6 of the Retail Study indicates inaccurate demand data

· Para 5.29 “The latest CoStar Report recorded 64 requirements for Guildford from January 2013 to August 2014; representing a total maximum floor space requirement of 62,208m2 gross (see Appendix 6).”

· This looks in the main unpersuasive with brands such as Joules Clothing; Fossil; Comptoir des Cotonniers; Moshulu; Rituals; Princesse tam.tam; Cycle Surgery; Majestic Wine; Game Stores Group Ltd; Iceland. But if we look closely at Appendix 6 it is an amalgam of old unchecked national high street requirements some of which do not even include Guildford as a destination and most is hardly high quality comparison retail. There are also no “big” requirements in terms of space. Where are the big stores?

· GH Pressley & Sons – Watches and Silver - Requirement “They are seeking a flagship diamond store in central London. Target locations include Mayfair, St James, Kensington and Knightsbridge. Brands will include Hans D Krieger and Marco Bicego.” This does not sound like Guildford

· Oxygen Red Ltd – Ladieswear- Requirement “Oxygen Red is looking to acquire temporary stores in Shopping Centre locations within the M25” Guildford is well outside the M25

· Game Stores Group Ltd have apparently a requirement for a store in Guildford dated 2012 but the company entered administration on 26 March 2012, and 277 of Game's 609 UK stores were closed immediately, resulting in 2,104 job losses. Are they really looking?

· The data relating to retail demand does not appear reliable. The 62,800 sq m does not translate to real demand for an expansion of 500,000 sq ft. If proper due diligence was applied perhaps 10% of this Carter Jonas requirement would survive

Brownfield redevelopment

We must make full use of our urban brownfield before we consider building in the Green Belt or countryside. Paragraph 17 of the NPPF states that to “encourage the effective use of land by reusing land that has been previously developed (brownfield land)” is a core planning principle. Paragraph 80 of the NPPF clearly states that Green Belt serves a key purpose, “to assist in urban regeneration, by encouraging the recycling of derelict land and other urban land”. In order to comply with central planning policy we need a brownfield strategy.
In response to the detailed objections received in the Regulation 18 process of the 2014 Local Plan and also in accordance with government policy a Guildford brownfield land register should be urgently compiled showing address, ownership, occupier, current use and detailed planning brief.

- GBC needs to accelerate residential redevelopment at Woodbridge Meadows, Walnut Tree Close and the Station within the next 1 to 5 years
- GBC needs to examine the residential development opportunity of the 25.7 acres of car parks in GBC ownership
- A brownfield-first policy should underline all planning decisions and the default for non-brownfield land should be rejection
- Failure to promote brownfield-first is unsustainable and is contrary both to the policies of the Metropolitan Green Belt (still in force) and NPPF paragraph 80 and 84.

Our recommendation is for a new Brownfield Policy for the town centre:

“We are committed to a brownfield-first initiative. All applications on previously developed land within the urban settlement area will be given fast-track priority. Development of urban brownfield land will be prioritised for residential and employment purposes to satisfy the needs of local people.

In parallel a zero-CIL incentive should be given for all residential development on urban brownfield land in order to meet the NPPF requirement for urban regeneration. Brownfield sites in the urban area should be identified as soon as possible. The register should be public, with full details of ownership. All brownfield sites owned by Guildford Borough Council, Surrey County Council or other government entities should be considered as available development land within the first 5 years of the plan.”

**Residential**

I do not believe that the target of 1,172 homes in the town centre takes account of the need and demand for urban housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town. This will help to sustain the retail core. The Town Centre policy needs to maximise the potential for residential development on brownfield. It must include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015 which has recently been adopted by GBC. I consider that the Town Centre has the capacity for the higher of at least 50% of the total or at least 5,000 homes. At present, the plan is to impose 70% of new residential development on greenfield and Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

We object to this policy. There should be much more residential use of the town centre. There is limited need for further retail, which will disadvantage existing retailers as well as using valuable land inefficiently. There is an urgent need for a brownfield register and to focus on brownfield redevelopment before considering development outside the existing urban area. CIL strategy must promote brownfield redevelopment.
The government committed to legislating for a ‘brownfield register’ of ‘land suitable for housing in the Queen’s Speech 2015 and the 73 councils piloting the brownfield register were announced in March, 2016. Section 151 of the Act permits regulations requiring LPAs to keep a register of particular kinds of land, of which the brownfield register will be one. There is no reference to a brownfield policy within the policy for Guildford Town Centre, which is a major flaw.

Retail

Policy E7 is ill-informed. The evidence base fails to assess the capacity of the existing town centre to accommodate appropriate new development objectively. Paragraph 161 of the NPPF requires the LPA to assess the real quantitative and qualitative needs for economic activity including retail and leisure development, and we consider that this requirement has not been met.

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There is falling demand for retail space in Guildford and town centres throughout the country (as evidenced by independent research and the reality of empty shops in many high streets (including Guildford) and the accelerating competition from internet shopping – see CEBR studies).

The North Street scheme has repeatedly failed in various redevelopment proposals over the last ten years. This is evidence of a lack of demand, such that the original planning permission for a large retail scheme became time expired. A number of major developers have studied the proposals in detail and then withdrawn from negotiations because the proposals are not economically viable.

The reality is that the town centre has enough retail floor space. If more is introduced it will result in the closure of existing shops particularly in locations which are less than 50% of peak Zone A or 100% positions.

What Guildford needs is a new focus on speciality high quality comparison shopping supported by a revival of Guildford’s attractive heritage core and the historic visitor attractions supported by restaurants.

The existing site in North Street should be replaced with a well-designed ground floor high quality speciality retail mall and frontage of no more than 40 shops extending to 7,000 sq m with the rear and upper floors providing an additional 500 to 600 homes. The proportion of the above proposed smaller scheme at North Street will be complementary to and not antagonistic to the Upper High Street, Tunsgate, the Debenhams site and the 100% Zone A positions of the Lower High Street. If the existing policy under E7 is adopted the North Street site will remain empty for another 10 years.

The findings of the Guildford Retail and Leisure Study 25 September 2015 are very pessimistic about retail trends. Carter Jonas’s recent study reports a bad time for retail. GBC’s own evidence base demonstrates that there is limited demand for additional retail space. The bullet points below are direct quotes from the report:

- Para 3.3 Retail Trends “Town centres, once the principle focus for retail and leisure are now increasingly under threat”
- Para 3.4 Retail Expenditure “disposable income and retailers’ margins are being squeezed further”
- Para 3.5 “there has been limited growth in retail (convenience and comparison goods) expenditure per head since 2008”
- Para 3.6 “the retail sector remains fragile and analysts forecast that some operators and centres will continue to struggle over the short to medium term”
- Para 3.8 “completed new shopping centre floor space in the UK is currently at its lowest level since the 1990s”
- Para 3.11 Internet Shopping “New forms of retailing have also emerged in recent years and are becoming established as significant alternatives to more traditional ‘bricks and mortar’ shopping facilities. Over the last 5 years, online sales have increased by 222%”
Appendix 6 of the Retail Study indicates inaccurate demand data

- Para 5.29 “The latest CoStar Report recorded 64 requirements for Guildford from January 2013 to August 2014; representing a total maximum floor space requirement of 62,208m² gross (see Appendix 6).”
- This looks in the main unpersuasive with brands such as Joules Clothing; Fossil; Comptoir des Cotonniers; Moshulu; Rituals; Princesse tam.tam; Cycle Surgery; Majestic Wine; Game Stores Group Ltd; Iceland. But if we look closely at Appendix 6 it is an amalgam of old unchecked national high street requirements some of which do not even include Guildford as a destination and most is hardly high quality comparison retail. There are also no “big” requirements in terms of space. Where are the big stores?
- GH Pressley & Sons – Watches and Silver - Requirement “They are seeking a flagship diamond store in central London. Target locations include Mayfair, St James, Kensington and Knightsbridge. Brands will include Hans D Krieger and Marco Bicego.” This does not sound like Guildford
- Oxygen Red Ltd – Ladieswear - Requirement “Oxygen Red is looking to acquire temporary stores in Shopping Centre locations within the M25” Guildford is well outside the M25
- Game Stores Group Ltd have apparently a requirement for a store in Guildford dated 2012 but the company entered administration on 26 March 2012, and 277 of Game's 609 UK stores were closed immediately, resulting in 2,104 job losses. Are they really looking?
- The data relating to retail demand does not appear reliable. The 62,800 sq m does not translate to real demand for an expansion of 500,000 sq ft. If proper due diligence was applied perhaps 10% of this Carter Jonas requirement would survive

Brownfield redevelopment

We must make full use of our urban brownfield before we consider building in the Green Belt or countryside. Paragraph 17 of the NPPF states that to “encourage the effective use of land by reusing land that has been previously developed (brownfield land)” is a core planning principle. Paragraph 80 of the NPPF clearly states that Green Belt serves a key purpose, “to assist in urban regeneration, by encouraging the recycling of derelict land and other urban land”. In order to comply with central planning policy we need a brownfield strategy.

In response to the detailed objections received in the Regulation 18 process of the 2014 Local Plan and also in accordance with government policy a Guildford brownfield land register should be urgently compiled showing address, ownership, occupier, current use and detailed planning brief.

- GBC needs to accelerate residential redevelopment at Woodbridge Meadows, Walnut Tree Close and the Station within the next 1 to 5 years
- GBC needs to examine the residential development opportunity of the 25.7 acres of car parks in GBC ownership
- A brownfield-first policy should underlie all planning decisions and the default for non-brownfield land should be rejection
- Failure to promote brownfield-first is unsustainable and is contrary both to the policies of the Metropolitan Green Belt (still in force) and NPPF paragraph 80 and 84.

Our recommendation is for a new Brownfield Policy for the town centre:

“We are committed to a brownfield-first initiative. All applications on previously developed land within the urban settlement area will be given fast-track priority. Development of urban brownfield land will be prioritised for residential and employment purposes to satisfy the needs of local people.

In parallel a zero-CIL incentive should be given for all residential development on urban brownfield land in order to meet the NPPF requirement for urban regeneration. Brownfield sites in the urban area should be identified as soon as possible. The register should be public, with full details of ownership. All brownfield sites owned by Guildford Borough Council, Surrey County Council or other government entities should be considered as available development land within the first 5 years of the plan.”
Residential

We do not believe that the target of 1,172 homes in the town centre takes account of the need and demand for urban housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town. This will help to sustain the retail core. The Town Centre policy needs to maximise the potential for residential development on brownfield. It must include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015 which has recently been adopted by GBC. We consider that the Town Centre has the capacity for the higher of at least 50% of the total or at least 5,000 homes. At present, the plan is to impose 70% of new residential development on greenfield and Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5246  Respondent: 8655233 / Kay Mackay  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY E7

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5051  Respondent: 8667713 / Victoria Sinnett  Agent:
1. POLICY E7

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The policy also fails to provide guidance on design requirements, as required by the NPPF.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
development. The Riverside could be connected through Guildford as a pedestrian channel with attractive gardens, benches and cafes at strategic points.

According to the NPPF, there should be design requirements, but these have not been considered. The designs should consider references to existing historic buildings and local materials. This is an opportunity, which seems to be neglected by GBC, to improve the look of Guildford, ruined in part by 60s/70s/80s/ brutalist architecture.

There is too much emphasis on shopping. Rates should be reduced for food shops, who cannot afford (and are therefore not available) the rates paid by chain stores, of which there are far too many already.

GBC made a big mistake developing the new Waitrose site with on-ground, rather than below-ground parking, or even multi-story parking.

The open air car parks should all be re-developed including the large one near the River (Yvonne Arnaud) where shops, a large development of flats and parking could be built.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Although the number of houses planned for Guildford town centre has increased slightly compared to the 2016 version of the Plan I still object to the priority accorded to retail and other commercial developments over housing - especially affordable housing. Guildford town is where people - especially young people - want to live, rather than in locations that require them to travel. A positive and comprehensive vision for housing in the town centre is lacking from this Plan. 

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1080  Respondent: 8687265 / Dagero Ltd (David Roberts)  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY E7 Guildford Town Centre

I OBJECT. The policy “vision” refers to protecting the Guildford’s “unique setting” (including, surely, its surrounding Green Belt and countryside views) but this is not carried over into the formal policy wording in the blue box. It is therefore a worthless commitment.

There should be much more residential use of the town centre where most people, especially the young and less well-off, want to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose a visionary regeneration plan for the River Wey/Walnut Tree Close area, where there is arguably enough brownfield land for 4,000 new homes, meeting near all the borough’s housing need over the plan period without harming the countryside. There is an urgent need for a brownfield register and to focus on brownfield redevelopment before considering development outside the existing urban area. CIL strategy must promote brownfield redevelopment.

Strangely, the policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public debate.

This policy also fails to provide guidance on design requirements, as required by the NPPF.11

Instead, it is far too concerned with shopping. Town-centre shopping is in decline internationally as consumers move irreversibly online. There is no need to expand physical retail capacity or warehousing floorspace, which will only kill off existing shops while using up valuable housing land. The delays to the redevelopment of North Street is a flashing red light warning that consumer patterns are shifting. Guildford is a large town without a single butcher or fishmonger, showing that the Council need to use the fiscal and other mechanisms at its disposal to support niche retailers. To opt for large, impersonal department stores and dull high-street chain stores at the expense of Guildford’s unique character would be an historic blunder. For this type of shopping, most residents can go to Woking or Kingston, whose ugly town centres should serve as a dire warning to Guildford planners.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2631  Respondent: 8693153 / Vicki Willetts  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT TO POLICY E7 (TOWN CENTRE): • No statement in policy wording of value of Guildford’s rural setting and views. • No consideration of Town Centre Master Plan, GVG proposals or station redevelopment plans. • Proportion of new housing in town far too small. Development pushed into countryside, ruining the latter and harming urban regeneration.

4

• No brownfield register. • Too much big retail, despite online shopping revolution and decline of traditional high streets internationally. Futile to try to turn Guildford into Woking or Kingston. • No measures to support small, niche retailers in town, e.g. through business rates.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15032  Respondent: 8708545 / Nigel Wicks  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Policy E7 Guildford Town Centre

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4507  Respondent: 8709249 / Geoff Spink  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY E7

I OBJECT to Policy E7 Guildford Town Centre

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There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of
new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher 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: PSLPP16/4731  Respondent: 8711841 / Rosmarie Roberts-Kunz  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY E7 (TOWN CENTRE):

- No statement in policy wording of value of Guildford’s rural setting and views.
- No consideration of Town Centre Master Plan, GVG proposals or plans to redevelop the station.
- Far too little new housing in town. Development pushed into countryside, ruining the latter and harming urban regeneration.
- No brownfield register.
- Too much big retail, despite online shopping revolution and decline of traditional high streets internationally. Futile to try to turn Guildford into Woking or Kingston.
- No measures to support small, niche retailers in town, e.g. through business rates.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11637  Respondent: 8721857 / Andrea Lightfoot  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The policy “vision” refers to protecting the Guildford’s “unique setting” (including, surely, its surrounding Green Belt and countryside views) but this is not carried over into the formal policy wording in the blue box.

There should be much more residential use of the town centre where most people, especially the young and less well-off,
want to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose a visionary regeneration plan for the River Wey/Walnut Tree Close area, where there is arguably enough brownfield land for 4,000 new homes, meeting near all the borough’s housing need over the plan period without harming the countryside. There is an urgent need for a brownfield register and to focus on brownfield redevelopment before considering development outside the existing urban area. CIL strategy must promote brownfield redevelopment

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9065  Respondent: 8723809 / Sally Blake  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to POLICY E7 Guildford Town Centre

- No statement in policy wording of value of Guildford’s rural setting and views.
- No consideration of Town Centre Master Plan, GVG proposals or station redevelopment plans.
- Proportion of new housing in town far too small. Development pushed into countryside, ruining the latter and harming urban regeneration.
- No brownfield register.
- Too much big retail, despite online shopping revolution and decline of traditional high streets internationally. Futile to try to turn Guildford into Woking or Kingston.
- No measures to support small, niche retailers in town, e.g. through business rates.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3235  Respondent: 8726529 / Eric Palmer  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY E7

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The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.
There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Object

One of the biggest issues with the local plan is the failure of a strong and far sighted plan for the town. Where is the urban housing development?

Only 2000 houses on brownfield in the town of Guildford are not sufficient, especially when other policies promote retail and industry within the town.

Where are the people going to live to support retail? There are sites available, for example, various sites in Woodbridge Meadows (relocating post office would be a major boost for example), Walnut Tree Close (including the area around the station) and North Street.

I really do not understand the focus on retail and the 40% growth in what is widely now regarded as a contracting business sector, while denying land for housing we also observe:-

1. Retail is contracting. The British Retail Consortium forecast that by 2020 up to one third of those now employed in traditional retail could lose their job.
2. Online sales are still growing. Recently it was announced that 13% of total retail sales now made over the internet.
3. This does not meet the stated objective of attracting highly paid jobs to the area – the majority of jobs in retail are low paid, with zero hours contracts and usually a pay rate based on the minimum wage.

We need the plans for retail to be converted into plans for building sustainable houses.

Especially social houses (i.e. council led).

I expect this plan to change to deliver a much higher density of house building and much more brownfield land allocated away from retail. Good design is essential.

I do like the idea of developing and promoting the river area as a key attraction.
CIL strategy must promote brownfield redevelopment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/16899  **Respondent:** 8728865 / Neville Bryan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Object

Wrong and misguided policy which flies in the face of national and global trends.

Where is the urban housing development? Only 2000 odd houses in the town of Guildford is not sufficient, especially when other policies promote retail and industry within the town. Where are the people going to live? There are sites available, for example, various sites in Woodbridge Meadows (relocating post office would be a major boost for example), Walnut Tree Close (including the area around the station) and North Street.

We do not understand the focus on retail and the 40% growth in a dying sector. While denying land for housing we also observe:-

1. Retail is contracting. The British Retail Consortium forecast that by 2020 up to one third of those now employed in traditional retail could lose their job.
2. Online sales are still growing. Recently it was announced that 13% of total retail sales now made over the internet.
3. This does not meet the stated objective of attracting highly paid jobs to the area – the majority of jobs in retail are low paid, with zero hours contracts and usually a pay rate based on the minimum wage.

We need the plans for retail to be converted into plans for building sustainable houses.

Especially social houses (i.e. council led).

CIL strategy must promote brownfield redevelopment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp171/2065  **Respondent:** 8729217 / Karen Stevens  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Retail space

I object to the changes in policy E7, which now propose 41,000 sqm expansion of retail space at North Street. This allocation is excessive and does not take into account growth in the online retail sector. Furthermore, it is not supported by adequate assessment of demand. This space should alternatively provide housing or office space.
Town centre residential development

I also object to the continued failure of this policy to provide adequate residential development in the town centre. The town centre is the most sustainable location for housing, and yet this version of the Plan allocates just 1,300 homes – around 10 per cent of the total planned for the borough. This allocation could be at least doubled. A master plan created by Allies and Morrison, and originally adopted by GBC, identified land in the town centre for 2,551 units.

In addition to the land identified by Allies and Morrison, Guildford has more than 25 acres of surface car parking in its ownership that could be built over, including the under-utilised Onslow Park and Ride, which until March 2017 was used as a free car park for the University and Hospital staff.

Guildford’s failure to fully exploit brownfield sites in the town centre is contrary to the NPPF and to the latest Government White Paper on housing, which states:

“the Government proposes to amend the National Planning Policy Framework to make it clear that plans and individual development proposals should ... address the particular scope for higher-density housing in urban locations” (A68)

I object to the deletion in paragraph 4.4.72 of the statement “we will continue and extend an active dialogue with our residents and other stakeholders”. This is contrary to the spirit of localism. This statement should also extend to “listening and considering views of stakeholders”, not just dialogue.

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)
wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12962  Respondent: 8735873 / David and Gillian Allan  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy E7 Guildford Town Centre

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1333  Respondent: 8740321 / J McClellan  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E7
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

GUILDFORD TOWN CENTRE? Policy E7

I OBJECT to this policy, more residential use of land should be provided within the town centre, which is where the young and less well off would much rather live - ease of access and no travel costs and existing infrastructure and facilities. The greenbelt should not be built on just because it's easier for developers to do that, regenerate and reuse in these times of being eco friendly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7668  Respondent: 8743073 / Darrell Howard  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E7
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

• Insufficient/inappropriate focus on developing Brown Field sites. The expansion of urban areas to accommodate more commercial real estate indicates the Council is not interested in maximising Brown Field sites for housing purposes. For example, under Policy E7: Guildford Town Centre, it is suggested that 45,000 sq m of land at North Street should be assigned for retail uses not housing.

Online retail is set to account for 21.5% of total retail sales by 2018 from 12.7% in 2013, the highest online retail share in the world according to the Centre for Retail Research. In March 2016, online sales rose 12.3%, and it was the third consecutive month in which more than 20% of all non-food shopping took place online according to the British Retail Consortium and accounting firm KPMG. With such a high swing to online purchasing, retailers will need 70 high street stores to create a national presence compared to 250 in the mid 2000’s. An expansion on such a scale is negligent when the Council claims to be in such desperate need for housing. Retail is a declining industry and should not be invested in by the Borough at the expense of housing in the most sustainable urban locations, near employment and transport hubs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13876  Respondent: 8743137 / Ben Woodford  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E7
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### Comment ID: PSLPP16/9334  Respondent: 8744417 / Mark & Gillie Hammersley  Agent:  
### Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E7  
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Comment ID: PSLPP16/12318  Respondent: 8749473 / Charlotte Beckett  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

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Attached documents:

Comment ID: PSLPP16/12545  Respondent: 8769793 / Laura Richards  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

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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:** PSLPP16/4897  **Respondent:** 8771233 / Ranald Mackinnon  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

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Attached documents:

Comment ID: PSLPP16/16504  Respondent: 8794753 / Andrew Beckett  Agent:

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Attached documents:

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Comment ID: PSLPP16/16565  Respondent: 8795329 / Nicholas Williams  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E7
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the expansion of commercial land in the urban area. This is complete insanity. Online retail is growing and high street stores declining. This 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: PSLPP16/7586  Respondent: 8798849 / David Williams  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E7
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Attached documents:

Comment ID: PSLPP16/12754   Respondent: 8800545 / Bill Taylor   Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

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Attached documents:

Comment ID: PSLPP16/5281   Respondent: 8810113 / Louise Stewart   Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

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**Comment ID:** PSLPP16/9333  **Respondent:** 8812097 / Clare Benzikie  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

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Attached documents:

Comment ID: PSLPP16/3110  Respondent: 8813345 / Alison Craze  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I do not agree that Guildford Town Centre should have an increase in retail space. In my view Guildford should encourage development of more town centre housing, so that there is a pleasant environment in the evenings when the shops are closed.

Why are so many of the upper floors above shops apparently empty?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16448  Respondent: 8818625 / Beth and Frank Fuller  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

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**Comment ID:** PSLPP16/13254  **Respondent:** 8820353 / Gillian Beaton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

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**Comment ID:** PSLPP16/182  **Respondent:** 8823553 / Rick Day  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

**Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( Yes ), is Legally Compliant? ( Yes )**
Policy E7 should be amended in some way to encourage or promote independent "non-chain" retailers as a way of competing with other retail centres. These independent retailers differentiate the High St from those in other centres and give a reason for shoppers to come here rather than there.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3125  Respondent: 8826177 / Charles Spence  Agent:

Policy E7 proposes increasing the retail space in Guildford. As noted above, policy E2 proposes focusing employment on Guildford. I object to the focus on improving Guildford whilst houses are added to the surrounding villages. This leads to an even more unbalanced community. I also object to the presumption that more retail space is required. As shopping trends change to move online, retail will decline. The space should be used for housing and the money should be used to improve transport and other infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: pslp171/1101  Respondent: 8826177 / Charles Spence  Agent:

Guildford town centre needs more apartment homes not more shopping space. Online retailing is driving major change in ways of shopping. It is also inconsistent to focus employment growth on Guildford town centre, whilst also acknowledging all the existing transport problems in the town centre.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPP16/13395  Respondent: 8826369 / Tim Madge  Agent:

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<th>Respondent: 8828417 / Valerie Wild</th>
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<td>OBJECT. Guildford is in danger of throttling itself. It is not suited to be a 'growth hub'. It does not need more retail. The emphasis should be more residential use and preserving its historic appeal and character.</td>
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POLICY E7

I OBJECT to Policy E7 Guildford Town Centre

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There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17405  Respondent: 8834689 / of NLP Ltd c/o Solum Regeneration (Dennis Pope)  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We consider the policy itself provides the appropriate strategy for the town centre, but requires some amendment to be internally consistent with other parts of the LP and increase consistency with the NPPF.
We therefore suggest introducing an additional bullet, consistent with the site allocation for one of the centre's key strategic sites, to read:

- "an improved railway station and interchange, facilitated by a comprehensive residential-led mixed use redevelopment of the Station site"

We would also suggest that bullet point 3 should be amended as follows to reflect our comments above:

- A minimum of 1,172 new homes, particularly on upper floors as part of mixed use developments;

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICY E7

I OBJECT to Policy E7 Guildford Town Centre

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18188  Respondent: 8843361 / Adrian Atkinson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Policy E7 Guildford Town Centre  I have been involved with retail for all of my 25 year career and policy E7 is so ill-informed it makes me wonder how bad the rest of the plan is and, in my opinion therefore, fails the requirements of Section 161 of the NPPF to assess the real quantitative and qualitative floor space needs. There is no reliable evidence provided that the retail core of the Town Centre needs or can be expanded by 45,000 sq m of retail space at North Street because of lack of demand for retail units in the Town Centre particularly large units. This is shown in what is happening in Kingston. Only in April the Kingston Council leader Kevin Davis said:“One of the things Kingston faces is the change in the nature of retail.

"We rely so much on the promotions aspect of the town centre retail but, something we are going to have to face up to is that the nature of retail is changing.

"It’s very interesting that one of the stores closing down is BHS, which is very much how retail was. It is a big department store selling lots of goods."
"We know after discussions going on over planning applications in the town centre that the trend is for smaller or independent stores, so we are going to see more of that happening." We are planning to over develop Guildford to make another Woking, Kingston. This article sums up perfectly what Guildford is sleeping walking towards – it’s not what Guildford deserves, it can be different and better.

Pressure on the green belt is partly driven by the number and density of housing in the town being too low and too much land has been devoted to massively EXPANDING the retail footprint of the town. The draft local plan proposes a pitiful 1172 homes in the town centre. This is too few and is not balanced with the number proposed for less sustainable rural, green belt sites. Expanding bricks and mortar retail footprint at the expense of much needed housing is a stupid policy, a failed policy of the past let alone a future-proof policy we deserve for Guildford town. It is a declining sector now, it has been for a number of years, its contraction is accelerating and will continue to do so. Develop a compelling proposition with what we have now, take ownership, creating a true shopper experience (not lots) is what is needed rather than just hand our town over to another lot of developers to bring Woking, Croydon and Lakeside Thurrock to our historic market town. A brief look at the proposals for EXTRA retail space will effectively give over prime areas of our town to the equivalent of an extra 30 Aldi supermarkets. This area of ADDITIONAL shops Guildford does not need. If one looks closely at the "demand" evidence in the Retail Study of the DLP, some of the "demand" is not for a location such as Guildford and some examples of companies looking for sites have ceased trading. I guess the demise of BHS is going to free up some sites elsewhere in the south east. BHS will not be the last retailer to go under this year. As I type I’m hearing rumours of East clothing retailer following the same path into administration as BHS and Austin Reed. Majestic is listed as looking for sites in Guildford, they have one and their new CEO in 2015 stated to shareholders


"The new chief executive of Majestic Wine is scrapping bonus limits for store managers and has drastically cut guildford deserves, it can be different and better. http://www.independent.co.uk/voices/comment/we-don-t-need-shops-we-do-need-homes-let-s-swap-one-for-the-other-9785749.html

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"The new chief executive of Majestic Wine is scrapping bonus limits for store managers and has drastically cut
Milmead?! Seems silly, but if one steps back that is exactly what they are planning (well the equivalent of) elsewhere in the town. This is due to falling demand for retail space in Guildford and town centres throughout the country evidenced by independent research and the reality of empty shops in many high streets (including Guildford) and the accelerating competition from internet shopping. The failure of the North Street scheme to be redeveloped over the last ten years is a testament to lack of demand which has been so poor that the original planning permission for a large retail scheme became time expired. What Guildford needs is a new focus on speciality high quality comparison shopping supported by a revival of Guildford’s attractive heritage core and a new major visitor attraction supported by restaurants. Guildford needs to become the quality shopping destination for Surrey. The Appendix 6 list of retailer demand looks impressive with brands such as Joules Clothing; Fossil; Comptoir des Cotonniers; Moshulu; Rituals; Princesse tam.tam; Cycle Surgery; Majestic Wine; Game Stores Group Ltd; Iceland. However, if we look closely at Appendix 6 it is an amalgam of old unchecked national high street requirements some of which do not even include Guildford as a destination and the majority are hardly high quality comparison retail. There are also no “big” requirements in terms of space. Where are the big stores? GH Pressley & Sons – Watches and Silver- Requirement “They are seeking a flagship diamond store in central London. Target locations include Mayfair, St James, Kensington and Knightsbridge. Brands will include Hans D Krieger and Marco Bicego.” This does not sound like Guildford. Oxygen Red Ltd – Ladieswear- Requirement “Oxygen Red is looking to acquire temporary stores in Shopping Centre locations within the M25” Guildford is well outside the M25. The data relating to retail demand does not appear reliable. The 62,800 sq m does not translate to real demand for an expansion of 500,000 sq ft. If proper due diligence was applied perhaps 30% of this alleged Carter Jonas requirement would survive proper scrutiny.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 

**Comment ID:** PSLPP16/1292  **Respondent:** 8845825 / John Gould  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Shopping is changing with many people buying on line, and we think that the number of retail outlets in the town will reduce and could be made suitable for more housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/1963  **Respondent:** 8848033 / Paul Gerrard  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( Yes ), is Legally Compliant? ( )

I strongly approve. The riverside area is currently underused but could be a very attractive venue. The Friary and surrounding area could be much improved, and to be honest the Council has made a bit of a mess in recent years by allowing demolition/dereliction before a watertight plan for replacement. Also the mix of shopping units overall has been lacking, leading to a loss in more distinctive small/specialist shops that make Guildford stand out from other generic shopping centres.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
4.4.70 I disagree with the comparisons to Kingston and Woking as examples of "improvement" with their unfocused overdevelopment and characterless, identikit shopping centres. They are some of the worst examples of how town planners can ruin a town. Has anybody considered that people like to visit Guildford precisely because it isn't overdeveloped like those other places (yet), and has a smaller, friendlier, more diverse market town feel to it? Quality is better than quantity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to this policy. There should be much more residential use of the town centre. There is limited need for further retail, which will disadvantage existing retailers as well as using valuable land inefficiently. There is an urgent need for a brownfield register and to focus on brownfield redevelopment before considering development outside the existing urban area. CIL strategy must promote brownfield redevelopment.

The government committed to legislating for a ‘brownfield register’ of ‘land suitable for housing in the Queen’s Speech 2015 and the 73 councils piloting the brownfield register were announced in March, 2016. Section 151 of the Act permits regulations requiring LPAs to keep a register of particular kinds of land, of which the brownfield register will be one. There is no reference to a brownfield policy within the policy for Guildford Town Centre, which is a major flaw.

Retail

Policy E7 is ill-informed. The evidence base fails to assess the capacity of the existing town centre to accommodate appropriate new development objectively. Paragraph 161 of the NPPF requires the LPA to assess the real quantitative and qualitative needs for economic activity including retail and leisure development, and we consider that this requirement has not been met.

Policy E7 is unlikely to benefit the health of the town centre in the future. There is no reliable evidence provided that the retail core of the Town Centre can support expansion of 45,000 sq m of additional retail space at North Street. There is a lack of demand for retail units in the Town Centre particularly large units. More sympathetic high class such as a town square with arched portico walkways allowing street cafes, restaurants and covered window shopping such as in Bologna.

There is falling demand for retail space in Guildford and town centres throughout the country (as evidenced by independent research and the reality of empty shops in many high streets (including Guildford) and the accelerating competition from internet shopping – see CEBR studies).

The North Street scheme has repeatedly failed in various redevelopment proposals over the last ten years. This is evidence of a lack of demand, such that the original planning permission for a large retail scheme became time expired. A number of major developers have studied the proposals in detail and then withdrawn from negotiations because the proposals are not economically viable.

The reality is that the town centre has enough retail floor space. If more is introduced it will result in the closure of existing shops particularly in locations which are less than 50% of peak Zone A or 100% positions.

What Guildford needs is a new focus on speciality high quality comparison shopping supported by a revival of Guildford’s attractive heritage core and the historic visitor attractions supported by restaurants.

The existing site in North Street should be replaced with a well-designed ground floor high quality speciality retail mall and frontage of no more than 40 shops extending to 7,000 sq m with the rear and upper floors providing an additional 500 to 600 homes. The proportion of the above proposed smaller scheme at North Street will be complementary to and not antagonistic to the Upper High Street, Tunsgate, the Debenhams site and the 100% Zone A positions of the Lower High Street. If the existing policy under E7 is adopted the North Street site will remain empty for another 10 years.

The findings of the Guildford Retail and Leisure Study 25 September 2015 are very pessimistic about retail trends. Carter Jonas’s recent study reports a bad time for retail. GBC’s own evidence base demonstrates that there is limited demand for additional retails space. The bullet points below are direct quotes from the report:

- Para 3.3 Retail Trends “Town centres, once the principle focus for retail and leisure are now increasingly under threat”
- Para 3.4 Retail Expenditure “disposable income and retailers’ margins are being squeezed further”
- Para 3.5 “there has been limited growth in retail (convenience and comparison goods) expenditure per head since 2008”
- Para 3.6 “the retail sector remains fragile and analysts forecast that some operators and centres will continue to struggle over the short to medium term”
Para 3.8 “completed new shopping centre floor space in the UK is currently at its lowest level since the 1990s”

Para 3.11 Internet Shopping “New forms of retailing have also emerged in recent years and are becoming established as significant alternatives to more traditional ‘bricks and mortar’ shopping facilities. Over the last 5 years, online sales have increased by 222%”

Appendix 6 of the Retail Study indicates inaccurate demand data

- Para 5.29 “The latest CoStar Report recorded 64 requirements for Guildford from January 2013 to August 2014; representing a total maximum floor space requirement of 62,208m2 gross (see Appendix 6).”
- This looks in the main unpersuasive with brands such as Joules Clothing; Fossil; Comptoir des Cotonniers; Moshulu; Rituals; Princesse tam.tam; Cycle Surgery; Majestic Wine; Game Stores Group Ltd; Iceland. But if we look closely at Appendix 6 it is an amalgam of old unchecked national high street requirements some of which do not even include Guildford as a destination and most is hardly high quality comparison retail. There are also no “big” requirements in terms of space. Where are the big stores?
- GH Pressley & Sons – Watches and Silver- Requirement “They are seeking a flagship diamond store in central London. Target locations include Mayfair, St James, Kensington and Knightsbridge. Brands will include Hans D Krieger and Marco Bicego.” This does not sound like Guildford
- Oxygen Red Ltd – Ladieswear- Requirement “Oxygen Red is looking to acquire temporary stores in Shopping Centre locations within the M25” Guildford is well outside the M25
- Game Stores Group Ltd have apparently a requirement for a store in Guildford dated 2012 but the company entered administration on 26 March 2012, and 277 of Game's 609 UK stores were closed immediately, resulting in 2,104 job losses. Are they really looking?
- The data relating to retail demand does not appear reliable. The 62,800 sq m does not translate to real demand for an expansion of 500,000 sq ft. If proper due diligence was applied perhaps 10% of this Carter Jonas requirement would survive

Brownfield redevelopment

We must make full use of our urban brownfield before we consider building in the Green Belt or countryside. Paragraph 17 of the NPPF states that to “encourage the effective use of land by reusing land that has been previously developed (brownfield land)” is a core planning principle. Paragraph 80 of the NPPF clearly states that Green Belt serves a key purpose, “to assist in urban regeneration, by encouraging the recycling of derelict land and other urban land”. In order to comply with central planning policy we need a brownfield strategy.

In response to the detailed objections received in the Regulation 18 process of the 2014 Local Plan and also in accordance with government policy a Guildford brownfield land register should be urgently compiled showing address, ownership, occupier, current use and detailed planning brief.

- GBC needs to accelerate residential redevelopment at Woodbridge Meadows, Walnut Tree Close and the Station within the next 1 to 5 years
- GBC needs to examine the residential development opportunity of the 25.7 acres of car parks in GBC ownership
- A brownfield-first policy should underlie all planning decisions and the default for non-brownfield land should be rejection
- Failure to promote brownfield-first is unsustainable and is contrary both to the policies of the Metropolitan Green Belt (still in force) and NPPF paragraph 80 and 84.

Our recommendation is for a new Brownfield Policy for the town centre:

“We are committed to a brownfield-first initiative. All applications on previously developed land within the urban settlement area will be given fast-track priority. Development of urban brownfield land will be prioritised for residential and employment purposes to satisfy the needs of local people.
In parallel a zero-CIL incentive should be given for all residential development on urban brownfield land in order to meet the NPPF requirement for urban regeneration. Brownfield sites in the urban area should be identified as soon as possible. The register should be public, with full details of ownership. All brownfield sites owned by Guildford Borough Council, Surrey County Council or other government entities should be considered as available development land within the first 5 years of the plan.

Residential

I do not believe that the target of 1,172 homes in the town centre takes account of the need and demand for urban housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town. This will help to sustain the retail core. The Town Centre policy needs to maximise the potential for residential development on brownfield. It must include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015 which has recently been adopted by GBC. We consider that the Town Centre has the capacity for the higher of at least 50% of the total or at least 5,000 homes. At present, the plan is to impose 70% of new residential development on greenfield and Green Belt land.

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16 POLICY E7 TOWN CENTRE

16.1 I object to the changes in Policy E7 Guildford Town Centre

16.2 I am of the opinion that policy E7 is still very ill-informed and there is insufficient evidential support to objectively assess the capacity of the existing town centre to accommodate appropriate new development and therefore fails the requirements of Section 161 of the NPPF to assess the real quantitative and qualitative floor space needs.

16.3 Policy E7 is still an aspirational voice from the past and is unlikely to benefit the health of the town centre in the future. There is no reliable evidence provided that the retail core of the Town Centre needs or can be expanded by 41,000 sq m of retail space at North Street because of lack of demand for retail units in the Town Centre particularly large units. This is due to falling demand for retail space in Guildford and town centres throughout the country evidenced by independent research and the reality of empty shops in many high streets (including Guildford) and the accelerating competition from internet shopping.

16.4 The recent Carter Jonas Study Retail Study 2017 update predicts total demand for Guildford Town Centre by 2020 at only 3,313 sq m and only 34,811 sq m by 2036. We have now been waiting some 15 years + for demand to catch up to enable development of North Street where the old consent for some 40,000 sq m of retail had to be renewed because it was getting out of date. Are we now going to have to wait till 2036 only another 19 years for demand to get to the point to enable development of this much prized site which developers have not exactly been falling over themselves to develop. That is also assuming that all retail demand in the Town Centre is wanting just this site.

16.5 However optimistically and quite illogically they protest that “there still remains significant capacity to support new comparison goods floorspace over the plan period”. It’s a bit like saying in town x we have currently 100,000 m of shopping and the UK retail forecast done by Experian shows that we can predict a growth of 10% therefore this means we must have an additional 10,000 sq m in town x. This is unscientific guess work.
16.6 In table 2 Appendix 6 of their report we learn that there is a potential for turnover to reach £856.3m in the town centre by 2020 however actual committed floorspace take up accounts for only £1.3m of this. This is 0.15%. It is hardly surprising that there are no details of take up or real demand evidence given anywhere in the report.

16.7 The Carter Jonas report is based on broad brush retail capacity forecasting derived from work by Experian which is very far from site or location specific and as a retail supply and demand assessment in my view is totally unreliable. The source is not even Guildford specific or even Surrey specific. The authors of the report do not disagree with my cynicism with capacity forecasting since they state up front that “It should be noted at the outset that capacity forecasts carried out over a long period of time are inherently less certain and should be treated with caution” and repeated again “at the outset we advise that all capacity forecasts beyond a five year period should be treated with caution. This is because long term trends in the economy, consumer demand and retail property market could have a significant impact on the potential capacity and need for new retail floorspace. For example, as discussed previously, a higher growth in non-store retail sales (i.e. Internet sales) than forecast by Experian would reduce the capacity for new retail floorspace over time.”

16.8 The Carter Jonas report is a vague whitewash report for a pre-conceived and outdated concept of increased retail development in the town centre. “For comparison goods, we have assumed the same estimations for convenience goods expenditure ‘inflow’ (10%) for Guildford Town Centre, again based on the centre’s role as a popular shopping and visitor destination.” Coming to the vague conclusion that Guildford is popular is far from reliable property market research!

16.9 The closest thing I can find to evidence of actual demand in this report is to read “In addition to focusing their attention on larger, dominant centres, many of the multiples and traditional high street retailers are changing their store formats and locational requirements. For example, key anchor retailers such as Boots, Next, Mothercare, TK Maxx, John Lewis and Marks & Spencer are actively seeking larger format units to showcase their full product range and to provide an exciting shopper environment backed by the latest (digital) technology.” But I then I realise this statement applies to any of 100 centres in the UK. I am concerned as to whether the authors of this retail study have actually visited Guildford or know where it is?

16.10 In their 2014/2015 reports Carter Jonas provided a fairly inaccurate picture of retail demand (originally Appendix 6) with the inclusion of retailers who had either gone bust or actually specified demand requirements in centres other than Guildford. This I note has now been deleted presumably because of its inaccuracies which were dealt with in my 2016 objection and has not been updated. We are now left with no demand assessment from either small, medium sized or large retailers. This does not support the view that Guildford is a vibrant retail destination requiring expansion with a large retail development in North Street.

16.11 The reality is that the town centre has enough retail floor space. If more is introduced it will result in the closure of existing shops particularly in locations which are less than 50% of peak Zone A or 100% positions. What Guildford needs is a new focus on speciality high quality comparison shopping supported by a revival of Guildford’s attractive heritage core and a new major visitor attraction supported by restaurants. Guildford needs to become the quality shopping destination for Surrey.

16.12 The existing site in North Street should be replaced with a well-designed ground floor high quality speciality retail mall and frontage of no more than 40 shops extending to 10,000 sq m with the rear and upper floors providing an additional 600 homes. The proportion of the above proposed smaller scheme at North Street will be complementary to and not antagonistic to the Upper High Street, Tunsgate, the Debenhams site and the 100% Zone A positions of the Lower High Street. If the existing policy under E7 is adopted the North Street site will remain empty for another 10 years.

16.13 I also object to the continued failure of this policy to provide much needed substantial residential development in the Town Centre which is still only a modest target of 1,300 homes. Only approximately 10% of the total planned for the Borough. There is still a blind over concentration on retail expansion which fails to take account of market forces and a complete failure to grasp the reality that a residential expansion is required to stimulate retail/leisure demand in the Town Centre which is markedly losing out to nearby centres such as Woking which has a very different approach. See the Town Centre Opportunity in next section.

16.14 I object to the deletion of the vision statement “Guildford town centre has a unique setting and historical character, and is at the centre of one of the most prosperous counties in England. We will protect and build on these assets and insist that all new development will be of the highest design and environmental standards. We will be proactive in building a
great town centre which connects to the amenity of the riverside. We will invest in creating high quality public realm. We will put people above traffic and we will promote new high quality retail and business development. To achieve this we will develop innovative funding and delivery bodies. As we embark together towards this exciting future we pledge that we will continue and extend an active dialogue with our residents and other stakeholders.” Guildford Town Centre needs a decent vision. Without a vision the Town Centre is flying blind and it demonstrates the failure of the potential for imaginative Town development in this latest draft plan.

16.15 I support the deletion of paragraph 4.4.86 since many of the sites along the River Wey are capable of full development

16.16 I object to the deletion of the Allies and Morrison Masterplan as a source document for the plan since although it failed to fully exploit the development potential of the Town Centre it did include many good ideas including more extensive brownfield development extending to 2551 homes including Woodbridge Meadows as a residential development site.

16.17 I do not consider that the modest target of 1,300 homes in the town centre takes account of the need and demand for housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town which will in itself help to sustain the retail core by increased economic impact. What the town centre needs in terms of urban regeneration is much more residential development. As can be seen from the previous section, retail will not work!

16.18 The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015 which was originally adopted by GBC. The reality is that the Town Centre and other areas of brownfield in the borough has the capacity for at least 5,000/ 7,500 homes.

16.19 The additional target capacity of 5,000 could easily be provided within the following urban sites which have the capacity for 7,500 homes:

- 1000 windfall infill (50 per annum)
- 1000 homes saved in the urban area if 100% of students are accommodated on Surrey University campus (17 ha of car parks)
- 500 homes at North Street
- 2,500 homes detailed in Masterplan 2015 including Woodbridge Meadows which can itself be increased substantially
- 1000 homes on current GBC car parks (25 acres) and at the station
- 1000 homes at Slyfield on the 40 ha regeneration site
- 500 homes on brownfield sites in villages on sites of max 1ha which do not impact Green Belt

16.20 Yes, we need a new Local Plan for our borough in order to provide a development strategy within which we can accommodate our local housing, economic and environmental needs. But first we must make 100% use of our urban brownfield in the town before we consider building in the Green Belt or countryside.

16.21 Paragraph 80 of the NPPF clearly states that Green Belt serves a key purpose, “to assist in urban regeneration, by encouraging the recycling of derelict land and other urban land”. In order to comply with central planning policy we need a brownfield strategy that states clearly. “We are committed to a brownfield first initiative whereby all applications on previously developed land are given fast track priority and every facility to promote development for residential purposes and employment purposes in order to satisfy the needs of local people. In parallel a zero CIL incentive should be given for all residential development on brownfield land.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Policy E7 - Guildford Town Centre

I object. There should be more of a residential allocation in Guildford town centre which is where the young want to live. There is a need to use brownfield sites for residential development before considering development outside the urban area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to Policy E7 Guildford Town Centre

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside. There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion. The policy also fails to provide guidance on design requirements, as required by the NPPF. The policy and surrounding text concentrates too much on shopping without regard to its nature and should encourage a wider variety of small businesses and shops.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I OBJECT to this policy

There should be much more residential use of the town centre. There is limited need for further retail, which will disadvantage existing retailers as well as using valuable land inefficiently. There is an urgent need for a brownfield register and to focus on brownfield redevelopment before considering development outside the existing urban area. CIL strategy must promote brownfield redevelopment.
The government committed to legislating for a ‘brownfield register’ of ‘land suitable for housing in the Queen’s Speech 2015 and the 73 councils piloting the brownfield register were announced in March, 2016. Section 151 of the Act permits regulations requiring LPAs to keep a register of particular kinds of land, of which the brownfield register will be one. There is no reference to a brownfield policy within the policy for Guildford Town Centre, which is a major flaw.

**Retail**

Policy E7 is ill-informed. The evidence base fails to assess the capacity of the existing town centre to accommodate appropriate new development objectively. Paragraph 161 of the NPPF requires the LPA to assess the real quantitative and qualitative needs for economic activity including retail and leisure development, and I consider that this requirement has not been met.

Policy E7 is unlikely to benefit the health of the town centre in the future. There is no reliable evidence provided that the retail core of the Town Centre can support expansion of 45,000 sq m of additional retail space at North Street. There is a lack of demand for retail units in the Town Centre particularly large units.

There is falling demand for retail space in Guildford and town centres throughout the country (as evidenced by independent research and the reality of empty shops in many high streets (including Guildford) and the accelerating competition from internet shopping – see CEBR studies).

The North Street scheme has repeatedly failed in various redevelopment proposals over the last ten years. This is evidence of a lack of demand, such that the original planning permission for a large retail scheme became time expired. A number of major developers have studied the proposals in detail and then withdrawn from negotiations because the proposals are not economically viable.

The reality is that the town centre has enough retail floor space. If more is introduced it will result in the closure of existing shops particularly in locations which are less than 50% of peak Zone A or 100% positions.

What Guildford needs is a new focus on speciality high quality comparison shopping supported by a revival of Guildford’s attractive heritage core and the historic visitor attractions supported by restaurants.

The existing site in North Street should be replaced with a well-designed ground floor high quality speciality retail mall and frontage of no more than 40 shops extending to 7,000 sq m with the rear and upper floors providing an additional 500 to 600 homes. The proportion of the above proposed smaller scheme at North Street will be complementary to and not antagonistic to the Upper High Street, Tungsgate, the Debenhams site and the 100% Zone A positions of the Lower High Street. If the existing policy under E7 is adopted the North Street site will remain empty for another 10 years.

The findings of the Guildford Retail and Leisure Study 25 September 2015 are very pessimistic about retail trends. Carter Jonas’s recent study reports a bad time for retail. GBC’s own evidence base demonstrates that there is limited demand for additional retails space. The bullet points below are direct quotes from the report:

- Para 3.3 Retail Trends “Town centres, once the principle focus for retail and leisure are now increasingly under threat”
- Para 3.4 Retail Expenditure “disposable income and retailers’ margins are being squeezed further”
- Para 3.5 “there has been limited growth in retail (convenience and comparison goods) expenditure per head since 2008”
- Para 3.6 “the retail sector remains fragile and analysts forecast that some operators and centres will continue to struggle over the short to medium term”
- Para 3.8 “completed new shopping centre floor space in the UK is currently at its lowest level since the 1990s”
- Para 3.11 Internet Shopping “New forms of retailing have also emerged in recent years and are becoming established as significant alternatives to more traditional ‘bricks and mortar’ shopping facilities. Over the last 5 years, online sales have increased by 222%”

Appendix 6 of the Retail Study indicates inaccurate demand data
Para 5.29 “The latest CoStar Report recorded 64 requirements for Guildford from January 2013 to August 2014; representing a total maximum floor space requirement of 62,208m2 gross (see Appendix 6).”

This looks in the main unpersuasive with brands such as Joules Clothing; Fossil; Comptoir des Cotonniers; Moshulu; Rituals; Princesse tam.tam; Cycle Surgery; Majestic Wine; Game Stores Group Ltd; Iceland. But if we look closely at Appendix 6 it is an amalgam of old unchecked national high street requirements some of which do not even include Guildford as a destination and most is hardly high quality comparison retail. There are also no “big” requirements in terms of space. Where are the big stores?

GH Pressley & Sons – Watches and Silver - Requirement “They are seeking a flagship diamond store in central London. Target locations include Mayfair, St James, Kensington and Knightsbridge. Brands will include Hans D Krieger and Marco Bicego.” This does not sound like Guildford

Oxygen Red Ltd – Ladieswear- Requirement “Oxygen Red is looking to acquire temporary stores in Shopping Centre locations within the M25” Guildford is well outside the M25

Game Stores Group Ltd have apparently a requirement for a store in Guildford dated 2012 but the company entered administration on 26 March 2012, and 277 of Game's 609 UK stores were closed immediately, resulting in 2,104 job losses. Are they really looking?

The data relating to retail demand does not appear reliable. The 62,800 sq m does not translate to real demand for an expansion of 500,000 sq ft. If proper due diligence was applied perhaps 10% of this Carter Jonas requirement would survive

Brownfield redevelopment

We must make full use of our urban brownfield before we consider building in the Green Belt or countryside. Paragraph 17 of the NPPF states that to “encourage the effective use of land by reusing land that has been previously developed (brownfield land)” is a core planning principle. Paragraph 80 of the NPPF clearly states that Green Belt serves a key purpose, “to assist in urban regeneration, by encouraging the recycling of derelict land and other urban land”. In order to comply with central planning policy we need a brownfield strategy.

In response to the detailed objections received in the Regulation 18 process of the 2014 Local Plan and also in accordance with government policy a Guildford brownfield land register should be urgently compiled showing address, ownership, occupier, current use and detailed planning brief.

- GBC needs to accelerate residential redevelopment at Woodbridge Meadows, Walnut Tree Close and the Station within the next 1 to 5 years
- GBC needs to examine the residential development opportunity of the 25.7 acres of car parks in GBC ownership
- A brownfield-first policy should underlie all planning decisions and the default for non-brownfield land should be rejection
- Failure to promote brownfield-first is unsustainable and is contrary both to the policies of the Metropolitan Green Belt (still in force) and NPPF paragraph 80 and 84.

My recommendation is for a new Brownfield Policy for the town centre, a brownfield-first initiative. All applications on previously developed land within the urban settlement area should be given fast-track priority. Development of urban brownfield land should be prioritised for residential and employment purposes to satisfy the needs of local people.

In parallel a zero-CIL incentive should be given for all residential development on urban brownfield land in order to meet the NPPF requirement for urban regeneration. Brownfield sites in the urban area should be identified as soon as possible. The register should be public, with full details of ownership. All brownfield sites owned by Guildford Borough Council, Surrey County Council or other government entities should be considered as available development land within the first 5 years of the plan.”

Residential

I do not believe that the target of 1,172 homes in the town centre takes account of the need and demand for urban housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town. This will help to sustain the retail core. The Town Centre policy needs to maximise the potential for residential development on brownfield. It must include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015 which has recently been adopted by GBC. I consider that the Town Centre has the
capacity for the higher of at least 50% of the total or at least 5,000 homes. At present, the plan is to impose 70% of new residential development on greenfield and Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1128  Respondent: 8860897 / Julia Shaw  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? (No), is Sound? (No), is Legally Compliant? (No)

1. I object to the changes in Policy E7 Guildford Town Centre
2. I am of the opinion that policy E7 is still very ill-informed and there is insufficient evidential support to objectively assess the capacity of the existing town centre to accommodate appropriate new development and therefore fails the requirements of Section 161 of the NPPF to assess the real quantitative and qualitative floor space needs.
3. Policy E7 is still an aspirational voice from the past and is unlikely to benefit the health of the town centre in the future. There is no reliable evidence provided that the retail core of the Town Centre needs or can be expanded by 41,000 sq m of retail space at North Street because of lack of demand for retail units in the Town Centre particularly large units. This is due to falling demand for retail space in Guildford and town centres throughout the country evidenced by independent research and the reality of empty shops in many high streets (including Guildford) and the accelerating competition from internet shopping.
4. The recent Carter Jonas Study Retail Study 2017 update predicts total demand for Guildford Town Centre by 2020 at only 3,313 sq m and only 34,811 sq m by 2036. We have now been waiting some 15 years + for demand to catch up to enable development of North Street where the old consent for some 40,000 sq m of retail had to be renewed because it was getting out of date. Are we now going to have to wait till 2036 only another 19 years for demand to get to the point to enable development of this much prized site which developers have not exactly been falling over themselves to develop. That is also assuming that all retail demand in the Town Centre is wanting just this site.
5. Howeveroptimistically and quite illogically they protest that “there still remains significant capacity to support new comparison goods floorspace over the plan period”. It’s a bit like saying in town x we have currently 100,000 m of shopping and the UK retail forecast done by Experian shows that we can predict a growth of 10% therefore these means we must have an additional 10,000 sq m in town x. This is unscientific guess work.
6. In table 2 Appendix 6 of their report we learn that there is a potential for turnover to reach £856.3m in the town centre by 2020 however actual committed floorspace take up accounts for only £1.3m of this. This is 0.15%. It is hardly surprising that there are no details of take up or real demand evidence given anywhere in the report.
7. The Carter Jonas report is based on broad brush retail capacity forecasting derived from work by Experian which is very far from site or location specific and as a retail supply and demand assessment in my view is totally unreliable. The source is not even Guildford specific or even Surrey specific. The authors of the report do not disagree with my cynicism with capacity forecasting since they state up front that “It should be noted at the outset that capacity forecasts carried out over a long period of time are inherently less certain and should be treated with caution” and repeated again “at the outset we advise that all capacity forecasts beyond a five year period should be treated with caution. This is because long term trends in the economy, consumer demand and retail property market could have a significant impact on the potential capacity and need for new retail floorspace. For example, as discussed previously, a higher growth in non-store retail sales (i.e. Internet sales) than forecast by Experian would reduce the capacity for new retail floorspace over time.”
8. The Carter Jonas report is a vague whitewash report for a pre-conceived and outdated concept of increased retail development in the town centre. “For comparison goods, we have assumed the same estimations for convenience goods expenditure ‘inflow’ (10%) for Guildford Town Centre, again based on the centre’s role as a popular shopping and visitor destination.” Coming to the vague conclusion that Guildford is popular is far from reliable property market research!
9. The closest thing I can find to evidence of actual demand in this report is to read “In addition to focusing their attention on larger, dominant centres, many of the multiples and traditional high street retailers are changing their store formats and locational requirements. For example, key anchor retailers such as Boots, Next, Mothercare, TK Maxx, John Lewis and Marks & Spencer are actively seeking larger format units to showcase their full product range and to provide an exciting shopper environment backed by the latest (digital) technology.” But I then realise this statement applies to any of 100 centres in the UK. I am concerned as to whether the authors of this retail study have actually visited Guildford or know where it is?

10. In their 2014/2015 reports Carter Jonas provided a fairly inaccurate picture of retail demand (originally Appendix 6) with the inclusion of retailers who had either gone bust or actually specified demand requirements in centres other than Guildford. This I note has now been deleted presumably because of its inaccuracies which were dealt with in my 2016 objection and has not been updated. We are now left with no demand assessment from either small, medium sized or large retailers. This does not support the view that Guildford is a vibrant retail destination requiring expansion with a large retail development in North Street.

11. The reality is that the town centre has enough retail floor space. If more is introduced it will result in the closure of existing shops particularly in locations which are less than 50% of peak Zone A or 100% positions. What Guildford needs is a new focus on speciality high quality comparison shopping supported by a revival of Guildford’s attractive heritage core and a new major visitor attraction supported by restaurants. Guildford needs to become the quality shopping destination for Surrey.

12. The existing site in North Street should be replaced with a well-designed ground floor high quality speciality retail mall and frontage of no more than 40 shops extending to 10,000 sq m with the rear and upper floors providing an additional 600 homes. The proportion of the above proposed smaller scheme at North Street will be complementary to and not antagonistic to the Upper High Street, Tunsgate, the Debenhams site and the 100% Zone A positions of the Lower High Street. If the existing policy under E7 is adopted the North Street site will remain empty for another 10 years.

13. I also object to the continued failure of this policy to provide much needed substantial residential development in the Town Centre which is still only a modest target of 1,300 homes. Only approximately 10% of the total planned for the Borough. There is still a blind over concentration on retail expansion which fails to take account of market forces and a complete failure to grasp the reality that a residential expansion is required to stimulate retail/leisure demand in the Town Centre which is markedly losing out to nearby centres such as Woking which has a very different approach. See the Town Centre Opportunity in next section.

14. I object to the deletion of the vision statement “Guildford town centre has a unique setting and historical character, and is at the centre of one of the most prosperous counties in England. We will protect and build on these assets and insist that all new development will be of the highest design and environmental standards. We will be proactive in building a great town centre which connects to the amenity of the riverside. We will invest in creating high quality public realm. We will put people above traffic and we will promote new high quality retail and business development. To achieve this we will develop innovative funding and delivery bodies. As we embark together towards this exciting future we pledge that we will continue and extend an active dialogue with our residents and other stakeholders.” Guildford Town Centre needs a decent vision. Without a vision the Town Centre is flying blind and it demonstrates the failure of the potential for imaginative Town development in this latest draft plan.

15. I support the deletion of paragraph 4.4.86 since many of the sites along the River Wey are capable of full development

16. I object to the deletion of the Allies and Morrison Masterplan as a source document for the plan since although it failed to fully exploit the development potential of the Town Centre it did include many good ideas including more extensive brownfield development extending to 2551 homes including Woodbridge Meadows as a residential development site.

17. I do not consider that the modest target of 1,300 homes in the town centre takes account of the need and demand for housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town which will in itself help to sustain the retail core by increased economic impact. What the town centre needs in terms of urban regeneration is much more residential development. As can be seen from the previous section, retail will not work!

18. The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015 which was originally adopted by GBC. The reality is that the Town Centre and other areas of brownfield in the borough has the capacity for at least 5,000/ 7,500 homes.
19. The additional target capacity of 5,000 could easily be provided within the following urban sites which have the capacity for 7,500 homes:
20. 2,500 homes detailed in Masterplan 2015 including Woodbridge Meadows which can itself be increased substantially
   • 500 homes at North Street
   • 1000 homes on current GBC car parks (25 acres) and at the station
   • 1000 homes saved in the urban area if 100% of students are accommodated on Surrey University campus (17 ha of car parks)
   • 1000 homes at Slyfield on the 40 ha regeneration site
   • 1000 windfall infill (50 per annum)
   • 500 homes on brownfield sites in villages on sites of max 1ha which do not impact Green Belt

1. Yes, we need a new Local Plan for our borough in order to provide a development strategy within which we can accommodate our local housing, economic and environmental needs. But first we must make 100% use of our urban brownfield in the town before we consider building in the Green Belt or countryside.
2. Paragraph 80 of the NPPF clearly states that Green Belt serves a key purpose, “to assist in urban regeneration, by encouraging the recycling of derelict land and other urban land”. In order to comply with central planning policy we need a brownfield strategy that states clearly. “We are committed to a brownfield first initiative whereby all applications on previously developed land are given fast track priority and every facility to promote development for residential purposes and employment purposes in order to satisfy the needs of local people. In parallel a zero CIL incentive should be given for all residential development on brownfield land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5776  Respondent: 8865377 / Angus Mcintosh  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E7
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Trends in retailing; On-Line retailing is totally changing what makes a retail town centre successful; big is NOT necessarily better, and creates far more traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11380  Respondent: 8865537 / P Waldner  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E7
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.
There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object.

Commercial brown-belt land in the urban area should be used for housing wherever possible and it is difficult to see how an additional 45,000 sq m of additional retail space can be justified, especially in the light of rapid increasing in on-line shopping.

The council should plan to utilise key brown-field opportunities within central Guildford for new housing instead of the proposed large scale building on protected green-belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
There are sites available in Guildford Town Centre earmarked for further commercial and retail development which could instead support affordable small houses and flats for young buyers, close to the town’s amenities and existing infrastructure. The council have not demonstrated a need for further retail space when increasing numbers of shoppers are buying online and the need for first time buyer’s properties is much greater.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9331  
Respondent: 8892737 / David Eagle  
Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16976  
Respondent: 8893057 / Dianne Garnett  
Agent:

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 E7 Guildford Town Centre

1.2 We are of the opinion that policy E7 is ill-informed and there is insufficient evidential support to objectively assess the capacity of the existing town centre to accommodate appropriate new development and therefore fails the requirements of Section 161 of the NPPF to assess the real quantitative and qualitative floor space needs.

1.3 Policy E7 is an aspirational voice from the past and is unlikely to benefit the health of the town centre in the future. There is no reliable evidence provided that the retail core of the Town Centre needs or can be expanded by 45,000 sq m of retail space at North Street because of lack of demand for retail units in the Town Centre particularly large units. This is due to falling demand for retail space in Guildford and town centres throughout the country evidenced by independent research and the reality of empty shops in many high streets (including Guildford) and the accelerating competition from internet shopping.

1.4 The failure of the North Street scheme to be redeveloped over the last ten years is a testament to lack of demand which has been so poor that the original planning permission for a large retail scheme became time expired.

1.5 The reality is that the town centre has enough retail floor space. If more is introduced it will result in the closure of existing shops particularly in locations which are less than 50% of peak Zone A or 100% positions. What Guildford needs is a new focus on specialty high quality comparison shopping supported by a revival of Guildford’s attractive heritage core and a new major visitor attraction supported by restaurants. Guildford needs to become the quality shopping destination for Surrey.

1.6 The existing site in North Street should be replaced with a well-designed ground floor high quality specialty retail mall and frontage of no more than 40 shops extending to 7,000 sq m with the rear and upper floors providing an additional 500 to 600 homes. The proportion of the above proposed smaller scheme at North Street will be complementary to and not antagonistic to the Upper High Street, Tunsgate, the Debenhams site and the 100% Zone A positions of the Lower High Street. If the existing policy under E7 is adopted the North Street site will remain empty for another 10 year

1.7 The findings of the Guildford Retail and Leisure Study 25 September 2015 are very pessimistic about retail trends. Carter Jonas’s recent retail study reports a fairly bad time for retail, the bullets below are direct quotes from the report:1. Para 3.3 Retail Trends “Town centres, once the principle focus for retail and leisure are now increasingly under threat”2. Para 3.4 Retail Expenditure “disposable income and retailers’ margins are being squeezed further”3. Para 3.5 “there has been limited growth in retail (convenience and comparison goods) expenditure per head since 2008”4. Para 3.6 “the retail sector remains fragile and analysts forecast that some operators and centres will continue to struggle over the short to medium term”5. Para 3.8 “completed new shopping centre floor space in the UK is currently at its lowest level since the 1990s”6. Para 3.11 Internet Shopping “New forms of retailing have also emerged in recent years and are becoming established as significant alternatives to more traditional ‘bricks and mortar’ shopping facilities. Over the last 5 years, online sales have increased by 222%”

1.8 Despite the findings about retail we are told “evidence suggests that high quality schemes will continue to prosper.” What evidence?

1.9 Para 3.33 “the latest 2013-14 Javelin VenueScore17 ranks Guildford Town Centre within the UK’s top 50 shopping locations at 33. By contrast, Kingston-Upon-Thames is ranked 17th. Since 2007, Guildford Town Centre has fallen 20 places in the Venue Score ranking”

1.10 Para 3.40 “The growth of online shopping is also impacting on the vitality and viability of many of Britain’s centres and high streets. This is placing pressures on rental growth and market demand in many centres, particularly secondary centres outside the ‘top 100’ shopping locations. This has been further compounded by rising vacancy levels and the loss of key retailers. As a result, the share of non-food retail sales conducted through town centre shops has declined, from 64% in 2002 to just over 40% by 2013. In our opinion, a far more uncertain future awaits the next “wave” of new retail investment and development. The evidence suggests that high quality schemes in the strongest prime shopping locations will continue to prosper.” Is this not an aspirational assumption?
1.11 Para 3.41 “Notwithstanding the threat of online shopping, industry experts still predict that the demand from major retailers for new space will continue as it remains the primary mechanism for retailers to ‘reach’ their customers and grow their businesses.” Who are these industry experts? Is this not an outdated concept and merely an aspiration of the British Council of Shopping Centres (BCSC)?

1.12 Appendix 6 of the Retail Study indicates potentially inaccurate demand data

1.13 Para 5.29 “The latest CoStar Report recorded 64 requirements for Guildford from January 2013 to August 2014; representing a total maximum floor space requirement of 62,208m2 gross (see Appendix 6).”

1.14 The Appendix 6 list of retailer demand looks impressive with brands such as Joules Clothing; Fossil; Comptoir des Cotonniers; Moshulu; Rituals; Princesse tam.tam; Cycle Surgery; Majestic Wine; Game Stores Group Ltd; Iceland. However, if we look closely at Appendix 6 it is an amalgam of old unchecked national high street requirements some of which do not even include Guildford as a destination and the majority are hardly high quality comparison retail. There are also no “big” requirements in terms of space. Where are the big stores?

1.15 GH Pressley & Sons – Watches and Silver- Requirement “They are seeking a flagship diamond store in central London. Target locations include Mayfair, St James, Kensington and Knightsbridge. Brands will include Hans D Krieger and Marco Bicego.” This does not sound like Guildford.

1.16 Oxygen Red Ltd – Ladieswear- Requirement “Oxygen Red is looking to acquire temporary stores in Shopping Centre locations within the M25” Guildford is well outside the M25.

1.17 The data relating to retail demand does not appear reliable. The 62,800 sq m does not translate to real demand for an expansion of 500,000 sq ft. If proper due diligence was applied perhaps 30% of this alleged Carter Jonas requirement would survive proper scrutiny.

2. THE TOWN CENTRE OPPORTUNITY

2.1 We do not consider that the target of 1,172 homes in the town centre takes account of the need and demand for housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town which will in itself help to sustain the retail core by increased economic impact. What the town centre needs in terms of urban regeneration is much more residential development. As can be seen from the previous section retail will not work!

2.2 The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015 which has recently been adopted by GBC. The reality is that the Town Centre and other areas of brownfield in the borough has the capacity for at least 5,000/ 7,500 homes.

2.3 The additional target capacity of 5,000 could easily be provided within the following urban sites which have the capacity for 7,500 homes:

- 2,500 homes detailed in Masterplan 2015 including Woodbridge Meadows which can itself be increased substantially
- 500 homes at North Street
- 1000 homes on current GBC car parks (25 acres) and at the station
- 1000 homes saved in the urban area if 100% of students are accommodated on Surrey University campus (17 ha of car parks)
- 1000 homes at Slyfield on the 40 ha regeneration site
- 1000 windfall infill (50 per annum)
- 500 homes on brownfield sites in villages on sites of max 1ha which do not impact Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
14. POLICY E7

I OBJECT to Policy E7 Guildford Town Centre
The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done.

However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy. There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

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Attached documents:

Comment ID: PSLPP16/8159  Respondent: 8902465 / Linda Slater  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E7  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY E7 (TOWN CENTRE):

• No statement in policy wording of value of Guildford’s rural setting and views.
• No consideration of Town Centre Master Plan, GVG proposals or station redevelopment plans.
• Proportion of new housing in town far too small. Development pushed into countryside, ruining the latter and harming urban regeneration.

4

• No brownfield register.
• Too much big retail, despite online shopping revolution and decline of traditional high streets internationally. Futile to try to turn Guildford into Woking or Kingston.
• No measures to support small, niche retailers in town, e.g. through business rates.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18531  Respondent: 8903265 / Susan Anderson  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E7  
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: PSLPP16/15048  Respondent: 8904129 / Elizabeth Ross  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

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: PSLPP16/18439  Respondent: 8909761 / Diana Grover  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

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Comment ID: PSLPP16/11212  Respondent: 8910145 / Mr G.W. & Mrs A.C. Spratt  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the expansion of commercial land in the urban area losing the potential for further housing. Policy E7: Guildford Town Centre

There is no reliable evidence provided that the retail core of the Town Centre can support expansion of 45,000 sq m of additional retail space at North Street.

Online retail is set to account for 21.5% of total retail sales by 2018 from 12.7% in 2013, the highest online retail share in the world according to the Centre for Retail Research. March 2016, online sales rose 12.3%, and it was the third consecutive month in which more than 20% of all non-food shopping took place online, (British Retail Consortium and accounting firm KPMG) With such a high retailers will need just 70 high street stores to create a national presence compared to 250 in the mid 2000's. An expansion on such a scale is negligent when the Council claims to be in such desperate need for housing.

Retail is a declining industry and should not be invested in by the Borough at the expense of housing in the most sustainable urban location, near employment and transport hubs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12073  Respondent: 8914945 / Nichola Armstrong  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Policy E7 because the 40% increase in retail is out of line with the demise of bricks and mortar retail shopping. By 2020 The British Consortium expects a one third decline in retail jobs due to the 13% increase in Internet retail. The continual increase in rents, running costs, the increase in the minimum wage, changing patterns in shopping make is necessary for retailers to expand their internet side of their business. The recent closures of well known brands highlight the changes in our shopping habits. So people spend it is essential more homes are needed in Guildford. Retail space needs to be significantly reduced. GBC put a Waitrose in the middle of Guildford, so now people drive in collect their shopping and drive out. They don't wander around the Town Centre, a huge mistake. The Guildford Farmers Market is struggling with at least 6 stallholders not returning this year and North Street Market that buzzed on Saturdays is feeling the Waitrose effect. If you don't build homes in the Town and surrounding urban area, Guildford will continue to decline. Look what happened to Aldershot when they built a shopping centre and a giant car park, lost its market town identity by demolishing the homes for a carbuncle in the middle of it. All the small quirky shops left.

Tunsgate is another example of a disaster waiting to happen. Guildford Planning must sort out their brownfield register urgently. A number of investors have already pulled out of the regeneration of North Street because they know it's not economically viable. Don't make Guildford look like every other boring uninteresting town with the same large franchises so it looks like everywhere else.

The Plan must address the regeneration of Guildford Town Centre and the urban areas first before destroying the rural countryside. (Planning guidance from the government, brownfield sites should be developed first).

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X. I object to the quantity of space allocated for retail in the town centre. Retail is changing and the need for "bricks and mortar" reducing. This space could be much better utilised as a sustainable residential space within easy walking distance of employment and establish transport links.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<th>Comment ID: PSLPP16/11992</th>
<th>Respondent: 8921377 / Paul Maycox</th>
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Attached documents:

Comment ID: PSLPP16/10994  Respondent: 8926401 / Christine Medlow  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

E7 Guildford Town Centre

The 45,000sqm of retail (comparison) shopping proposed for the N Street site is too much. The need is for more residential. In addition it is essential to increase convenience, day to day, shopping in the centre for residents like me and my neighbours who have nowhere to do this shopping except in the centre – unless we drive out of our area. The decline in convenience and service shopping facilities continues, despite the arrival of Waitrose.

I do not wish to see evening and night-time activities along the immediate riverside. This would require railing in of the river for safety purposes, and provisions made to safeguard clients during a flood event when the area can be quite frightening. The genuine attractive and green riverside, with its green banks and important biodiversity would be lost. I do not object to such activities in the area providing they are reasonably set back from the river and are outside of the flood zone.
I am concerned about promoting additional “active” use of the riverside and river. The river is a comparatively narrow navigation, and does not have the capacity to take more boating activity than at present. The attractive towpath is already well used by walkers and cyclists.

While supporting the intent behind the banning of new food takeaways within 500m of schools, I do not think this is practical. There are a number of schools close to the centre, including the Royal Grammar School and Pewley Down Infants School, and this rule would ban takeaways from much of the centre.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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**Comment ID:** PSLPP16/15150  **Respondent:** 8926529 / Annie Cross  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

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**Policy E7 - Guildford Town Centre**

I object that GBC do not accept the town centre as the perfect place for sustainable development. Internet shopping has changed the retail landscape and that will continue in the future so limited new shops are required. Guildford will have ample opportunity to provide sustainable homes over the Local Plan period on brownfield sites.

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**Comment ID:** pslp171/2387  **Respondent:** 8928961 / Sue Reeve  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy E7

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**Approach**

Why is Guildford Borough Council so determined to provide larger shopping “experience” to enhance the town? If suitable “in town” apartment complexes were built a wonderful atmosphere could be developed making Guildford “the” place to live. This alone would bring huge income to the town and reinvigorate the centre. People want to live in or near the town, not stuck on some development without suitable transport links. The opportunities for alternative proposals are huge, why is more imagination not being used?

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**Comment ID:** PSLPP16/4463  **Respondent:** 8930209 / Ray Corstin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

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The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17704  Respondent: 8930305 / Elaine Best  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Policy E7: Guildford Town Centre as there appears no real justification for more retail space when we see so many shops either empty or closing down. The nature of online shopping is changing the way people shop.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8775  Respondent: 8933185 / Peter See  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

4.4.67 Policy E7: Guildford Town Centre
By 2033, Guildford town centre will have:

Note: After these words the listed items end with a mixture of full stops, semi-colons or nothing. You should have a standard format.

Outside of: outside

4.4.79

for comparison retail need: for retail need

have review: have to review

comparison floorspace: extra floorspace

4.4.84

retail offer: retail sector

to this diversification: to diversification

outside of: outside

outside of: outside

outside of: outside

Outside of: outside

4.4.84

retail offer: retail sector

to this diversification: to diversification

outside of: outside

outside of: outside

outside of: outside

Page 87 Monitoring Indicators

out of centre: outside the centre

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13275  Respondent: 8933953 / Stephanie Billington  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to this policy. In its concentration on shopping the policy fails to take into account the irreversible move to online shopping, so that further retail space is unnecessary, particularly with recent spectacular failures. This is likely to be a continuing trend. The key would be in revitalising niche shopping in keeping with Guildford's historic setting and using underused commercial space for housing in the town centre where most people especially the young and the older want to live and where the facilities and infrastructure exist to support it. This in turn will help to revitalise the town centre. Your vision recognised that the ideal position is for development to take place within existing urban boundaries. I support this policy wholeheartedly as one who's intention is to move into an urban area within the next 10 years to be closer to amenities and able to function using public transport and without a car. In the plan, I expected to already to see
this work - a real determination to find, and a detailed analysis of sites in urban areas as your priority focus and I charge you to make this information available to us, the residents. Beyond that, I call on you to think creatively. Car parks do not need to be taking up space above ground. There are examples certainly just across the Channel (eg Chartres) of how urban land can be freed up (and aesthetics improved) by moving car parks underground. Look at how burying the A3 has improved our countryside. I call on you to think creatively and mobilise County and Central Government to do so with you. Yes it will cost money, but what cost destroying the Green Belt? Developers, big and small, need to understand that there is no quick buck to be made out of the Green Belt so that their efforts will turn to regenerating the urban areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

3.2 Retail

Current trends should be leading to a reduction in retail space, rather than an increase. The British Retail Consortium, representing over 80% of the retail sector predicted a shrinking from 559 million square feet of retail space in Britain in 2010 to 527 in 2020.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

We cannot support the expansion of retail space in Guildford Town Centre as this flies in the face of current trends. We would prefer to see the more residential development in Guildford Town Centre.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
9. I object to the quantity of space allocated for retail in the town centre. This could be much better used for residential development. I particularly object to the reliance on the Carter Jonas study update 2017 which includes “demand” for retail space from companies already in administration.

10. Para 2.10a underestimates the pressure already suffered by local residents on a daily basis as a result of insufficient infrastructure particularly in the provision of health services, e.g. doctors and hospital appointments. Additional growth in the quantum proposed is unsustainable in that it fails to recognised the needs of current residents and is focussed only on the needs of future residents.

11. Para 2.13 I reject the statement that most local roads in villages have “at least one footway and usually two “.

12. I reject the assumption in para 2.15 that increased road infrastructure capacity – it may improve theoretical capacity but actually worsens performance.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12632  Respondent: 8945441 / Hazel A. Jarvis  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7 
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am sure you will give due attention to the response of the Guildford Residents Association but I wish to add my voice as someone who has lived in Guildford all my adult life. In the plan there is a misplaced emphasis on retail expansion in the town centre at a time when internet shopping is becoming the norm. We already have too many retail spaces empty and this trend seems likely to continue. What we need are town centre homes which will add life and vibrancy to Guildford and bring local trade to businesses

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9378  Respondent: 8948385 / Gillian Eve  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7 
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy E7: Guildford Town Centre

I OBJECT. There should be much more residential use of the town centre and a focus on brownfield redevelopment before considering development outside the existing urban area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/16165  Respondent: 8948385 / Gillian Eve  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7 
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) 
I OBJECT. There should be much more residential use of the town centre and a focus on brownfield redevelopment before considering development outside the existing urban area. 
What changes (2016)/further amendments (2017) do you suggest should be made to the document? 
Attached documents:

Comment ID: PSLPP16/8053  Respondent: 8954529 / Maggi Moss  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7 
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) 
More homes are needed in the town centre for specific groups of people (students, elderly, key workers) not yet more shops 
What changes (2016)/further amendments (2017) do you suggest should be made to the document? 
Attached documents:

Comment ID: PSLPP16/17306  Respondent: 8967233 / University of Surrey (University of Surrey)  Agent: Terence O'Rourke (Luke Vallins) 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7 
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) 
Generally, the University supports the town centre vision to protect and build on the assets of Guildford Town centre and supports policy E7, given that the continued prosperity and vitality of the town depends on a thriving town centre. 
However, whilst there are good opportunities for development and redevelopment in the centre, which will bring benefits in terms of new uses, new homes of various types, new employment and retail opportunities, improved services and facilities and improved vitality, the University is concerned that the plan should not result in overdevelopment. 
The University is of the view that overdevelopment of the town centre will increase congestion and degrade the environment and quality of life for residents of the town centre as well as visitors and workers. 
Should new homes displace employment this brings other problems, such as providing services such as schools for the increased number of residents, whilst reducing employment in the town centre and displacing this to other sites, perhaps outside the town and borough. 
What changes (2016)/further amendments (2017) do you suggest should be made to the document? 
Attached documents:
3.16 M&G supports the principle of Policy E7 but has some comments for clarification.

The importance of Guildford town centre is recognised in the policy. However, as highlighted in the Council’s own Retail and Leisure study, the Plan should also address the need to maintain and enhance Guildford’s competitiveness as neighbouring centres such as Kingston upon Thames and Woking improve.

3.17 Importantly the town centre is not just about meeting retailing needs. M&G considers that the “overall experience” for visitors must improve as described in the Town Centre Vision extract in paragraph 4.4.74.

3.18 It is correct that the town centre should be the focus for retail developments but it is complementary uses such as food and drink, leisure and cultural uses that add to the liveliness, attractiveness and economic resilience of the centre. New retail-led mixed use schemes are increasingly about creating a distinctive destination and visitor experience as outlined in the Carter Jonas Retail and Leisure study.

3.19 The Plan does not recognise the difference and complementarity of food and drink and leisure uses which are a vital part of new shopping centres as opposed to more freestanding uses that can be spread around the edges of the town centre. It is important therefore that if key objectives such as new cinema or cultural uses are to be realised, they will need to be supported by an increased offer of food and drink to assist commercial viability and not unduly restricted as presently proposed in Policy A6.

3.20 M&G supports the Council’s approach outlined in paragraphs 4.4.83 and 4.4.86.

The town centre will become increasingly more important as a focus of our leisure time, and the enhancement of the riverside, buildings and public spaces between them contribute to this diversification.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Therefore the policy for additional retail facilities within the town centre should be amended and additional affordable housing provided in its place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/13113  **Respondent:** 8993121 / Shelagh Yeomans  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Policy E7: Guildford Town Centre**

I OBJECT to this policy

There should be much more residential use of the town centre. There is limited need for further retail, which will disadvantage existing retailers as well as using valuable land inefficiently. There is an urgent need for a brownfield register and to focus on brownfield redevelopment before considering development outside the existing urban area. CIL strategy must promote brownfield redevelopment

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/11457  **Respondent:** 9062913 / Susan Parker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY E7 Guildford Town Centre

OBJECT. There should be much more residential use of the town centre. There is limited need for further retail, which will disadvantage existing retailers as well as using valuable land inefficiently. Existing niche retailers should be supported, but this does not mean further retail expansion which could be counterproductive. There is an urgent need for a brownfield register and to focus on brownfield redevelopment before considering development outside the existing urban area. CIL strategy must promote brownfield redevelopment. Guildford should strive for high quality definition making it a great centre for people to live in and visit. It would be a great mistake if Guildford were to opt for large impersonal department stores and dull high street chain stores at the expense of exploiting its uniqueness and character which would afford greater benefits.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp171/1867  **Respondent:** 9062913 / Susan Parker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy E7

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 E7 Guildford Town Centre

I consider that policy E7 is still very ill-informed and there is insufficient evidential support to objectively assess the capacity of the existing town centre to accommodate appropriate new development and therefore fails the requirements of Section 161 of the NPPF to assess the real quantitative and qualitative floor space needs.

Policy E7 is still an aspirational voice from the past and is unlikely to benefit the health of the town centre in the future. There is no reliable evidence provided that the retail core of the Town Centre needs or can be expanded by 41,000 sq m of retail space at North Street because of lack of demand for retail units in the Town Centre particularly large units. This is due to falling demand for retail space in Guildford and town centres throughout the county evidenced by independent research and the reality of empty shops in many high streets (including Guildford) and the accelerating competition from internet shopping.

The recent Carter Jonas Study Retail Study 2017 update predicts total demand for Guildford Town Centre by 2020 at only 3,313 sq m and only 34,811 sq m by 2036. We have now been waiting some 15 years + for demand to catch up to enable development of North Street where the old consent for some 40,000 sq m of retail had to be renewed because it was getting out of date. Are we now going to have to wait till 2036 only another 19 years for demand to get to the point to enable development of this much prized site which developers have not exactly been falling over themselves to develop. That is also assuming that all retail demand in the Town Centre is wanting just this site.

However optimistically and quite illogically they protest that “there still remains significant capacity to support new comparison goods floorspace over the plan period”. It’s a bit like saying in town x we have currently 100,000 m of shopping and the UK retail forecast done by Experian shows that we can predict a growth of 10% therefore this means we must have an additional 10,000 sq m in town x. This is unscientific guess work.

In table 2 Appendix 6 of their report we learn that there is a potential for turnover to reach £856.3m in the town centre by 2020 however actual committed floorspace take up accounts for only £1.3m of this. This is 0.15%. It is hardly surprising that there are no details of take up or real demand evidence given anywhere in the report.

The Carter Jonas report is based on broad brush retail capacity forecasting derived from work by Experian which is very far from site or location specific and as a retail supply and demand assessment in my view is totally unreliable. The source is not even Guildford specific or even Surrey specific. The authors of the report do not disagree with my cynicism with capacity forecasting since they state up front that “It should be noted at the outset that capacity forecasts carried out over a long period of time are inherently less certain and should be treated with caution” and repeated again “at the outset we advise that all capacity forecasts beyond a five year period should be treated with caution. This is because long term trends in the economy, consumer demand and retail property market could have a significant impact on the potential capacity and need for new retail floorspace. For example, as discussed previously, a higher growth in non-store retail sales (i.e. Internet sales) than forecast by Experian would reduce the capacity for new retail floorspace over time.”

The Carter Jonas report is a vague whitewash report for a pre-conceived and outdated concept of increased retail development in the town centre. “For comparison goods, we have assumed the same estimations for convenience goods expenditure ‘inflow’ (10%) for Guildford Town Centre, again based on the centre’s role as a popular shopping and visitor destination.” Coming to the vague conclusion that Guildford is popular is far from reliable property market research.

The closest thing I can find to evidence of actual demand in this report is to read “In addition to focusing their attention on larger, dominant centres, many of the multiples and traditional high street retailers are changing their store formats and locational requirements. For example, key anchor retailers such as Boots, Next, Mothercare, TK Maxx, John Lewis and Marks & Spencer are actively seeking larger format units to showcase their full product range and to provide an exciting shopper environment backed by the latest (digital) technology.” But this statement applies to any of 100 centres in the UK. We are concerned as to whether the authors of this retail study have actually visited Guildford or know where it is?

In their 2014/2015 reports Carter Jonas provided a fairly inaccurate picture of retail demand (originally Appendix 6) with the inclusion of retailers who had either gone bust or actually specified demand requirements in centres other than Guildford. This I note has now been deleted presumably because of its inaccuracies which were dealt with in my 2016 objection and has not been updated. We are now left with no demand assessment from either small, medium sized or
large retailers. This does not support the view that Guildford is a vibrant retail destination requiring expansion with a large retail development in North Street.

The reality is that the town centre has enough retail floor space. If more is introduced it will result in the closure of existing shops particularly in locations which are less than 50% of peak Zone A or 100% positions. What Guildford needs is a new focus on specialty high quality comparison shopping supported by a revival of Guildford’s attractive heritage core and a new major visitor attraction supported by restaurants. Guildford needs to become the quality shopping destination for Surrey.

The existing site in North Street should be replaced with a well-designed ground floor high quality specialty retail mall and frontage of no more than 40 shops extending to 10,000 sq m with the rear and upper floors providing an additional 600 homes. The proportion of the above proposed smaller scheme at North Street will be complementary to and not antagonistic to the Upper High Street, Tunsge, the Debenhams site and the 100% Zone A positions of the Lower High Street. If the existing policy under E7 is adopted the North Street site will remain empty for another 10 years.

I also object to the continued failure of this policy to provide much needed substantial residential development in the Town Centre which is still only a modest target of 1,300 homes. Only approximately 10% of the total planned for the Borough. There is still a blind overconcentration on retail expansion which fails to take account of market forces and a complete failure to grasp the reality that a residential expansion is required to stimulate retail/leisure demand in the Town Centre which is markedly losing out to nearby centres such as Woking which has a very different approach. See the Town Centre Opportunity in next section.

I object to the deletion of the vision statement “Guildford town centre has a unique setting and historical character, and is at the centre of one of the most prosperous counties in England. We will protect and build on these assets and insist that all new development will be of the highest design and environmental standards. We will be proactive in building a great town centre which connects to the amenity of the riverside. We will invest in creating high quality public realm. We will put people above traffic and we will promote new high quality retail and business development. To achieve this we will develop innovative funding and delivery bodies. As we embark together towards this exciting future we pledge that we will continue and extend an active dialogue with our residents and other stakeholders.” Guildford Town Centre needs a decent vision. Without a vision the Town Centre is flying blind and it demonstrates the failure of the potential for imaginative Town development in this latest draft plan.

I support the deletion of paragraph 4.4.86 since many of the sites along the River Wey are capable of full development.

I object to the deletion of the Allies and Morrison Masterplan as a source document for the plan since although it failed to fully exploit the development potential of the Town Centre it did include many good ideas including more extensive brownfield development extending to 2551 homes including Woodbridge Meadows as a residential development site.

I do not consider that the modest target of 1,300 homes in the town centre takes account of the need and demand for housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town which will in itself help to sustain the retail core by increased economic impact. What the town centre needs in terms of urban regeneration is much more residential development. As can be seen from the previous section, retail will not work!

The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015 which was originally adopted by GBC. The reality is that the Town Centre and other areas of brownfield in the borough has the capacity for at least 5,000/ 7,500 homes.

The additional target capacity of 5,000 could easily be provided within the following urban sites which have the capacity for 7,500 homes:

- 2,500 homes detailed in Masterplan 2015 including Woodbridge Meadows which can itself be increased substantially
- 500 homes at North Street
- 1000 homes on current GBC car parks (25 acres) and at the station
1000 homes saved in the urban area if 100% of students are accommodated on Surrey University campus (17 ha of car parks)
1000 homes at Slyfield on the 40 ha regeneration site
1000 windfall infill (50 per annum)
500 homes on brownfield sites in villages on sites of max 1ha which do not impact Green Belt

We need a new Local Plan for our borough in order to provide a development strategy within which we can accommodate our local housing, economic and environmental needs. But first we must make 100% use of our urban brownfield in the town before we consider building in the Green Belt or countryside.

Paragraph 80 of the NPPF clearly states that Green Belt serves a key purpose, “to assist in urban regeneration, by encouraging the recycling of derelict land and other urban land”. In order to comply with central planning policy we need a brownfield strategy that states clearly. “We are committed to a brownfield first initiative whereby all applications on previously developed land are given fast track priority and every facility to promote development for residential purposes and employment purposes in order to satisfy the needs of local people. In parallel a zero CIL incentive should be given for all residential development on brownfield land.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/18558  **Respondent:** 9079393 / Wisley Property Investments Ltd.  **Agent:** Savills (Charles Collins)

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

**Do you consider this section of the document: complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Policy E7: Guildford Town Centre**

**Support (Sound)**

WPI largely supports the wording of Policy E7 and fully endorses GBCâ€™s approach to enhancing the Town Centre. The regeneration of Guildford Town Centre will re-affirm its important regional role and help to secure the long term economic, environmental and cultural viability of the whole town centre. In addition, the redevelopment of Brownfield sites within the Town Centre will help GBC and other landowners to deliver new homes and offices in sustainable locations, ensuring that Guildford continues to remain an attractive place to live and work.

The suggested delivery of 242 dwellings within the first five years of the Local Plan (post-adoption) is noted but challenging. Town Centre development is inherently complex, notably given the densities and scope for additional mixed uses/land assembly (see Table 3.2, which demonstrates the bulk of development is coming forward beyond the five year period). By way of example, the refusal of a planning application for a mixed use redevelopment at Guildford Railway Station (reference 14/P/02168) comprising 478 new dwellings on 29 June 2016 is illustrative of the difficulties associated with town centre regeneration projects.

In addition, development height will always be governed by Guildford’s undulating topography and historic considerations, thus a longer time horizon may be required. Even should this level of growth be achieved then this would represent only 20% of planned town centre growth.

Given the complexities associated with Town Centre Development, there is a need for a flexible suite of development allocations, including the significant contribution large scale Brownfield/ Greenfield sites may bring. The Guildford Annual Monitoring Report 2014/15 (October 2015) shows that there is currently 2.4 years’ housing land supply within the Borough when calculated against the OAN figure of 693 dpa (West Surrey SHMA, September 2015). This figure has
been confirmed at a recent Appeal in Ash in which 56 dwellings were allowed by the Inspector (APP/Y3615/W/3135326).

The Wisley new settlement can deliver a significant number of dwellings within the first five years of the plan period and it is actively programmed to deliver new homes ahead of other strategic sites in the GBLP.

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)

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Comment ID: pslp171/2754  Respondent: 9079393 / Wisley Property Investments Ltd.  Agent: Savills (Jim Beavan)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy/Section / page / para | Original Changes requested (July 2016 Representation) | Understanding of changes shown in the Focused Amendments (June 2017) | WPI Comments (Updated Representation)
--- | --- | --- | ---
Policy E7: Guildford Town Centre Page 85 | WPI supports the draft policy. (Page 94) The vision has been removed from the supporting text to policy E7. Proposals for Guildford Town Centre are to be provided by 2034 (previously 2033) and the gross floor space expected at North Street Regeneration Site has been reduced from 45,000sqm to 41,000sqm. The number of new homes expected to be provided in Guildford Town Centre has increased from 1,172 to 1,300. Last 4 bullets from part (a) of policy E7 have been removed (relating to varied uses during the evening; active riverside uses; effective cycle and pedestrian routes; new public squares). | Changes are noted. Maintain support and note the increase in planned town centre housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7057  Respondent: 9094753 / D Jones  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4487   Respondent: 9298465 / Peter Grover   Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY E7

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

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There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.
The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8087  Respondent: 9298689 / Rod Wild  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy E7 - Guildford Town Centre

OBJECT. Guildford is in danger of throttling itself. It is not suited to be a 'growth hub'. It does not need more retail. The emphasis should be more residential use and preserving its historic appeal and character.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14955  Respondent: 9327009 / sp2 Consulting Limited (Stephen Parker)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT. There should be much more residential use of the town centre. There is limited need for further retail, which will disadvantage existing retailers as well as using valuable land inefficiently. Existing niche retailers should be supported, but this does not mean further retail expansion, which could be counterproductive. There is an urgent need for a brownfield register and to focus on brownfield redevelopment before considering development outside the existing urban area. CIL strategy must promote brownfield redevelopment. Guildford should strive for high quality definition making it a great centre for people to live in and visit. It would be a great mistake if Guildford were to opt for large impersonal department stores and dull high street chain stores at the expense of exploiting its uniqueness and character, which would afford greater benefits.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10648  Respondent: 9335041 / David Reeve  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E7
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy E7: Guildford Town Centre

The first half of this policy sounds like advertising copy, and does not belong in a planning policy.

The key things that will govern the success or otherwise of this policy are:

- Controlling (and reversing) the growth traffic in the town centre, and planning for more pedestrianisation.
- Recognising that the traditional model of retail has undergone great change in the recent past, and that it will continue to do so.
- Making people feel safe in the evenings. While the growth of the night time economy has certainly been popular amongst the young (and those businesses that serve them), there are growing numbers of people who feel less secure in Guildford at night that they did twenty five years ago.
- Identifying and building upon the key factors about Guildford that act as a draw, rather than trying to compete head-to-head with other established retail centres that trade on a “volume offering”.

It is far from clear that this policy has struck the right balance.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10556  Respondent: 10299041 / F McHugh  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)
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I OBJECT. The policy “vision” refers to protecting the Guildford’s “unique setting” (including, surely, its surrounding Green Belt and countryside views) but this is not carried over into the formal policy wording in the blue box. It is therefore a worthless commitment.

There should be much more residential use of the town centre where most people, especially the young and less well-off, want to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose a visionary regeneration plan for the River Wey/Walnut Tree Close area, where there is arguably enough brownfield land for 4,000 new homes, meeting near all the borough’s housing need over the plan period without harming the countryside. There is an urgent need for a brownfield register and to focus on brownfield redevelopment before considering development outside the existing urban area. CIL strategy must promote brownfield redevelopment.

Strangely, the policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

This policy also fails to provide guidance on design requirements, as required by the NPPF.[1]

Instead, it is far too concerned with shopping. Town-centre shopping is in decline internationally as consumers move irreversibly online. There is no need to expand physical retail capacity or warehousing floorspace, which will only kill off existing shops while using up valuable housing land. The delays to the redevelopment of North Street are symptomatic of shifting consumer patterns. Guildford is a large town without a single butcher or fishmonger, showing that the Council need to use the fiscal and other mechanisms at its disposal to support niche retailers. To opt for large, impersonal department stores and dull high-street chain stores at the expense of Guildford’s unique character would be an historic blunder. For this type of shopping, most residents can go to Woking or Kingston, whose ugly town centres should serve as a dire warning to Guildford planners.

[1] NPPF 59: “Local planning authorities should consider… the overall scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally.”

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:** PSLPP16/13612  **Respondent:** 10773441 / Barry Marshall  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

**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:** PSLPP16/11560  **Respondent:** 10774145 / P Jordan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E7
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Attached documents:

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Comment ID: PSLPP16/1783  Respondent: 10776225 / Roger Main  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy E7 – Guildford Town Centre

I OBJECT. The policy as stated is full of grand-sounding aspirations and buzz-words. Retail is not what it once was: the internet has changed everything, particularly the shopping experience. Woking and Kingston have changed – to produce conglomerates of high-street chains. Why does Guildford want to be the same? Surely it is better to encourage and develop a different type of town, not just a belated copy of the neighbours. There is an opportunity to develop with small speciality or boutique shops – at reasonable business rates (as set by the council) – with residential accommodation above (as is being promoted by the plan in Policy E8 (District Centres) to add to the liveliness of the centre). Look at parts of Brighton or Tunbridge Wells for inspiration, not Kingston and Woking.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPP16/13700  **Respondent:** 10782625 / Heather Alexander  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY E7 (TOWN CENTRE):

- No statement in policy wording of value of Guildford’s rural setting and views.
- No consideration of Town Centre Master Plan, GVG proposals or station redevelopment plans.
- Proportion of new housing in town far too small. Development pushed into countryside, ruining the latter and harming urban regeneration.
- No brownfield register.
- Too much big retail, despite online shopping revolution and decline of traditional high streets internationally. Futile to try to turn Guildford into Woking or Kingston.
- No measures to support small, niche retailers in town, e.g. through business rates.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/15336  **Respondent:** 10782689 / Murray Dudgeon  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

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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:** PSLPP16/845  **Respondent:** 10798049 / Steve & Maureen Knight  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

Support in principle although there must be more affordable/social housing, probably with increased density

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/338  **Respondent:** 10799169 / Neal Basson  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**POLICY E7 Guildford Town Centre**

OBJECT. There should be much more residential use of the town centre. There is limited need for further retail, which will disadvantage existing retailers as well as using valuable land inefficiently. Existing niche retailers should be supported, but this does not mean further retail expansion which could be counterproductive. There is an urgent need for a brownfield register and to focus on brownfield redevelopment before considering development outside the existing urban area. CIL strategy must promote brownfield redevelopment. Guildford should strive for high quality definition making it a great centre for people to live in and visit. It would be a great mistake if Guildford were to opt for large impersonal department stores and dull high street chain stores at the expense of exploiting its uniqueness and character which would afford greater benefits.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

The government committed to legislating for a ‘brownfield register’ of ‘land suitable for housing in the Queen’s Speech 2015 and the 73 councils piloting the brownfield register were announced in March, 2016. Section 151 of the Act permits regulations requiring LPAs to keep a register of particular kinds of land, of which the brownfield register will be one. There is no reference to a brownfield policy within the policy for Guildford Town Centre, which is a major flaw.

Retail

Policy E7 is ill-informed. The evidence base fails to assess the capacity of the existing town centre to accommodate appropriate new development objectively. Paragraph 161 of the NPPF requires the LPA to assess the real quantitative and qualitative needs for economic activity including retail and leisure development, and we consider that this requirement has not been met.

Policy E7 is unlikely to benefit the health of the town centre in the future. There is no reliable evidence provided that the retail core of the Town Centre can support expansion of 45,000 sq m of additional retail space at North Street. There is a lack of demand for retail units in the Town Centre particularly large units.

There is falling demand for retail space in Guildford and town centres throughout the country (as evidenced by independent research and the reality of empty shops in many high streets (including Guildford) and the accelerating competition from internet shopping – see CEBR studies).
The North Street scheme has repeatedly failed in various redevelopment proposals over the last ten years. This is evidence of a lack of demand, such that the original planning permission for a large retail scheme became time expired. A number of major developers have studied the proposals in detail and then withdrawn from negotiations because the proposals are not economically viable.

The reality is that the town centre has enough retail floor space. If more is introduced it will result in the closure of existing shops particularly in locations which are less than 50% of peak Zone A or 100% positions.

What Guildford needs is a new focus on speciality high quality comparison shopping supported by a revival of Guildford’s attractive heritage core and the historic visitor attractions supported by restaurants.

The existing site in North Street should be replaced with a well-designed ground floor high quality speciality retail mall and frontage of no more than 40 shops extending to 7,000 sq m with the rear and upper floors providing an additional 500 to 600 homes. The proportion of the above proposed smaller scheme at North Street will be complementary to and not antagonistic to the Upper High Street, Tunsgate, the Debenhams site and the 100% Zone A positions of the Lower High Street. If the existing policy under E7 is adopted the North Street site will remain empty for another 10 years.

The findings of the Guildford Retail and Leisure Study 25 September 2015 are very pessimistic about retail trends. Carter Jonas’s recent study reports a bad time for retail. GBC’s own evidence base demonstrates that there is limited demand for additional retails space. The bullet points below are direct quotes from the report:

- Para 3.3 Retail Trends “Town centres, once the principle focus for retail and leisure are now increasingly under threat”
- Para 3.4 Retail Expenditure “disposable income and retailers’ margins are being squeezed further”
- Para 3.5 “there has been limited growth in retail (convenience and comparison goods) expenditure per head since 2008”
- Para 3.6 “the retail sector remains fragile and analysts forecast that some operators and centres will continue to struggle over the short to medium term”
- Para 3.8 “completed new shopping centre floor space in the UK is currently at its lowest level since the 1990s”
- Para 3.11 Internet Shopping “New forms of retailing have also emerged in recent years and are becoming established as significant alternatives to more traditional ‘bricks and mortar’ shopping facilities. Over the last 5 years, online sales have increased by 222%”

Appendix 6 of the Retail Study indicates inaccurate demand data

- Para 5.29 “The latest CoStar Report recorded 64 requirements for Guildford from January 2013 to August 2014; representing a total maximum floor space requirement of 62,208m2 gross (see Appendix 6).”
- This looks in the main unpersuasive with brands such as Joules Clothing; Fossil; Comptoir des Cotonniers; Moschulu; Rituals; Princesse tam.tam; Cycle Surgery; Majestic Wine; Game Stores Group Ltd; Iceland. But if we look closely at Appendix 6 it is an amalgam of old unchecked national high street requirements some of which do not even include Guildford as a destination and most is hardly high quality comparison retail. There are also no “big” requirements in terms of space. Where are the big stores?
- GH Pressley & Sons – Watches and Silver- Requirement “They are seeking a flagship diamond store in central London. Target locations include Mayfair, St James, Kensington and Knightsbridge. Brands will include Hans D Krieger and Marco Bicego.” This does not sound like Guildford
- Oxygen Red Ltd – Ladieswear- Requirement “Oxygen Red is looking to acquire temporary stores in Shopping Centre locations within the M25” Guildford is well outside the M25
- Game Stores Group Ltd have apparently a requirement for a store in Guildford dated 2012 but the company entered administration on 26 March 2012, and 277 of Game's 609 UK stores were closed immediately, resulting in 2,104 job losses. Are they really looking?
- The data relating to retail demand does not appear reliable. The 62,800 sq m does not translate to real demand for an expansion of 500,000 sq ft. If proper due diligence was applied perhaps 10% of this Carter Jonas requirement would survive
Brownfield redevelopment

We must make full use of our urban brownfield before we consider building in the Green Belt or countryside. Paragraph 17 of the NPPF states that to “encourage the effective use of land by reusing land that has been previously developed (brownfield land)” is a core planning principle. Paragraph 80 of the NPPF clearly states that Green Belt serves a key purpose, “to assist in urban regeneration, by encouraging the recycling of derelict land and other urban land”. In order to comply with central planning policy we need a brownfield strategy.

In response to the detailed objections received in the Regulation 18 process of the 2014 Local Plan and also in accordance with government policy a Guildford brownfield land register should be urgently compiled showing address, ownership, occupier, current use and detailed planning brief.

- GBC needs to accelerate residential redevelopment at Woodbridge Meadows, Walnut Tree Close and the Station within the next 1 to 5 years
- GBC needs to examine the residential development opportunity of the 25.7 acres of car parks in GBC ownership
- A brownfield-first policy should underline all planning decisions and the default for non-brownfield land should be rejection
- Failure to promote brownfield-first is unsustainable and is contrary both to the policies of the Metropolitan Green Belt (still in force) and NPPF paragraph 80 and 84.

Our recommendation is for a new Brownfield Policy for the town centre:

“We are committed to a brownfield-first initiative. All applications on previously developed land within the urban settlement area will be given fast-track priority. Development of urban brownfield land will be prioritised for residential and employment purposes to satisfy the needs of local people.

In parallel a zero-CIL incentive should be given for all residential development on urban brownfield land in order to meet the NPPF requirement for urban regeneration. Brownfield sites in the urban area should be identified as soon as possible. The register should be public, with full details of ownership. All brownfield sites owned by Guildford Borough Council, Surrey County Council or other government entities should be considered as available development land within the first 5 years of the plan.”

Residential

We do not believe that the target of 1,172 homes in the town centre takes account of the need and demand for urban housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town. This will help to sustain the retail core. The Town Centre policy needs to maximise the potential for residential development on brownfield. It must include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015 which has recently been adopted by GBC. We consider that the Town Centre has the capacity for the higher of at least 50% of the total or at least 5,000 homes. At present, the plan is to impose 70% of new residential development on greenfield and Green Belt land.

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OBJECT. There should be much more residential use of the town centre. There is limited need for further retail, which will disadvantage existing retailers as well as using valuable land inefficiently. Existing niche retailers should be supported, but this does not mean further retail expansion which could be counterproductive. There is an urgent need for a brownfield register and to focus on brownfield redevelopment before considering development outside the existing urban area. CIL strategy must promote brownfield redevelopment. Guildford should strive for high quality definition making it a great centre for people to live in and visit. It would be a great mistake if Guildford were to opt for large impersonal department stores and dull high street chain stores at the expense of exploiting its uniqueness and character which would afford greater benefits.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11060  Respondent: 10809377 / Bernice Williams  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy E7 Guildford Town Centre

The policy "vision" describes protecting the Guildford's unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council's own Town Centre Master Plan, the Guildford Vision Group's proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford's character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12249  Respondent: 10816993 / Jane Roberts  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7
I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or no force. These principles should be included in the formal policy.

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The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6642  Respondent: 10829121 / Julie Brown  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to POLICY E7 Guildford Town Centre

• No statement in policy wording of value of Guildford’s rural setting and views.
• No consideration of Town Centre Master Plan, GVG proposals or station redevelopment plans.
• Proportion of new housing in town far too small. Development pushed into countryside, ruining the latter and harming urban regeneration.
• No brownfield register.
• Too much big retail, despite online shopping revolution and decline of traditional high streets internationally. Futile to try to turn Guildford into Woking or Kingston.

• No measures to support small, niche retailers in town, e.g. through business rates.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to POLICY E7 "Guildford Town Centre"

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- No measures to support small, niche retailers in town, e.g. through business rates.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

1.1 I object to Policy E7 “Guildford Town Centre” on the grounds that;

1.2 Policy E7 is ill-informed and there is insufficient evidential support to objectively assess the capacity of the existing town centre to accommodate appropriate new development and therefore fails the requirements of Section 161 of the NPPF to assess the real quantitative and qualitative floor space needs.

1.3 Policy E7 is an aspirational voice from the past and is unlikely to benefit the health of the town centre in the future. There is no reliable evidence provided that the retail core of the Town Centre needs or can be expanded by 45,000 sq m of retail space at North Street because of lack of demand for retail units in the Town Centre particularly large units. This is due to falling demand for retail space in Guildford and town centres throughout the country evidenced by independent research and the reality of empty shops in many high streets (including Guildford) and the accelerating competition from internet shopping.

1.4 The failure of the North Street scheme to be redeveloped over the last ten years is a testament to lack of demand which has been so poor that the original planning permission for a large retail scheme became time expired.

1.5 The reality is that the town centre has enough retail floor space. If more is introduced it will result in the closure of existing shops particularly in locations which are less than 50% of peak Zone A or 100% positions. What Guildford needs is a new focus on speciality high quality comparison shopping supported by a revival of Guildford’s attractive heritage core and a new major visitor attraction supported by restaurants. Guildford needs to become the quality shopping destination for Surrey.

1.6 The existing site in North Street should be replaced with a well-designed ground floor high quality speciality retail mall and frontage of no more than 40 shops extending to 7,000 sq m with the rear and upper floors providing an additional 500 to 600 homes. The proportion of the above proposed smaller scheme at North Street will be complementary to and not antagonistic to the Upper High Street, Tunsgate, the Debenhams site and the 100% Zone A positions of the Lower High Street. If the existing policy under E7 is adopted the North Street site will remain empty for another 10 year
1.7 The findings of the Guildford Retail and Leisure Study 25 September 2015 are very pessimistic about retail trends. Carter Jonas’s recent retail study reports a fairly bad time for retail, the bullets below are direct quotes from the report:

1. Para 3.3 Retail Trends “Town centres, once the principle focus for retail and leisure are now increasingly under threat”

2. Para 3.4 Retail Expenditure “disposable income and retailers’ margins are being squeezed further”

3. Para 3.5 “there has been limited growth in retail (convenience and comparison goods) expenditure per head since 2008”

4. Para 3.6 “the retail sector remains fragile and analysts forecast that some operators and centres will continue to struggle over the short to medium term”

5. Para 3.8 “completed new shopping centre floor space in the UK is currently at its lowest level since the 1990s”

6. Para 3.11 Internet Shopping “New forms of retailing have also emerged in recent years and are becoming established as significant alternatives to more traditional ‘bricks and mortar’ shopping facilities. Over the last 5 years, online sales have increased by 222%”

1.8 Despite the findings about retail we are told “evidence suggests that high quality schemes will continue to prosper.” What evidence?

1.9 Para 3.33 “the latest 2013-14 Javelin VenueScore17 ranks Guildford Town Centre within the UK’s top 50 shopping locations at 33. By contrast, Kingston-Upon-Thames is ranked 17th. Since 2007, Guildford Town Centre has fallen 20 places in the Venue Score ranking”

1.10 Para 3.40 “The growth of online shopping is also impacting on the vitality and viability of many of Britain’s centres and high streets. This is placing pressures on rental growth and market demand in many centres, particularly secondary centres outside the ‘top 100’ shopping locations. This has been further compounded by rising vacancy levels and the loss of key retailers. As a result, the share of non-food retail sales conducted through town centre shops has declined, from 64% in 2002 to just over 40% by 2013. In our opinion, a far more uncertain future awaits the next “wave” of new retail investment and development. The evidence suggests that high quality schemes in the strongest prime shopping locations will continue to prosper.” Is this not an aspirational assumption?

1.11 Para 3.41 “Notwithstanding the threat of online shopping, industry experts still predict that the demand from major retailers for new space will continue as it remains the primary mechanism for retailers to ‘reach’ their customers and grow their businesses.” Who are these industry experts? Is this not an outdated concept and merely an aspiration of the British Council of Shopping Centres (BCSC)?

1.12 Appendix 6 of the Retail Study indicates potentially inaccurate demand data

1.13 Para 5.29 “The latest CoStar Report recorded 64 requirements for Guildford from January 2013 to August 2014; representing a total maximum floor space requirement of 62,208m2 gross (see Appendix 6).”

1.14 The Appendix 6 list of retailer demand looks impressive with brands such as Joules Clothing; Fossil; Comptoir des Cotonniers; Moshulu; Rituals; Princesse tam.tam; Cycle Surgery; Majestic Wine; Game Stores Group Ltd; Iceland. However, if we look closely at Appendix 6 it is an amalgam of old unchecked national high street requirements some of which do not even include Guildford as a destination and the majority are hardly high quality comparison retail. There are also no “big” requirements in terms of space. Where are the big stores?

1.15 GH Pressley & Sons – Watches and Silver- Requirement “They are seeking a flagship diamond store in central London. Target locations include Mayfair, St James, Kensington and Knightsbridge. Brands will include Hans D Krieger and Marco Bicego.” This does not sound like Guildford.
1.16 Oxygen Red Ltd – Ladieswear Requirement “Oxygen Red is looking to acquire temporary stores in Shopping Centre locations within the M25” Guildford is well outside the M25.

1.17 The data relating to retail demand does not appear reliable. The 62,800 sq m does not translate to real demand for an expansion of 500,000 sq ft. If proper due diligence was applied perhaps 30% of this alleged Carter Jonas requirement would survive proper scrutiny.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** pslp171/1112  **Respondent:** 10846625 / Frank Drennan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy E7

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 E7 Guildford Town Centre. There is insufficient evidential support to objectively assess the capacity of the existing town centre to accommodate appropriate new development and therefore fails the requirements of Section 161 of the NPPF to assess the real quantitative and qualitative floor space needs.

I object to the deletion of the Allies and Morrison Masterplan as a source document for the plan since although it failed to fully exploit the development potential of the Town Centre it did include many good ideas including more extensive brownfield development extending to 2551 homes including Woodbridge Meadows as a residential development site. The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015 which was originally adopted by GBC. The reality is that the Town Centre and other areas of brownfield in the borough has the capacity for at least 5,000/ 7,500 homes. The additional target capacity of 5,000 could easily be provided within the following urban sites which have the capacity for 7,500 homes:

- 2,500 homes detailed in Masterplan 2015 including Woodbridge Meadows which can itself be increased substantially
- 500 homes at North Street
- 1000 homes on current GBC car parks (25 acres) and at the station
- 1000 homes saved in the urban area if 100% of students are accommodated on Surrey University campus (17 ha of car parks)
- 1000 homes at Slyfield on the 40 ha regeneration site
- 1000 windfall infill (50 per annum)
- 500 homes on brownfield sites in villages on sites of max 1ha which do not impact Green Belt

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** pslp171/2141  **Respondent:** 10847521 / Andrew Procter  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy E7

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 in Policy E7 Guildford Town Centre
1.2 I am of the opinion that policy E7 is still very ill-informed and there is insufficient evidential support to objectively assess the capacity of the existing town centre to accommodate appropriate new development and therefore fails the requirements of Section 161 of the NPPF to assess the real quantitative and qualitative floor space needs.

1.3 Policy E7 is still an aspirational voice from the past and is unlikely to benefit the health of the town centre in the future. There is no reliable evidence provided that the retail core of the Town Centre needs or can be expanded by 41,000 sq m of retail space at North Street because of lack of demand for retail units in the Town Centre particularly large units. This is due to falling demand for retail space in Guildford and town centres throughout the country evidenced by independent research and the reality of empty shops in many high streets (including Guildford) and the accelerating competition from internet shopping.

1.4 The recent Carter Jonas Study Retail Study 2017 update predicts total demand for Guildford Town Centre by 2020 at only 3,313 sq m and only 34,811 sq m by 2036. We have now been waiting some 15 years + for demand to catch up to enable development of North Street where the old consent for some 40,000 sq m of retail had to be renewed because it was getting out of date. Are we now going to have to wait till 2036 only another 19 years for demand to get to the point to enable development of this much prized site which developers have not exactly been falling over themselves to develop. That is also assuming that all retail demand in the Town Centre is wanting just this site.

1.5 However optimistically and quite illogically they protest that “there still remains significant capacity to support new comparison goods floorspace over the plan period”. It’s a bit like saying in town x we have currently 100,000 m of shopping and the UK retail forecast done by Experian shows that we can predict a growth of 10% therefore this means we must have an additional 10,000 sq m in town x. This is unsound guesswork.

1.6 In table 2 Appendix 6 of their report we learn that there is a potential for turnover to reach £856.3m in the town centre by 2020 however actual committed floorspace take up accounts for only £1.3m of this. This is 0.15%. It is hardly surprising that there are no details of take up or real demand evidence given anywhere in the report.

1.7 The Carter Jonas report is based on broad brush retail capacity forecasting derived from work by Experian which is very far from site or location specific and as a retail supply and demand assessment in my view is totally unreliable. The source is not even Guildford specific or even Surrey specific. The authors of the report do not disagree with my cynicism with capacity forecasting since they state up front that “It should be noted at the outset that capacity forecasts carried out over a long period of time are inherently less certain and should be treated with caution” and repeated again “at the outset we advise that all capacity forecasts beyond a five year period should be treated with caution. This is because long term trends in the economy, consumer demand and retail property market could have a significant impact on the potential capacity and need for new retail floorspace. For example, as discussed previously, a higher growth in non-store retail sales (i.e. Internet sales) than forecast by Experian would reduce the capacity for new retail floorspace over time.”

1.8 The Carter Jonas report is a vague whitewash report for a pre-conceived and outdated concept of increased retail development in the town centre. “For comparison goods, we have assumed the same estimations for convenience goods expenditure ‘inflow’ (10%) for Guildford Town Centre, again based on the centre’s role as a popular shopping and visitor destination.” Coming to the vague conclusion that Guildford is popular is far from reliable property market research!

1.9 The closest thing I can find to evidence of actual demand in this report is to read “In addition to focusing their attention on larger, dominant centres, many of the multiples and traditional high street retailers are changing their store formats and locational requirements. For example, key anchor retailers such as Boots, Next, Mothercare, TK Maxx, John Lewis and Marks & Spencer are actively seeking larger format units to showcase their full product range and to provide an exciting shopper environment backed by the latest (digital) technology.” But I then realisation this statement applies to any of 100 centres in the UK. I am concerned as to whether the authors of this retail study have actually visited Guildford or know where it is?!1.10 In their 2014/2015 reports Carter Jonas provided a fairly inaccurate picture of retail demand (originally Appendix 6) with the inclusion of retailers who had either gone bust or actually specified demand requirements in centres other than Guildford. This I note has now been deleted presumably because of its inaccuracies which were dealt with in my 2016 objection and has not been updated. We are now left with no demand assessment from either small, medium sized or large retailers. This does not support the view that Guildford is a vibrant retail destination requiring expansion with a large retail development in North Street.
1.11 The reality is that the town centre has enough retail floor space. If more is introduced it will result in the closure of existing shops particularly in locations which are less than 50% of peak Zone A or 100% positions. What Guildford needs is a new focus on specialty high quality comparison shopping supported by a revival of Guildford’s attractive heritage core and a new major visitor attraction supported by restaurants. Guildford needs to become the quality shopping destination for Surrey.

1.12 The existing site in North Street should be replaced with a well-designed ground floor high quality specialty retail mall and frontage of no more than 40 shops extending to 10,000 sq m with the rear and upper floors providing an additional 600 homes. The proportion of the above proposed smaller scheme at North Street will be complementary to and not antagonistic to the Upper High Street, Tunsgate, the Debenhams site and the 100% Zone A positions of the Lower High Street. If the existing policy under E7 is adopted the North Street site will remain empty for another 10 years.

1.13 I also object to the continued failure of this policy to provide much needed substantial residential development in the Town Centre which is still only a modest target of 1,300 homes. Only approximately 10% of the total planned for the Borough. There is still a blind over concentration on retail expansion which fails to take account of market forces and a complete failure to grasp the reality that a residential expansion is required to stimulate retail/leisure demand in the Town Centre which is markedly losing out to nearby centres such as Woking which has a very different approach. See the Town Centre Opportunity in next section.

1.14 I object to the deletion of the vision statement “Guildford town centre has a unique setting and historical character, and is at the centre of one of the most prosperous counties in England. We will protect and build on these assets and insist that all new development will be of the highest design and environmental standards. We will be proactive in building a great town centre which connects to the amenity of the riverside. We will invest in creating high quality public realm. We will put people above traffic and we will promote new high quality retail and business development. To achieve this we will develop innovative funding and delivery bodies. As we embark together towards this exciting future we pledge that we will continue and extend an active dialogue with our residents and other stakeholders.” Guildford Town Centre needs a decent vision. Without a vision the Town Centre is flying blind and it demonstrates the failure of the potential for imaginative Town development in this latest draft plan.

1.15 I support the deletion of paragraph 4.4.86 since many of the sites along the River Wey are capable of full development

1.16 I object to the deletion of the Allies and Morrison Masterplan as a source document for the plan since although it failed to fully exploit the development potential of the Town Centre it did include many good ideas including more extensive brownfield development extending to 2551 homes including Woodbridge Meadows as a residential development site.

1.17 I do not consider that the modest target of 1,300 homes in the town centre takes account of the need and demand for housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town which will in itself help to sustain the retail core by increased economic impact. What the town centre needs in terms of urban regeneration is much more residential development. As can be seen from the previous section, retail will not work!

1.18 The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015 which was originally adopted by GBC. The reality is that the Town Centre and other areas of brownfield in the borough has the capacity for at least 5,000/ 7,500 homes.

1.19 The additional target capacity of 5,000 could easily be provided within the following urban sites which have the capacity for 7,500 homes:

- 2,500 homes detailed in Masterplan 2015 including Woodbridge Meadows which can itself be increased substantially
- 500 homes at North Street
- 1000 homes on current GBC car parks (25 acres) and at the station
1.20 Yes, we need a new Local Plan for our borough in order to provide a development strategy within which we can accommodate our local housing, economic and environmental needs. **But first** we must make 100% use of our **urban brownfield** in the town before we consider building in the Green Belt or countryside.

1.21 Paragraph 80 of the NPPF clearly states that Green Belt serves a key purpose, “to assist in urban regeneration, by encouraging the recycling of derelict land and other urban land”. In order to comply with central planning policy we need a brownfield strategy that states clearly. “We are committed to a brownfield first initiative whereby all applications on previously developed land are given fast track priority and every facility to promote development for residential purposes and employment purposes in order to satisfy the needs of local people. In parallel a zero CIL incentive should be given for all residential development on brownfield land.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/7183  **Respondent:** 10854113 / Sarah Pickering  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

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**WE OBJECT** to Policy E7 Guildford Town Centre

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The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature, which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
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Policy E7: Guildford Town Centre

I OBJECT to this policy
There should be much more residential use of the town centre. There is a very limited need for further retail, which will disadvantage existing retailers and the unique High Street.

The town centre lacks essential shops such as butchers, grocers, bakers which need support.

A central bus station and shuttle must be provided and priority must be given to bus/rail interchange to enable sustainable transport.

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I object to Policy E7 Guildford Town Centre

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The failure of the North Street scheme to be redeveloped over the last ten years is a testament to lack of demand which has been so poor that the original planning permission for a large retail scheme became time expired.

The reality is that the town centre has enough retail floor space. If more is introduced it will result in the closure of existing shops particularly in locations which are less than 50% of peak Zone A or 100% positions. What Guildford needs is a new focus on speciality high quality comparison shopping supported by a revival of Guildford’s attractive heritage core and a new major visitor attraction supported by restaurants. Guildford needs to become the quality shopping destination for Surrey.

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Despite the findings about retail we are told “evidence suggests that high quality schemes will continue to prosper.” What evidence?

Para 3.33 “the latest 2013-14 Javelin VenueScore17 ranks Guildford Town Centre within the UK’s top 50 shopping locations at 33. By contrast, Kingston-Upon-Thames is ranked 17th. Since 2007, Guildford Town Centre has fallen 20 places in the Venue Score ranking”

Para 3.40 “The growth of online shopping is also impacting on the vitality and viability of many of Britain’s centres and high streets. This is placing pressures on rental growth and market demand in many centres, particularly secondary centres outside the ‘top 100’ shopping locations. This has been further compounded by rising vacancy levels and the loss of key retailers. As a result, the share of non-food retail sales conducted through town centre shops has declined, from 64% in 2002 to just over 40% by 2013. In our opinion, a far more uncertain future awaits the next “wave” of new retail investment and development. The evidence suggests that high quality schemes in the strongest prime shopping locations will continue to prosper.” Is this not an aspirational assumption?

Para 3.41 “Notwithstanding the threat of online shopping, industry experts still predict that the demand from major retailers for new space will continue as it remains the primary mechanism for retailers to ‘reach’ their customers and grow their businesses.” Who are these industry experts? Is this not an outdated concept and merely an aspiration of the British Council of Shopping Centres (BCSC)?

Appendix 6 of the Retail Study indicates potentially inaccurate demand data

Para 5.29 “The latest CoStar Report recorded 64 requirements for Guildford from January 2013 to August 2014; representing a total maximum floor space requirement of 62,208m2 gross (see Appendix 6).”

The Appendix 6 list of retailer demand looks impressive with brands such as Joules Clothing; Fossil; Comptoir des Cotonniers; Moshulu; Rituals; Princesse tam.tam; Cycle Surgery; Majestic Wine; Game Stores Group Ltd; Iceland. However, if we look closely at Appendix 6 it is an amalgam of old unchecked national high street requirements some of which do not even include Guildford as a destination and the majority are hardly high quality comparison retail. There are also no “big” requirements in terms of space. Where are the big stores?

GH Pressley & Sons – Watches and Silver- Requirement “They are seeking a flagship diamond store in central London. Target locations include Mayfair, St James, Kensington and Knightsbridge. Brands will include Hans D Krieger and Marco Bicego.” This does not sound like Guildford.

Oxygen Red Ltd – Ladieswear- Requirement “Oxygen Red is looking to acquire temporary stores in Shopping Centre locations within the M25” Guildford is well outside the M25.

The data relating to retail demand does not appear reliable. The 62,800 sq m does not translate to real demand for an expansion of 500,000 sq ft. If proper due diligence was applied perhaps 30% of this alleged Carter Jonas requirement would survive proper scrutiny.

THE TOWN CENTRE OPPORTUNITY

I do not consider that the target of 1,172 homes in the town centre takes account of the need and demand for housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town which will in itself help to sustain the retail core by increased economic impact. What the town centre needs in terms of urban regeneration is much more residential development. As can be seen from the previous section retail will not work!
The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015 which has recently been adopted by GBC. The reality is that the Town Centre and other areas of brownfield in the borough has the capacity for at least 5,000/7,500 homes.

The additional target capacity of 5,000 could easily be provided within the following urban sites which have the capacity for 7,500 homes:

- 2,500 homes detailed in Masterplan 2015 including Woodbridge Meadows which can itself be increased substantially
- 500 homes at North Street
- 1000 homes on current GBC car parks (25 acres) and at the station
- 1000 homes saved in the urban area if 100% of students are accommodated on Surrey University campus (17 ha of car parks)
- 1000 homes at Slyfield on the 40 ha regeneration site
- 1000 windfall infill (50 per annum)
- 500 homes on brownfield sites in villages on sites of max 1ha which do not impact Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
In table 2 Appendix 6 of their report we learn that there is a potential for turnover to reach £856.3m in the town centre by 2020 however actual committed floorspace take up accounts for only £1.3m of this. This is 0.15%. It is hardly surprising that there are no details of take up or real demand evidence given anywhere in the report.

1.7 The Carter Jonas report is based on broad brush retail capacity forecasting derived from work by Experian which is very far from site or location specific and as a retail supply and demand assessment in my view is totally unreliable. The source is not even Guildford specific or even Surrey specific. The authors of the report do not disagree with my cynicism with capacity forecasting since they state up front that “It should be noted at the outset that capacity forecasts carried out over a long period of time are inherently less certain and should be treated with caution” and repeated again “at the outset we advise that all capacity forecasts beyond a five year period should be treated with caution. This is because long term trends in the economy, consumer demand and retail property market could have a significant impact on the potential capacity and need for new retail floorspace. For example, as discussed previously, a higher growth in non-store retail sales (i.e. Internet sales) than forecast by Experian would reduce the capacity for new retail floorspace over time.”

1.8 The Carter Jonas report is a vague whitewash report for a pre-conceived and outdated concept of increased retail sales (i.e. Internet sales) than forecast by Experian would reduce the capacity for new retail floorspace over time. For example, discussed previously, a higher growth in non-store retail sales (i.e. Internet sales) than forecast by Experian would reduce the capacity for new retail floorspace over time. 

1.9 The closest thing I can find to evidence of actual demand in this report is to read “In addition to focusing their attention on larger, dominant centres, many of the multiples and traditional high street retailers are changing their store formats and locational requirements. For example, key anchor retailers such as Boots, Next, Mothercare, TK Maxx, John Lewis and Marks & Spencer are actively seeking larger format units to showcase their full product range and to provide an exciting shopper environment backed by the latest (digital) technology.” But I then realise this statement applies to any of 100 centres in the UK. I am concerned as to whether the authors of this retail study have actually visited Guildford or know where it is?

1.10 In their 2014/2015 reports Carter Jonas provided a fairly inaccurate picture of retail demand (originally Appendix 6) with the inclusion of retailers who had either gone bust or actually specified demand requirements in centres other than Guildford. This I note has now been deleted presumably because of its inaccuracies which were dealt with in my 2016 objection and has not been updated. We are now left with no demand assessment from either small, medium sized or large retailers. This does not support the view that Guildford is a vibrant retail destination requiring expansion with a large retail development in North Street.

1.11 The reality is that the town centre has enough retail floor space. If more is introduced it will result in the closure of existing shops particularly in locations which are less than 50% of peak Zone A or 100% positions. What Guildford needs is a new focus on specialty high quality comparison shopping supported by a revival of Guildford’s attractive heritage core and a new major visitor attraction supported by restaurants. Guildford needs to become the quality shopping destination for Surrey.

1.12 The existing site in North Street should be replaced with a well-designed ground floor high quality speciality retail mall and frontage of no more than 40 shops extending to 10,000 sq m with the rear and upper floors providing an additional 600 homes. The proportion of the above proposed smaller scheme at North Street will be complementary to and not antagonistic to the Upper High Street, Tunsgate, the Debenhams site and the 100% Zone A positions of the Lower High Street. If the existing policy under E7 is adopted the North Street site will remain empty for another 10 years.

1.13 I also object to the continued failure of this policy to provide much needed substantial residential development in the Town Centre which is still only a modest target of 1,300 homes. Only approximately 10% of the total planned for the Borough. There is still a blind over concentration on retail expansion which fails to take account of market forces and a complete failure to grasp the reality that a residential expansion is required to stimulate retail/leisure demand in the Town Centre which is markedly losing out to nearby centres such as Woking which has a very different approach. See the Town Centre Opportunity in next section.

1.14 I object to the deletion of the vision statement “Guildford town centre has a unique setting and historical character, and is at the centre of one of the most prosperous counties in England. We will protect and build on these assets and insist that all new development will be of the highest design and environmental standards. We will be proactive in
building a great town centre which connects to the amenity of the riverside. We will invest in creating high quality public realm. We will put people above traffic and we will promote new high quality retail and business development. To achieve this we will develop innovative funding and delivery bodies. As we embark together towards this exciting future we pledge that we will continue and extend an active dialogue with our residents and other stakeholders.

Guildford Town Centre needs a decent vision. Without a vision the Town Centre is flying blind and it demonstrates the failure of the potential for imaginative Town development in this latest draft plan.

1.15 I support the deletion of paragraph 4.4.86 since many of the sites along the River Wey are capable of full development

1.16 I object to the deletion of the Allies and Morrison Masterplan as a source document for the plan since although it failed to fully exploit the development potential of the Town Centre it did include many good ideas including more extensive brownfield development extending to 2551 homes including Woodbridge Meadows as a residential development site.

1.17 I do not consider that the modest target of 1,300 homes in the town centre takes account of the need and demand for housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town which will in itself help to sustain the retail core by increased economic impact. What the town centre needs in terms of urban regeneration is much more residential development. As can be seen from the previous section, retail will not work!

1.18 The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015 which was originally adopted by GBC. The reality is that the Town Centre and other areas of brownfield in the borough has the capacity for at least 5,000/7,500 homes.

1.19 The additional target capacity of 5,000 could easily be provided within the following urban sites which have the capacity for 7,500 homes:

- 2,500 homes detailed in Masterplan 2015 including Woodbridge Meadows which can itself be increased substantially
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- 500 homes on brownfield sites in villages on sites of max 1ha which do not impact Green Belt

1.20 Yes, we need a new Local Plan for our borough in order to provide a development strategy within which we can accommodate our local housing, economic and environmental needs. But first we must know how many we need to accommodate and make 100% use of our urban brownfield in the town before we consider building in the Green Belt or countryside.

1.21 Paragraph 80 of the NPPF clearly states that Green Belt serves a key purpose, “to assist in urban regeneration, by encouraging the recycling of derelict land and other urban land”. In order to comply with central planning policy we need a brownfield strategy that states clearly. “We are committed to a brownfield first initiative whereby all applications on previously developed land are given fast track priority and every facility to promote development for residential purposes and employment purposes in order to satisfy the needs of local people. In parallel a zero CIL incentive should be given for all residential development on brownfield land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15500  Respondent: 10894817 / Stephanie Woodford  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the expansion of commercial land in the urban area losing the potential for further housing. Policy E7: Guildford Town Centre

There is no reliable evidence provided that the retail core of the Town Centre can support expansion of 45,000 sq m of additional retail space at North Street.

Online retail is set to account for 21.5% of total retail sales by 2018 from 12.7% in 2013, the highest online retail share in the world according to the Centre for Retail Research. March 2016, online sales rose 12.3%, and it was the third consecutive month in which more than 20% of all non-food shopping took place online, (British Retail Consortium and accounting firm KPMG) With such a high retailers will need just 70 high street stores to create a national presence compared to 250 in the mid 2000’s. An expansion on such a scale is negligent when the Council claims to be in such desperate need for housing.

Retail is a declining industry and should not be invested in by the Borough at the expense of housing in the most sustainable urban location, near employment and transport hubs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7218  Respondent: 10915361 / Judy Young  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY E7 – Guildford Town Centre
I OBJECT to this policy. The retail landscape is irreversibly changing and Guildford town centre could lead the way in
being a town centre that thrives and regenerates through judiciously combined residential use of the town centre with shopping and leisure opportunities. Guildford could lead the way in brownfield redevelopment and become pioneers for resourceful and effective modern living.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14775  Respondent: 10920129 / Steven Marshall  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Guildford Town Centre OBJECT. The town centre is the logical place to locate new housing – work and leisure opportunities abound. That would make more sense than building yet more shops.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11326  Respondent: 10923297 / Matthew Burnham  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY E7 (TOWN CENTRE):

- No statement in policy wording of value of Guildford’s rural setting and views.
- No consideration of Town Centre Master Plan, GVG proposals or station redevelopment plans.
- Proportion of new housing in town far too small. Development pushed into countryside, ruining the latter and harming urban regeneration.
- No brownfield register.
- Too much big retail, despite online shopping revolution and decline of traditional high streets internationally. Futile to try to turn Guildford into Woking or Kingston.
- No measures to support small, niche retailers in town, e.g. through business rates.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9028  Respondent: 10928737 / Guy Pashley  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy E7 Guildford Town Centre
The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Instead, it is far too concerned with shopping. Town-centre shopping is in decline internationally as consumers move irreversibly online. There is no need to expand physical retail capacity or warehousing floorspace, which will only kill off existing shops while using up valuable housing land. The delays to the redevelopment of North Street is a flashing red light warning that consumer patterns are shifting. Guildford is a large town without a single butcher or fishmonger, showing that the Council need to use the fiscal and other mechanisms at its disposal to support niche retailers. To opt for large, impersonal department stores and dull high-street chain stores at the expense of Guildford's unique character would be an historic blunder. For this type of shopping, most residents can go to Waking or Kingston, whose ugly town centres should serve as a dire warning to Guildford planners.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1688  Respondent: 10933857 / C J Tilbury  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

OLICY E7 Guildford Town Centre

I OBJECT . The policy "vision" refers to protecting the Guildford's "unique setting" (including, surely, its surrounding Green Belt and countryside views) but this is not carried over into the formal policy wording in the blue box. It is therefore a worthless commitment.

There should be much more residential use of the town centre where most people, especially the young and less well-off, want to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose a visionary regeneration plan for the River Way/Walnut Tree Close area, where there is arguably enough brownfield land for 4,000 new homes, meeting near all the borough's housing need over the plan period without harming the countryside. There is an urgent need for a brownfield register and to focus on brownfield redevelopment before considering development outside the existing urban area. CIL strategy must promote brownfield redevelopment.

Strangely, the policy does not address any of the major issues raised by the Council's own Town Centre Master Plan, the Guildford Vision Group's proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public debate.

This policy also fails to provide guidance on design requirements, as required by the NPPF.11

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Attached documents:

Comment ID: PSLPP16/15373  Respondent: 10935201 / Cathryn Walton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7
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11 NPPF 59: “Local planning authorities should consider… the overall scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area. The policy does not address any of the major issues raised by the Council's own Town Centre Master Plan, the Guildford Vision Group's proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

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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:**

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**Comment ID:** PSLPP16/15824  **Respondent:** 10953249 / Charlotte Ladd  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy E7 Guildford Town Centre

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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:** PSLPP16/4656  **Respondent:** 10957025 / Pauline Masters  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E7
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY E7

I OBJECT to Policy E7 Guildford Town Centre

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Attached documents:

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Comment ID: PSLPP16/12290  Respondent: 10962689 / Martin Ladd  Agent: 10962689

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

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The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher 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: PSLPP16/14413  Respondent: 10962785 / Derek Gilmore  Agent: 10962785

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7
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: PSLPP16/12988  Respondent: 10972065 / Sarah Cocke  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY E7

I OBJECT to Policy E7 Guildford Town Centre

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8336  Respondent: 10990145 / Anne Lee  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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<th>Comment ID: PSLPP16/7429</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?**

Attached documents:

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**Comment ID:** PSLPP16/11194  **Respondent:** 10998081 / David Marshall  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

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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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Policy E7 - Guildford Town Centre

I object.

There is a need to use brownfield sites for residential development before considering development outside the urban area.

There should be more of a residential allocation in Guildford town centre which is where the young want to live.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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6. I object to the revised proposal in that flawed evidence continues to be relied upon to justify overexpansion, Guildford town centre needs more apartment homes not more shopping space. Online retailing is driving major change in ways of shopping, reducing the requirements for shop frontage there are numerous reports published on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
But do we really need so many additional shops when internet shopping is predicted to grow and grow.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the expansion of commercial land in the urban area losing the potential for further housing. Policy E7: Guildford Town Centre

There is no reliable evidence provided that the retail core of the Town Centre can support expansion of 45,000 sq m of additional retail space at North Street.

Online retail is set to account for 21.5% of total retail sales by 2018 from 12.7% in 2013, the highest online retail share in the world according to the Centre for Retail Research. March 2016, on line sales rose 12.3%, and it was the third consecutive month in which more than 20% of all non-food shopping took place online, (British Retail Consortium and accounting firm KPMG) With such a high retailers will need just 70 high street stores to create a national presence compared to 250 in the mid 2000's. An expansion on such a scale is negligent when the Council claims to be in such desperate need for housing.

Retail is a declining industry and should not be invested in by the Borough at the expense of housing in the most sustainable urban location, near employment and transport hubs.

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: PSLPP16/6967</th>
<th>Respondent: 11035361 / Marion Shipman</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7</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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<tr>
<td>There is brown field land available in the Guildford town centre which is being earmarked for commercial development rather than housing. This is more than enough to meet the housing needs by using this area. This is despite the evidence that shopping trends are moving online and retail is a declining industry. There is no reliable evidence that Town Centre can support expansion of 45,000 sq m of additional retail space in North Street. As shopping trends change to move online, retail is declining. The space should be used for housing and the money should be used to improve transport and other infrastructure.</td>
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<th>Comment ID: PSLPP16/15979</th>
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<td>I object to this policy on the grounds of its weak and ineffective wording.</td>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2575  Respondent: 11041601 / Robert Bayley  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E7
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 E7 Guildford Town Centre

• I object to the continued failure of this policy to provide much needed substantial residential development in the Town Centre which is still only a modest target of 1,300 homes. Only approximately 10% of the total planned for the Borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5510  Respondent: 11043553 / Geraldine Banks  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7
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Comment ID: PSLPP16/14609  Respondent: 11044129 / Christopher Barrass  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

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I OBJECT to Policy E7 Guildford Town Centre

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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:** PSLPP16/7587  **Respondent:** 11049473 / Victor Bates  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

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<th>Comment ID: PSLPP16/12332</th>
<th>Respondent: 11054049 / Clare Goodall</th>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16747  Respondent: 11070113 / Alison Hague  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7
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: PSLPP16/8836  Respondent: 11071553 / Nicholas Roberts  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
POLICY E7 (TOWN CENTRE) – I object. It doesn’t state how important rural surroundings and views are to the whole character of Guildford town centre. It doesn’t say anything about the Town Centre Master Plan, GVG proposals or redevelopment plans for the train station.

A major defect is the lack of any list or audit of brownfield sites that could be redeveloped in the town centre. As a result the percentage of total housing planned for the centre is astonishingly low compared with the huge new housing estates the council want to plonk in the countryside. This will only damage and delay the regeneration of the town, which is overdue.

There are no concrete measures to support small, independent shops – and too much encouragement of old-fashioned department stores and chain retailers. These would ruin Guildford centre’s character.

Fortunately, they will never be built because shopping is moving online and the vision of the high street presented in this policy is already obsolete.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12396  Respondent: 11074465 / Louise Vaughan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12500  Respondent: 11101345 / Katja Schilling-Bayley  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I strongly OBJECT to this policy on the grounds that is completely ignores the need for residential (rather than commercial) development within Guildford town centre and the use of brownfield sites before destroying the Green Belt.

This policy truly makes one wonder whether any member of the Policy drafting committee has recently visited Guildford town centre. A once vibrant and thriving market town, Guildford is now a sad, depressing shell of its former self, populated by empty shops and a growing number of cheap brands. There is falling demand for retail space in town centres throughout the country as internet shopping continues to grow (see independent research and CEBR studies). What Guildford needs is a new focus on speciality high quality shopping supported by a revival of the town’s heritage core, historic visitor attractions and a diverse selection of restaurants.

As an existing urban centre, it should furthermore receive a larger share of proposed new housing by making use of its brownfield sites. Paragraph 17 of the NPPF states that to “encourage the effective use of land by reusing land that has been previously developed (brownfield land)” is a core planning principle. Paragraph 80 of the NPPF clearly states that Green Belt serves a key purpose, “to assist in urban regeneration, by encouraging the recycling of derelict land and other urban land”. In order to comply with central planning policy we need a brownfield strategy. How can this be overlooked time and again??

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2021  Respondent: 11101345 / Katja Schilling-Bayley  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 Policy E7 Guildford Town Centre

- I am of the opinion that policy E7 is still very ill-informed and there is insufficient evidential support to objectively assess the capacity of the existing town centre to accommodate appropriate new development
- I also object to the continued failure of this policy to provide much needed substantial residential development in the Town Centre which is still only a modest target of 1,300 homes. Only approximately 10% of the total planned for the Borough. There is still a blind over concentration on retail expansion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attended documents:

Comment ID: pslp171/2664  Respondent: 11113249 / Holy Trinity Amenity Group (HTAG) (Bob Bromham)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

P94. “We will also take opportunities to reconnect the town centre to the amenity of the riverside”. This implies that the town centre is disconnected from the riverside, which is not true. The High Street is the historic, retail and service centre of the town, the main attraction for visitors, and the “brand” for the town. Its connection with the riverside, via the clearly visible pedestrianised and historic town bridge, could hardly be bettered. We ask that “reconnect” be replaced with improve the connection of.

P94. Policy E7. “41,000 sq m (gross) of additional comparison goods floorspace on the North Street regeneration site”.

As comment on P22 we consider this still to be too large.

P95. “approximately 1,300 new homes”.

While we welcome the provision of some new homes in the town centre we consider this target too high, particularly because of the need to provide much new infrastructure to support it. We ask for the target to be reduced.

P97. Monitoring indicator, 41,000sqm retail.

As P94, we consider this much too high, and unsupported by current predictions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attended documents:

Comment ID: PSLPP16/15850  Respondent: 11150913 / Sarah Marshall  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

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**Attached documents:**

Comment ID: PSLPP16/17215  **Respondent:**  11832961 / The National Trust - London and SE (Rachel Botcherby)

**Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Vision 2015**

We support the draft Vision for the town centre and Policy E7. As owners of the river bed and majority of towpath (but not adjoining land) and as the navigation authority we believe there is great potential to enhance the visual, amenity, historic and nature conservation value of the riverside and to integrate it more fully within the town centre. The implementation of this policy needs to be carried through in the development of proposals, and the determination of applications, for key town centre sites.

We note the Borough will continue to work on its Town Centre Masterplan document and the National Trust, as a key stakeholder, look forward to working with the Council in contributing to this document.

The Trust has prepared ‘Principles for development affecting the River Wey Corridor in Guildford Town Centre’ which consists of 10 bullet points. These were attached to our previous representations and are appended to this letter. We believe that, in line with the emphasis in the Plan on protecting and enhancing the historic environment (Policy D3), on Green and Blue Infrastructure (Policy I4) and because of the importance of the Navigations within the Town Centre, the Council should consider endorsing these key principles and append them to the Town Centre Policy or add them in the supporting text. Site specific considerations for each site allocation have also been highlighted for inclusion in various policies below. The National Trust considers these principles fundamental to the protection of the setting of the River Wey Conservation Area within the town centre.
All land and buildings owned by the National Trust in the centre of Guildford has been declared inalienable under the National Trust Act of 1907 and enjoy special protection.

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Attached documents:

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<th>Comment ID: PSLPP16/2480</th>
<th>Respondent: 14181313 / Vision for Guildford Ltd - GVG (William Stokoe)</th>
<th>Agent:</th>
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The Guildford Vision Group, a group of concerned residents with very relevant commercial and professional experience, was established four years ago to press for reinvigoration of the town centre. Specifically we have called for six objectives:

1. Wider pedestrianisation of the town centre
2. Exciting new public space along a reinvigorated riverside
3. Redirection of vehicle traffic away from the centre
4. An integrated transport hub and interchange around the rail station
5. New town centre housing
6. A new and better East-West link

These are not unusual or unique objectives. They are the aim of a multitude of UK towns and cities, where many have taken positive action to bring them about. Many would envy Guildford its magnificent setting and the river running through the centre of town, yet Guildford has failed significantly over the past decades to take full advantage of its potential, especially its river. Riverside areas are taken up by surface car parks, buildings with their back to the water and suffer a legacy of piecemeal, unattractive light industrial development. Walnut Tree Close and Woodbridge Meadows, in particular, should be given over to well-planned housing and the scattered light industrial provision should be relocated to an expanded Slyfield where infrastructure and communications would be better suited.

We are thus disappointed by the lack of real ambition and aspiration in the Local Plan in respect of the town centre. There are no substantial coordinated policies or strategies in the Local Plan that will achieve the six objectives above. These objectives have received wide public support, as recognised by:

- Our 2013 document 'Guildford on the Way', a Vision for Guildford in 2030 (attached) as articulated by members of the public, Guildford residents and our members
- Comments and feedback from our public meetings over the past four years that have regularly attracted audiences of 200 and above
- Feedback from our frequent Newsletters to our supporters, interested parties and councillors

The council, in response to our lobbying, commissioned a masterplan for the centre. The masterplan was drawn up by Allies & Morrison, nationally-renowned masterplanners. The masterplan was approved by the council in March 2016 but is yet to be adopted. There is little recognition or acknowledgement of the masterplan in either the Local Plan policies, underpinning information or implementation strategies. We understand that the council propose an Area Action Plan (AAP) for the town centre once the Local Plan is adopted. We are concerned that the AAP will be subject to challenge if its aims are not foreshadowed in the Local Plan. We believe omission of any mention of the AAP could render the Local Plan unsound in this respect.

We made a lengthy response to the Reg 18 consultation nearly 2 years ago. Our comments remain very relevant and are re-submitted for the Reg 19 consultation.
The Local Plan leaves a real vacuum in respect of the town centre and leaves it vulnerable to uncoordinated, opportunistic development. It will have no credible, well-articulated policies to forestall such development or any distinctive guide for development that will ensure the long run sustainability of the town centre and its economy.

The single, most significant omission regarding the town centre and its infrastructure is a cohesive plan to redirect traffic away from the centre via a new East/West link as proposed by GVG. This was mentioned in our previous Local Plan 2014 submission. A sketch of the link is reproduced here with the new rail/river bridge arrowed:

[see attached file 'GVG bridge route.jpeg']

Such a link would instantly enable wider pedestrianisation of the town centre – specifically Bridge and Onslow Streets – bringing a safer, less polluted environment. The bridge would also enable the reinvigoration of the riverside on both sides, below the bottom of North and High Streets, and the demolition of the ugly four lane concrete Friary Bridge that blights the character of our historic gap town at its very centre.

There is no attempt in the Local Plan to safeguard any potential route for such a new East/West link.

There has been no new town centre East/West link across the railway and river since the building of the Farnham Road Bridge in the 1840s. The Farnham Road bridge capacity is constrained, is rapidly approaching the end of its safe life and is too low for modern rail freight traffic (as set out in the rail ‘Wessex Plan’). The level and importance of development to the West of the town since 1840 should surely suggest a need for another link. The town centre and Guildford’s health and economy is at a disadvantage from inadequate and imperfect links to key sites such as the Royal Surrey Hospital, Surrey University, the Research Park with its world class and world leading facilities and activities. If large housing development is to be accommodated to the West of the town then there should be adequate provision for the inevitable increase in consequent vehicular traffic from such development, irrespective of the impact of modal shift and sustainable movement policies. Guildford is a gap town, with topographic constraints on solutions such as a ring road. The beauty of its setting also provides constraints.

Within a wider pedestrianisation in the town centre there should be provision for better pedestrian routes to the Cathedral and University. The Local Plan makes no attempt to achieve that, to the detriment of the town and its sense of community.

GVG is pro—growth and supports good, well designed development. Guildford Town Centre is about to undergo a sustained period of significant development, including creation of an additional 48,000sq m of retail and related space, principally via the redevelopment of North Street. It is hard, if not impossible, to discern from the Local Plan how such considerable development will be served by appropriate infrastructure. It is not clear what public benefits will accrue in the shape of new public space and better public realm. There is no sense of an overarching plan or design ethos that will support and enhance the historic core of the town that makes it so attractive to its residents and to a wide range of visitors.

In a well-meaning, almost obsessive, focus on its sustainable movement corridor and modal shift, the council leaves itself unfortunately blind to the need now for a modern transport interchange in the centre of town around the railway station. Guildford holds a key strategic position halfway between Heathrow and Gatwick airports and should seize all the opportunities that airport expansion will bring. The Local Plan has little if any comment or concrete plans regarding the rearrangement of bus services necessitated by the North St development.

Sadly the Guildford Vision Group therefore finds the Local Plan unsound, inadequate and unambitious in respect of the town centre.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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23 POLICY E7 TOWN CENTRE

23.1 I object to Policy E7 Guildford Town Centre

23.2 I am of the opinion that policy E7 is ill-informed and there is insufficient evidential support to objectively assess the capacity of the existing town centre to accommodate appropriate new development and therefore fails the requirements of Section 161 of the NPPF to assess the real quantitative and qualitative floor space needs.

23.3 Policy E7 is an aspirational voice from the past and is unlikely to benefit the health of the town centre in the future. There is no reliable evidence provided that the retail core of the Town Centre needs or can be expanded by 45,000 sq m of retail space at North Street because of lack of demand for retail units in the Town Centre particularly large units. This is due to falling demand for retail space in Guildford and town centres throughout the country evidenced by independent research and the reality of empty shops in many high streets (including Guildford) and the accelerating competition from internet shopping.

23.4 The failure of the North Street scheme to be redeveloped over the last ten years is a testament to lack of demand which has been so poor that the original planning permission for a large retail scheme became time expired.

23.5 The reality is that the town centre has enough retail floor space. If more is introduced it will result in the closure of existing shops particularly in locations which are less than 50% of peak Zone A or 100% positions. What Guildford needs is a new focus on specialty high quality comparison shopping supported by a revival of Guildford’s attractive heritage core and a new major visitor attraction supported by restaurants. Guildford needs to become the quality shopping destination for Surrey.

23.6 The existing site in North Street should be replaced with a well-designed ground floor high quality specialty retail mall and frontage of no more than 40 shops extending to 7,000 sq m with the rear and upper floors providing an additional 500 to 600 homes. The proportion of the above proposed smaller scheme at North Street will be complementary to and not antagonistic to the Upper High Street, Tunsgate, the Debenhams site and the 100% Zone A positions of the Lower High Street. If the existing policy under E7 is adopted the North Street site will remain empty for another 10 year.

23.7 The findings of the Guildford Retail and Leisure Study 25 September 2015 are very pessimistic about retail trends. Carter Jonas’s recent retail study reports a fairly bad time for retail, the bullets below are direct quotes from the report:

1. Para 3.3 Retail Trends “Town centres, once the principle focus for retail and leisure are now increasingly under threat”

2. Para 3.4 Retail Expenditure “disposable income and retailers’ margins are being squeezed further”

3. Para 3.5 “there has been limited growth in retail (convenience and comparison goods) expenditure per head since 2008”

4. Para 3.6 “the retail sector remains fragile and analysts forecast that some operators and centres will continue to struggle over the short to medium term”

5. Para 3.8 “completed new shopping centre floor space in the UK is currently at its lowest level since the 1990s”

6. Para 3.11 Internet Shopping “New forms of retailing have also emerged in recent years and are becoming established as significant alternatives to more traditional ‘bricks and mortar’ shopping facilities. Over the last 5 years, online sales have increased by 222%”

23.8 Despite the findings about retail we are told “evidence suggests that high quality schemes will continue to prosper.” What evidence?
23.9 Para 3.33 “the latest 2013-14 Javelin VenueScore17 ranks Guildford Town Centre within the UK’s top 50 shopping locations at 33. By contrast, Kingston-Upon-Thames is ranked 17th. Since 2007, Guildford Town Centre has fallen 20 places in the Venue Score ranking.”

23.10 Para 3.40 “The growth of online shopping is also impacting on the vitality and viability of many of Britain’s centres and high streets. This is placing pressures on rental growth and market demand in many centres, particularly secondary centres outside the ‘top 100’ shopping locations. This has been further compounded by rising vacancy levels and the loss of key retailers. As a result, the share of non-food retail sales conducted through town centre shops has declined, from 64% in 2002 to just over 40% by 2013. In our opinion, a far more uncertain future awaits the next “wave” of new retail investment and development. The evidence suggests that high quality schemes in the strongest prime shopping locations will continue to prosper.” Is this not an aspirational assumption?

23.11 Para 3.41 “Notwithstanding the threat of online shopping, industry experts still predict that the demand from major retailers for new space will continue as it remains the primary mechanism for retailers to ‘reach’ their customers and grow their businesses.” Who are these industry experts? Is this not an outdated concept and merely an aspiration of the British Council of Shopping Centres (BCSC)?

23.12 Appendix 6 of the Retail Study indicates potentially inaccurate demand data

23.13 Para 5.29 “The latest CoStar Report recorded 64 requirements for Guildford from January 2013 to August 2014; representing a total maximum floor space requirement of 62,208m2 gross (see Appendix 6).”

23.14 The Appendix 6 list of retailer demand looks impressive with brands such as Joules Clothing; Fossil; Comptoir des Cotonniers; Moshulu; Rituals; Princesse tam.tam; Cycle Surgery; Majestic Wine; Game Stores Group Ltd; Iceland. However, if we look closely at Appendix 6 it is an amalgam of old unchecked national high street requirements some of which do not even include Guildford as a destination and the majority are hardly high quality comparison retail. There are also no “big” requirements in terms of space. Where are the big stores?

23.15 GH Pressley & Sons – Watches and Silver- Requirement “They are seeking a flagship diamond store in central London. Target locations include Mayfair, St James, Kensington and Knightsbridge. Brands will include Hans D Krieger and Marco Bicego.” This does not sound like Guildford.

23.16 Oxygen Red Ltd – Ladieswear- Requirement “Oxygen Red is looking to acquire temporary stores in Shopping Centre locations within the M25” Guildford is well outside the M25.

23.17 The data relating to retail demand does not appear reliable. The 62,800 sq m does not translate to real demand for an expansion of 500,000 sq ft. If proper due diligence was applied perhaps 30% of this alleged Carter Jonas requirement would survive proper scrutiny.

24 THE TOWN CENTRE OPPORTUNITY

24.1 I do not consider that the target of 1,172 homes in the town centre takes account of the need and demand for housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town which will in itself help to sustain the retail core by increased economic impact. What the town centre needs in terms of urban regeneration is much more residential development. As can be seen from the previous section retail will not work!

24.2 The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015 which has recently been adopted by GBC. The reality is that the Town Centre and other areas of brownfield in the borough has the capacity for at least 5,000/7,500 homes.

24.3 The additional target capacity of 5,000 could easily be provided within the following urban sites which have the capacity for 7,500 homes:

- 2,500 homes detailed in Masterplan 2015 including Woodbridge Meadows which can itself be increased substantially
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1.1 I object to the changes in Policy E7 Guildford Town Centre

1.2 I am of the opinion that policy E7 is still very ill-informed and there is insufficient evidential support to objectively assess the capacity of the existing town centre to accommodate appropriate new development and therefore fails the requirements of Section 161 of the NPPF to assess the real quantitative and qualitative floor space needs.

1.3 Policy E7 is still an aspirational voice from the past and is unlikely to benefit the health of the town centre in the future. There is no reliable evidence provided that the retail core of the Town Centre needs or can be expanded by 41,000 sq m of retail space at North Street because of lack of demand for retail units in the Town Centre particularly large units. This is due to falling demand for retail space in Guildford and town centres throughout the country evidenced by independent research and the reality of empty shops in many high streets (including Guildford) and the accelerating competition from internet shopping.

1.4 The recent Carter Jonas Study Retail Study 2017 update predicts total demand for Guildford Town Centre by 2020 at only 3,313 sq m and only 34,811 sq m by 2036. We have now been waiting some 15 years + for demand to catch up to enable development of North Street where the old consent for some 40,000 sq m of retail had to be renewed because it was getting out of date. Are we now going to have to wait till 2036 only another 19 years for demand to get to the point to enable development of this much prized site which developers have not exactly been falling over themselves to develop. That is also assuming that all retail demand in the Town Centre is wanting just this site.

1.5 However optimistically and quite illogically they protest that “there still remains significant capacity to support new comparison goods floorspace over the plan period”. It’s a bit like saying in town x we have currently 100,000 m of shopping and the UK retail forecast done by Experian shows that we can predict a growth of 10% therefore this means we must have an additional 10,000 sq m in town x. This is unscientific guess work.

1.6 In table 2 Appendix 6 of their report we learn that there is a potential for turnover to reach £856.3m in the town centre by 2020 however actual committed floorspace take up accounts for only £1.3m of this. This is 0.15%. It is hardly surprising that there are no details of take up or real demand evidence given anywhere in the report.

1.7 The Carter Jonas report is based on broad brush retail capacity forecasting derived from work by Experian which is very far from site or location specific and as a retail supply and demand assessment in my view is totally unreliable. The source is not even Guildford specific or even Surrey specific. The authors of the report do not disagree with my cynicism with capacity forecasting since they state up front that “It should be noted at the outset that capacity forecasts carried out over a long period of time are inherently less certain and should be treated with caution” and repeated again “at the outset we advise that all capacity forecasts beyond a five year period should be treated with caution. This is because long term trends in the economy, consumer demand and retail property market could have a significant impact on the potential
capacity and need for new retail floorspace. For example, as discussed previously, a higher growth in non-store retail sales (i.e. Internet sales) than forecast by Experian would reduce the capacity for new retail floorspace over time.”

1.8 The Carter Jonas report is a vague whitewash report for a pre-conceived and outdated concept of increased retail development in the town centre. “For comparison goods, we have assumed the same estimations for convenience goods expenditure ‘inflow’ (10%) for Guildford Town Centre, again based on the centre’s role as a popular shopping and visitor destination.” Coming to the vague conclusion that Guildford is popular is far from reliable property market research!

1.9 The closest thing I can find to evidence of actual demand in this report is to read “In addition to focusing their attention on larger, dominant centres, many of the multiples and traditional high street retailers are changing their store formats and locational requirements. For example, key anchor retailers such as Boots, Next, Mothercare, TK Maxx, John Lewis and Marks & Spencer are actively seeking larger format units to showcase their full product range and to provide an exciting shopper environment backed by the latest (digital) technology.” But I then I realise this statement applies to any of 100 centres in the UK. I am concerned as to whether the authors of this retail study have actually visited Guildford or know where it is?

1.10 In their 2014/2015 reports Carter Jonas provided a fairly inaccurate picture of retail demand (originally Appendix 6) with the inclusion of retailers who had either gone bust or actually specified demand requirements in centres other than Guildford. This I note has now been deleted presumably because of its inaccuracies which were dealt with in my 2016 objection and has not been updated. We are now left with no demand assessment from either small, medium sized or large retailers. This does not support the view that Guildford is a vibrant retail destination requiring expansion with a large retail development in North Street.

1.11 The reality is that the town centre has enough retail floor space. If more is introduced it will result in the closure of existing shops particularly in locations which are less than 50% of peak Zone A or 100% positions. What Guildford needs is a new focus on speciality high quality comparison shopping supported by a revival of Guildford’s attractive heritage core and a new major visitor attraction supported by restaurants. Guildford needs to become the quality shopping destination for Surrey.

1.12 The existing site in North Street should be replaced with a well-designed ground floor high quality speciality retail mall and frontage of no more than 40 shops extending to 10,000 sq m with the rear and upper floors providing an additional 600 homes. The proportion of the above proposed smaller scheme at North Street will be complementary to and not antagonistic to the Upper High Street, Tunsgate, the Debenhams site and the 100% Zone A positions of the Lower High Street. If the existing policy under E7 is adopted the North Street site will remain empty for another 10 years.

1.13 I also object to the continued failure of this policy to provide much needed substantial residential development in the Town Centre which is still only a modest target of 1,300 homes. Only approximately 10% of the total planned for the Borough. There is still a blind over concentration on retail expansion which fails to take account of market forces and a complete failure to grasp the reality that a residential expansion is required to stimulate retail/leisure demand in the Town Centre which is markedly losing out to nearby centres such as Woking which has a very different approach. See the Town Centre Opportunity in next section.

1.14 I object to the deletion of the vision statement “Guildford town centre has a unique setting and historical character, and is at the centre of one of the most prosperous counties in England. We will protect and build on these assets and insist that all new development will be of the highest design and environmental standards. We will be proactive in building a great town centre which connects to the amenity of the riverside. We will invest in creating high quality public realm. We will put people above traffic and we will promote new high quality retail and business development. To achieve this we will develop innovative funding and delivery bodies. As we embark together towards this exciting future we pledge that we will continue and extend an active dialogue with our residents and other stakeholders.” Guildford Town Centre needs a decent vision. Without a vision the Town Centre is flying blind and it demonstrates the failure of the potential for imaginative Town development in this latest draft plan.

1.15 I support the deletion of paragraph 4.4.86 since many of the sites along the River Wey are capable of full development
1.16 I object to the deletion of the Allies and Morrison Masterplan as a source document for the plan since although it failed to fully exploit the development potential of the Town Centre it did include many good ideas including more extensive brownfield development extending to 2551 homes including Woodbridge Meadows as a residential development site.

1.17 I do not consider that the modest target of 1,300 homes in the town centre takes account of the need and demand for housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town which will in itself help to sustain the retail core by increased economic impact. What the town centre needs in terms of urban regeneration is much more residential development. As can be seen from the previous section, retail will not work!

1.18 The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015 which was originally adopted by GBC. The reality is that the Town Centre and other areas of brownfield in the borough has the capacity for at least 5,000/7,500 homes.

1.19 The additional target capacity of 5,000 could easily be provided within the following urban sites which have the capacity for 7,500 homes:

- 2,500 homes detailed in Masterplan 2015 including Woodbridge Meadows which can itself be increased substantially
- 500 homes at North Street
- 1000 homes on current GBC car parks (25 acres) and at the station
- 1000 homes saved in the urban area if 100% of students are accommodated on Surrey University campus (17 ha of car parks)
- 1000 homes at Slyfield on the 40 ha regeneration site
- 1000 windfall infill (50 per annum)
- 500 homes on brownfield sites in villages on sites of max 1ha which do not impact Green Belt

1.20 Yes, we need a new Local Plan for our borough in order to provide a development strategy within which we can accommodate our local housing, economic and environmental needs. But first we must make 100% use of our urban brownfield in the town before we consider building in the Green Belt or countryside.

1.21 Paragraph 80 of the NPPF clearly states that Green Belt serves a key purpose, “to assist in urban regeneration, by encouraging the recycling of derelict land and other urban land”. In order to comply with central planning policy we need a brownfield strategy that states clearly. “We are committed to a brownfield first initiative whereby all applications on previously developed land are given fast track priority and every facility to promote development for residential purposes and employment purposes in order to satisfy the needs of local people. In parallel a zero CIL incentive should be given for all residential development on brownfield land.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/8934  **Respondent:** 15107297 / Ian McQuattie  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

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1. OBJECT TO POLICY E7 (TOWN CENTRE):

- No statement in policy wording of value of Guildford’s rural setting and views.
- No consideration of Town Centre Master Plan, GVG proposals or station redevelopment plans.
Proportion of new housing in town far too small. Development pushed into countryside, ruining the latter and harming urban regeneration.

No brownfield register.

Too much big retail, despite online shopping revolution and decline of traditional high streets internationally. Futile to try to turn Guildford into Woking or Kingston.

No measures to support small, niche retailers in town, e.g. through business rates.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/936  Respondent: 15180929 / Torkil Fredborg  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I fully agree with Policy E7. Particularly the need to open up the river front and to improve access for cyclists and pedestrians across the town centre while reducing congestion

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1121  Respondent: 15196097 / Mark Groves and Katie Hamilton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the expansion of commercial land in the urban area losing the potential for further housing.
   Policy E7: Guildford Town Centre

There is no reliable evidence provided that the retail core of the Town Centre can support expansion of 45,000 sq m of additional retail space at North Street.

Online retail is set to account for 21.5% of total retail sales by 2018 from 12.7% in 2013, the highest online retail share in the world according to the Centre for Retail Research. March 2016, online sales rose 12.3%, and it was the third consecutive month in which more than 20% of all non-food shopping took place online, (British Retail Consortium and accounting firm KPMG) With such a high retailers will need just 70 high street stores to create a national presence compared to 250 in the mid 2000’s. An expansion on such a scale is negligent when the Council claims to be in such desperate need for housing.

Retail is a declining industry and should not be invested in by the Borough at the expense of housing in the most sustainable urban location, near employment and 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: PSLPP16/13746  Respondent: 15227905 / Nigel Alexander  Agent:
POLICY E7 Guildford Town Centre

I OBJECT. The policy "vision" refers to protecting the Guildford's "unique setting" (including, surely, its surrounding Green Belt and countryside views) but this is not carried over into the formal policy wording in the blue box. It is therefore a worthless commitment.

There should be much more residential use of the town centre where most people, especially the young and less well-off, want to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose a visionary regeneration plan for the River Way/Walnut Tree Close area, where there is arguably enough brownfield land for 4,000 new homes, meeting near all the borough's housing need over the plan period without harming the countryside. There is an urgent need for a brownfield register and to focus on brownfield redevelopment before considering development outside the existing urban area. CIL strategy must promote brownfield redevelopment.

Strangely, the policy does not address any of the major issues raised by the Council's own Town Centre Master Plan, the Guildford Vision Group's proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public debate.

This policy also fails to provide guidance on design requirements, as required by the NPPF.11

Instead, it is far too concerned with shopping. Town-centre shopping is in decline internationally as consumers move irreversibly online. There is no need to expand physical retail capacity or warehousing floorspace, which will only kill off existing shops while using up valuable housing land. The delays to the redevelopment of North Street is a flashing red light warning that consumer patterns are shifting. Guildford is a large town without a single butcher or fishmonger, showing that the Council need to use the fiscal and other mechanisms at its disposal to support niche retailers. To opt for large, impersonal department stores and dull high-street chain stores at the expense of Guildford's unique character would
be an historic blunder. For this type of shopping, most residents can go to Woking or Kingston, whose ugly town centres should serve as a dire warning to Guildford planners.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1766  Respondent: 15245313 / C.A. Lindsay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

E7 Guildford Town Centre

I object to the concentration on more retail sites. They just are not needed.

It is a sad thing to walk around existing shopping areas and see the numbers of empty shops.

Let the town centre be a place for people to live. Please use the brownfield sites for housing: aiming for a convivial, thriving town.

It would be lovely to have some safe areas for small children in the town centre and more outdoor seating.

I fear we are heading for empty, anonymous concrete canyons for people to drive to sometimes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2255  Respondent: 15263425 / Rosemary Napp  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The projection for retail space is far to high, preference should be given to residential housing. The comparison to Woking and Kingston is interesting, we specifically do not want our Town to resemble either of these. Development of the riverside area is supported.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2279  Respondent: 15275009 / Compton Parish Council (Fiona Curtis)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( )
We do not consider that the target of 1,172 homes in the town centre takes account of the need and demand for housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town which will in itself help to sustain the retail core by increased economic impact. What the town centre needs in terms of urban regeneration and to attain a thriving night time economy is more residential development. The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015. The reality is that the Town Centre and other areas of brownfield in the borough has the capacity to provide significantly more than this.

The omission of the Town Centre Master Plan impacts the soundness of the entire plan as the town is the most sustainable place in the Borough yet it is omitted? Changes to make Guildford more pedestrian friendly by reducing road capacity will impact surrounding areas, yet this has not been built into any Highways Assessments, which already reveal that development will cause congestion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2490  Respondent: 15282433 / Kentucky Fried Chicken (GB) Limited (Chris Holmes)  Agent: SSA Planning Limited (Steve Simms)

Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( No ), is Legally Compliant? ( Yes )

POSITIVELY PREPARED

The draft policy is not based on any objectively assessed development requirement. It effectively assesses the requirement for hot food takeaways within 500 metres of the boundary of a school as zero, but does so without evidence of either a link between the incidence of obesity and the proximity of hot food takeaways to such places or any particular distance at which that link is demonstrated. Consequently, the development requirement has not been objectively assessed.

In fact, the distance chosen could have the effect of banning hot food takeaways from a majority of the Borough. No assessment has been made of the number of hot food takeaways that might be refused as a result of this or what the social, economic or environmental impacts of that might be, so it is not possible to balance these impacts.

The policy is negative in its assumptions, using the concept of ‘unhealthy food’, which is at best unhelpful in isolation from an understanding of the person eating the food, their health and lifestyle, and at worst is simply subjective. Furthermore, it assumes all hot food takeaways offer little choice and serve the same type and standard of food.

We are further of the view that food of high energy density or poor nutritional value is sold from and at a range of premises within a variety of other classes, including many in Class A1, such as coffee or sandwich shops, bakeries or, simply, supermarkets, and that focussing on Class A5 uses is both unhelpful and unfair.

JUSTIFIED

There is no evidence for a causal link between the incidence of obesity and proximity of hot food takeaways to schools and only limited evidence of any correlation at all, so it is unclear how refusing planning permission for hot food takeaways within 500 metres of such locations could ever be justified.

The inclusion of primary schools is particularly problematic, as it is clear that children at primary schools are not usually permitted to leave the premises at lunchtime and, given their age, are unlikely to travel to or from school unaccompanied. Outside school time, children’s diets are quite properly the responsibility their parents or guardians.
Consequently, it is far from clear how refusing planning permission for hot food take-aways within 500 metres of primary schools could ever be justified. This was the view taken by a Planning Inspector in an appeal (APP/P4415/A/11/2159082) against refusal of a restaurant and hot food takeaway in January 2012.

The Evidence Base contains no evidence of any threshold number of hot food takeaways at which the harm that the draft policy seeks to mitigate occurs or is noticeably greater, nor any threshold distance. Indeed, there is no evidence of a causal spatial link between clusters of hot food and the incidence of obesity or overweight at all.

It is better to rely on objective evidence in a retail study to set maximum proportions of hot food takeaways. Whilst these are primarily directed at protecting the retail health of designated centres, there is scope to widen their application to support the retail health of retail provision outside centres, such as standalone or parade units.

As it is usually impractical to apply a maximum frontage proportion outside centres, the 500-metre walk distance might be applied, within which the proportion (rather than number) of units, be they in- or out-of-centre, used as hot food takeaways would not be permitted to exceed the same threshold as set for centres.

In adopting such an approach, it would be preferable to consider optimal proportions of all retail uses that could contribute to healthy centres or to a healthy offer generally, whether in- or out-of-centre, instead of focussing on particular uses considered to be a problem, apparently for wider social reasons unrelated to retail planning.

On a practical point, there is a significant difficulty in using distance radii in that it takes no account of real barriers, physical or perceptual, so that premises on the other side of a line feature such as a canal or busy road could be affected despite in reality being more than a 500m walk away. It is far better to use real walk isochrones.

EFFECTIVE

For the reasons set out, it is unclear how refusing permission for hot food takeaways within 500 metres of primary schools could ever be effective.

Some hot food takeaways, together with restaurants, pubs and shops are clearly a source of cheap, energy dense and nutrient poor foods, however, not all hot food takeaways, restaurants, pubs and shops are, and the planning system is ineffective in distinguishing between those that are and those that are not.

The area that would be affected by the policy could cover a large and variable part of the Borough, so it is hard to see how the effectiveness of its extent could be monitored. Would poor or negative achievement against objectives result in reduction or expansion of the zones? What other corrective action might be taken short of its withdrawal?

Diet is clearly a key determinant both of general health and obesity levels. Exercise is the other key determinant and must be considered for a complete picture. Focussing on improving access to open space, sport and recreation facilities would be a far more effective strategy for reducing childhood obesity.

CONSISTENT WITH NATIONAL POLICY

We consider that no regard has been given to national policy and advice in preparing Policy E7 because no National Planning Policy Framework (NPPF) policies deal with dietary issues.

Specifically, taking into account proximity of hot food takeaways to schools has no basis in national policy and national practice guidance simply refers to a briefing paper containing case studies on the issue. Indeed, restricting accessibility to services and facilities is directly contrary to national policy.

The NPPF recognises the role planning takes in better enabling people to live healthier lifestyles. However, it seeks to do this by creating, not restricting choice, by increasing access to recreation and health services, and by ensuring developments are within walkable distances of local facilities and public transport to other facilities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<th>Comment ID: pslp171/1153</th>
<th>Respondent: 15282433 / Kentucky Fried Chicken (GB) Limited (Chris Holmes)</th>
<th>Agent: SSA Planning Limited (Steve Simms)</th>
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<td>(Yes), is Sound? (No), is Legally Compliant? (Yes)</td>
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<td><strong>Whilst we support the change to include A5 as well as A3 as acceptable uses within secondary frontages, we maintain our objection to section (6) of policy E7.</strong></td>
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<td><strong>Maintain the heritage of the town. Build within the town to an appropriate design, venacular and stature. Design space well in order to increase the visitor experience with flow and vista. Do something about the current eyesores, especially the bus station - at the moment a complete disgrace particularly as people are meant to be be encouraged to use the bus!</strong></td>
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| Comment ID: PSLPP16/2874 | Respondent: 15301089 / Brian Yeomans | Agent: |
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy E7: Guildford Town Centre

I OBJECT to this policy

There should be much more residential use of the town centre. There is limited need for further retail, which will disadvantage existing retailers as well as using valuable land inefficiently. There is an urgent need for a brownfield register and to focus on brownfield redevelopment before considering development outside the existing urban area. CIL strategy must promote brownfield redevelopment

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3006  Respondent: 15304929 / Rosemary Wood  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy E7 Guildford Town Centre.

The policy "vision' describes protecting the Guildford's unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council's own Town Centre Master Plan, the Guildford Vision Group's proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford's character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3453  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 E7 Guildford Town Centre**

- No statement in policy wording of value of Guildford’s rural setting and views.
- No consideration of Town Centre Master Plan, GVG proposals or station redevelopment plans.
- Proportion of new housing in town far too small. Development pushed into countryside, ruining the latter and harming urban regeneration.
- No brownfield register.
- Too much big retail, despite online shopping revolution and decline of traditional high streets internationally. Futile to try to turn Guildford into Woking or Kingston.
- No measures to support small, niche retailers in town, e.g. through business rates.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/9581  **Respondent:** 15360321 / Jean Miller  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

**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 additional retail development proposed in the Plan. This seems to ignore changes in shopping habits and the impact of the internet.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/4407  **Respondent:** 15367361 / Greg Ganjou  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

1. **POLICY E7**

I OBJECT to Policy E7 Guildford Town Centre

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The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

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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: PSLPP16/4438   Respondent: 15368129 / Sharon Cork   Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E7  
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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I OBJECT to Policy E7 Guildford Town Centre

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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: PSLPP16/4694  Respondent: 15371777 / Peter Thackery  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

7. I object to the expansion of commercial land in the urban area losing the potential for further housing.  
**Policy E7: Guildford Town Centre**

There is no reliable evidence provided that the retail core of the Town Centre can support expansion of 45,000 sq m of additional retail space at North Street.

Online retail is set to account for 21.5% of total retail sales by 2018 from 12.7% in 2013, the highest online retail share in the world according to the Centre for Retail Research. March 2016, online sales rose 12.3%, and it was the third consecutive month in which more than 20% of all non-food shopping took place online (British Retail Consortium and accounting firm KPMG) With such a high retailers will need just 70 high street stores to create a national presence compared to 250 in the mid 2000's. An expansion on such a scale is negligent when the Council claims to be in such desperate need for housing.

Retail is a declining industry and should not be invested in by the Borough at the expense of housing in the most sustainable urban location, near employment and transport hubs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICY E7 Guildford Town Centre

Grounds for Objection. There should be much more residential use of the town centre. There is limited need for further retail, which will disadvantage existing retailers as well as using valuable land inefficiently. Existing niche retailers should be supported, but this does not mean further retail expansion which could be counterproductive. There is an urgent need for a brownfield register and to focus on brownfield redevelopment before considering development outside the existing urban area. CIL strategy must promote brownfield redevelopment. Guildford should strive for high quality definition making it a great centre for people to live in and visit. It would be a great mistake if Guildford were to opt for large impersonal department stores and dull high street chain stores at the expense of exploiting its uniqueness and character which would afford greater benefits.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
### Comment ID: PSLPP16/4941  
**Respondent:** 15381089 / Tim Poyntz  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

#### Do you consider this section of the document: complies with the Duty to Cooperate? ( )  
is Sound? ( )  
is Legally Compliant? ( )

14. **POLICY E7**

I OBJECT to Policy E7 Guildford Town Centre

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There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion. The policy also fails to provide guidance on design requirements, as required by the NPPF.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

### Attached documents:

### Comment ID: PSLPP16/4966  
**Respondent:** 15381249 / Helen Poyntz  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

#### Do you consider this section of the document: complies with the Duty to Cooperate? ( )  
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5157  Respondent: 15386337 / Edna Slater  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7
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: PSLPP16/5199  Respondent: 15388673 / Bruce Stewart  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7
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:** PSLPP16/5687  **Respondent:** 15406017 / Eleanor Roberts  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

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<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/5718</th>
<th>Respondent: 15406529 / David I Allan</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7</td>
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<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/6016</th>
<th>Respondent: 15420833 / Marjorie Moss</th>
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Attached documents:

Comment ID: PSLPP16/6216  Respondent: 15426305 / I C Dean  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY E7 Guildford Town Centre

I object to this policy.

1. The “vision” describes protecting Guildford’s unique setting and historical character and sets out some of the ways this will be However the policy and supporting text concentrate too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. Above all, the retail development proposals must not damage the viability of the High Street.

2. There is little reference to the major elements of the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discuss As a policy for the town centre for the next 20 years it is lamentably short-sighted and narrow in its ambition.

3. There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exi The policy misses the opportunity to propose forward looking sustainable residential development in, for example the Walnut Tree Close/Woodbridge Meadows area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the Plan period without harming the countryside.

4. There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

5. The policy fails to provide guidance on design requirements, as required by the NPPF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6270  Respondent: 15427617 / Ken Scotland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
1. POLICY E7

I OBJECT to Policy E7 Guildford Town Centre.

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<tr>
<th>Comment ID: PSLPP16/6313</th>
<th>Respondent: 15428097 / Bridget McClellan</th>
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Retail Space is planned at 40% growth, clearly going against trends in retailing and internet shopping, and Post Brexit economy influences. This is clearly UNSOUND planning. The need for less traffic in the already congested town centre should be given priority over more development. There will be less need for the proposed 1000 car park and ride, not more. Any needed development should be done on BROWNFIELD sites that will no doubt appear in town as the retail sector reduces, NOT on pristine country rural Green Belt.

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Attached documents:
**Comment ID:** PSLPP16/7430  **Respondent:** 15448449 / Carol Roberts  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will 'affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/7637  **Respondent:** 15450817 / Audrey Gachen  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

**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:** PSLPP16/17357  **Respondent:** 15460737 / Donna Collinson  **Agent:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

“a new retail-led, mixed-use development of 45,000 sq m (gross) of additional comparison goods floorspace on the North Street regeneration site within its primary shopping area.”

We question the wisdom of expanding retail floor space on this scale given the demand from competing priorities in our constrained town and given the need to ensure resilience for the high street in the face of trends in retailing.

“approximately 1,172 new homes, particularly on upper floors as part of mixed use developments;”

Homes should not be confined to upper floors and care needs to be taken to ensure development heights are stepped to reflect the rise of the land. Extensive residential storeys, all on one level on top of large retail units, should be avoided.

Vision

The objective of giving pedestrians priority needs to be qualified. The extent of pedestrian areas needs to be tempered by the reality that Guildford is a crossing point in the downs and that its geography is not amenable to a ring road strategy that normally accompanies extensive pedestrianisation. If central roads are closed to through traffic, vehicles will be displaced to more residential and rural roads with unacceptable consequences. Further, steep slopes mean there is a requirement for access to transport along the length of the main shopping streets to help those who cannot cope with the gradients. This means you cannot adopt an approach of bus stops around the periphery of the retail area with no central interchange.

Object: See comments on questions 1 and 3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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**Attached documents:**

**Comment ID: PSLPP16/8695  Respondent: 15474849 / Timothy Yorath  Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7**

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**Attached documents:**

**Comment ID: PSLPP16/8778  Respondent: 15476289 / Gregory Heffer  Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7**
I object to the expansion of commercial land in the urban area losing the potential for further housing. Policy E7: Guildford Town Centre

There is no reliable evidence provided that the retail core of the Town Centre can support expansion of 45,000 sq m of additional retail space at North Street.

Online retail is set to account for 21.5% of total retail sales by 2018 from 12.7% in 2013, the highest online retail share in the world according to the Centre for Retail Research. March 2016, online sales rose 12.3%, and it was the third consecutive month in which more than 20% of all non-food shopping took place online, (British Retail Consortium and accounting firm KPMG) With such a high retailers will need just 70 high street stores to create a national presence compared to 250 in the mid 2000’s. An expansion on such a scale is negligent when the Council claims to be in such desperate need for housing.

Retail is a declining industry and should not be invested in by the Borough at the expense of housing in the most sustainable urban location, near employment and transport hubs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPP16/8935  Respondent: 15478017 / Kirstie Pankhurst  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

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Comment ID: PSLPP16/9024  Respondent: 15478177 / Michelle Brown  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

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Comment ID: PSLPP16/9335  Respondent: 15481409 / Amy F Corstin  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7
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Attached documents:

Comment ID: PSLPP16/9999  Respondent: 15495521 / Jonathan Young  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to Policy E7: Guildford Town Centre

I object to the strategic principle that the town centre requires considerable additional retail floor space, when there are consistently vacant retail properties. The level of vacancies varies with the ebb and flow of the national economy, but essentially there has never been a point that I can remember in the 28 years I have lived in or around Guildford where there has been a constraint on retail occupation in the town centre. The future of retail businesses in the UK should be considered - in general additional floor space (and therefore cost overheads) will give way to a click&collect experience where internet shopping and retail collection coupled with an emphasis on showcasing rather than retail stock management will result in a shopping culture that operates with a reduced physical foot print.

Instead, I believe more emphasis should be given to providing additional housing in the town centre, increasing the community focus and creating a significant urban contribution to the housing demand rather than identifying “strategic sites” which are generally in greenbelt. Thus the whole basis of the strategy for the Local Plan is flawed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10043  Respondent: 15495873 / Gerard Duvé  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Guildford Town Centre

I object that GBC do not accept the town centre as the perfect place for sustainable development. Internet shopping has changed the retail landscape so only limited new shops are required. Guildford will have ample opportunity to provide sustainable homes over the Local Plan period.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10244  Respondent: 15498529 / Donna Smith  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

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Policies E7 Guildford Town Centre and E9 Local Centres.

1. Introduction
1.1 We have considered the above policies with regard to the principles set out within the Framework. Local Plans should “plan” positively for development; be justified; effective; and consistent with the Framework. Policy E7 and E9 are therefore considered not sound.
1.2 We consider that limiting the number and location of hot food takeaways in such a way would be unsound. By way of overview, the Framework provides no justification at all for using the development control system to seek to influence people's dietary choices. Minimal justification has been issued for 500m exclusion zone, and there is no evidence to justify such an approach.

2. Policies E7 and E9 are not positive, justified, effective or consistent with the Framework.
2.1 Restricting the location and concentration of new A5 proposals within the Borough is not a positive approach to planning. The Frameworks “foreword” promotes sustainable development this is about positive growth, making economic, environmental and social progress for this and future generations.
2.2 As worded, the policy E7 takes an ambiguous view of A5 uses in relation to schools. It applies an over-generic approach to resist development with little sound planning reasoning or planning justification. This is contrary to Para 14 of the Framework which advises authorities to positively seek opportunities to meet development needs of their area.

2.3 The policy is inconsistent with Para 19 and 21 of the Framework. Para 19 states: Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system.

2.4 Para 21 states:
Investment in business should not be over-burdened by the combined requirements of planning policy expectations.

2.5 The Inspectorate recently concluded that the Greenwich Local Plan would be unsound if it contained the attempt in paragraph 4.3.55 to restrict new hot food takeaways within 400 m of a school. The Inspectors Report published May 2014 confirms “If such a restriction is to be imposed as a matter of policy then it must be included in Policy TC(c). However, I do not consider that such a restriction serves any land use planning purpose. In any event, I can foresee difficulties in attempting to implement such a restriction. For example, what criteria would be used to determine “unhealthy” food, and how frequently would this be assessed for an individual business? In addition, the practicalities of enforcement at a time when public expenditure is being reduced may render such a policy incapable of enforcement. Whilst it may be a laudable aim, the Local Plan would be unsound if it contained this provision.”

2.6 There is a lack of evidence to demonstrate the link between fast food, school proximity and obesity. We confirm this at Appendix A to this objection. This appears to be recognised by the use of the word ‘potential’ in the policy. There is no evidence and the statement in the draft policy should be removed.

2.7 A systematic review of the existing evidence base by Oxford University (December 2013), funded by the NHS and the British Heart Foundation ‘did not find strong evidence at this time to justify policies related to regulating the food environments around schools.’ It instead highlighted the need to ‘develop a higher quality evidence base’.

2.8 This lack of evidence has been confirmed in a number of planning decisions. For example, in South Ribble the Planning Inspectorate raised concerns about a similar 400m school proximity restriction on fast food, stating ‘the evidence base does not adequately justify the need for such a policy’, and due to the lack of information, it is impossible to ‘assess their likely impact on the town, district or local centres’.

2.9 The evidence provided at Appendix B confirms that 70% of purchases by students in the school fringe are purchased in non A5 shops.

2.10 Policy E7 does not restrict the location of new A1, A3 or A4 uses within the 500m zones and therefore the sale of food and drink will still occur. The proposed approach is therefore not effective and is unjustified. The policy will place a moratorium against one use class of development, but will not meet the ambition of the policy.

2.11 There is lack of evidence to demonstrate that purchases in fast food outlets are any more or less healthy than purchases in other A Class premises. Evidence confirming this is set out in Appendix C.

2.12 Research by Peter Dolton states that “At least 50% of the days in a year kids don’t go to school if we count weekends and holidays and absence. They are only there for 6 hours and all but 1 are lessons. So only around 2-3% of the time can [children] get fast food at school.” This clarifies that a blanket restriction on location is unjustified.

2.13 Similarly, research by Brighton & Hove concluded that ‘the greatest influence over whether students choose to access unhealthy food is the policy of the individual schools regarding allowing students to leave school premises during the day’.

Footnotes

1 J Williams, P Scarborough, A Matthews, G Cowburn, C Foster, N Roberts and M Rayner, Nuffield Department of Population Health, University of Oxford, page 13, 11th December 2013. A systematic review of the influence of the retail food environment around schools on obesity-related outcomes.
2 Letter to South Ribble Borough Council, 29th April 2013, from Susan Heywood, Senior Housing & Planning Inspector, The Planning Inspectorate
5 Brighton & Hove City Council & NHS Sussex, Hot-food takeaways near schools; An impact study on takeaways near secondary schools in Brighton and Hove, page 30, September 2011
2.14 Only limited purchases of food are made at A5 uses on journeys to and from school. Further details are set out in Appendix D.
2.15 Given the limited access that children have to fast food during the school day, this generic restriction is disproportionate; is not justified; and would not be effective.

3. Soundness – summary
3.1 We consider that restricting the concentration and location of hot food takeaways as proposed would be unsound and fails to meet the four tests of the Framework. It is not a positive approach to planning; justified; effective; or consistent with national planning policy.
3.2 The Inspectorate with regard to the Greenwich Local Plan concluded that he does not consider that such a restriction serves any land use planning purpose. Furthermore the Inspector confirmed that he could foresee difficulties in attempting to implement such a restriction. Such a policy should therefore not be taken forward. No alternative wording or alterations can be suggested that would make the proposed policy sound.
3.3 Many restaurant operators have made major steps to expand the range of healthy options and work with the communities within which they are / will be part of. No account has been considered in relation to the food sold from different types of outlet.

4. McDonald’s has made major steps in recent years to expand the range of healthy offerings
4.1 As a responsible business, McDonald’s recognises it has a role to play to support its staff, customers, and the communities in which it operates to live healthier lifestyles. For this reason, McDonald’s has invested significantly to evolve its menu over the last 10 years – both to extend the range of choice, and to reformulate our products. For example, McDonald’s has:
  * Added porridge, salads, grilled chicken wraps, carrot sticks, fruit bags, orange juice, mineral water, and organic milk to its menu
  * Completely removed hydrogenated trans-fats from its menu
  * Reduced salt in our Chicken McNuggets by 36%, and our fries by a quarter since 2003
  * Reduced fat in its milkshakes by 34% per serving since 2010
  * Reduced fat in its deli rolls by 42% since 2011
4.2 McDonald’s has also led the way displaying nutritional information to help its customers make informed choices. Since 2011, McDonald’s has provided calorie information on every one of its 1,200+ menu boards in restaurants across the UK.
4.3 This is in addition to the nutritional information that is already available on its website, on its tray liners, on its packaging, and via McDonald’s mobile phone app. In 2012 alone, McDonald’s received 2.2 million visits to its nutrition web page.
4.4 Furthermore, McDonald’s is committed to responsible advertising, and advertise to children only food items that are not classified by the Government’s nutrient scoring criteria as High in Fat, Salt or Sugar “non-HFSS”. All of McDonald’s advertising to children features at least one portion of fruit or vegetables, and a no added sugar beverage such as milk.
4.5 As a significant customer of British farming, McDonald’s buys quality ingredients from 17,500 UK and Irish farmers. It now spends more than £390 million every year on British and Irish produce, compared to £269 million in 2009. 4.6 All of McDonald’s burgers are made with 100% British and Irish beef. We use whole cuts of forequarter and flank, with nothing added or taken away in the process.
4.7 In addition, McDonald’s only uses 100% British RSPCA Freedom Food Pork across its entire menu. As a result, all pork suppliers are required to meet strict animal welfare standards.
4.8 McDonald’s was also one of the first retailers to switch to using free range eggs – which it did back in 1998. Free range eggs are now used in its entire menu – including its sauces, muffins and the coating on chicken nuggets. Every year McDonald’s use over 100 million free range eggs, sourced from more than 200 UK producers, and for its work in this area they have been awarded ‘Food Business of the Year’ by the British Free Range Egg Producers Association.
4.9 The strength of McDonald’s supply chain – which was clear of any horsemeat – has also been confirmed by Professor Chris Elliott, who said in light of the horsemeat scandal: “McDonald’s invited us to look at farms and abattoirs – it was a very simple supply chain. The other thing I was very impressed about was the length of contract McDonald’s had with its suppliers.”
5. McDonald’s also contributes to the community
5.1 As the Community Partner of the Football Association, McDonald’s has helped to train and recruit more than 25,000 coaches. These coaches in turn have provided more than 2 million hours of free quality coaching, to one million young players.
5.2 Over 1,000 McDonald’s restaurants across the UK are ‘twinned’ with a local team to provide free kit, equipment,
advice and expertise.

5.3 Each of McDonald’s restaurants also conduct a minimum of three litter patrols on a daily basis, and conduct larger Love Where You Live ‘clean up’ events. McDonald’s is also the primary sponsor of the Mayor of London’s Capital Clean Up campaign, to tackle litter across London.

5.4 Last year, McDonald’s restaurants in Greater London organised over 50 community clean-up events, with over 1,400 volunteers taking part.

6. McDonald’s is a major employer of young people

6.1 McDonald’s is a major employer of young people under the age of 25, and for many it provides a first step on the career ladder. McDonald’s offers all staff the opportunity to gain qualifications which include Adult Certificates in English and Maths, a Level 2 Apprenticeship, and a Foundation Degree in Managing Business Operations.

6.2 McDonald’s invest £43 million annually in staff training and development.

7. There is a lack of evidence to demonstrate whether fast food is located by schools, or whether schools are located by town centres

7.1 When McDonald’s looks at the economic viability of a new site, it does not factor in predicted sales from school children or proximity to schools.

Footnotes

6 Evidence at Environment, Food & Rural Affairs Select Committee Inquiry, January 2014

7.2 Research by Christoph Buck has identified a similar approach with other retailers. His research suggests that ‘food retailers are mainly located near major roads and in inner cities.’
7.3 Indeed, ‘food retailers are not clustered around schools for up to 1.5 km’ Correlations between schools and fast food density are therefore due to the proximity of both to town centres, where there is a broad mix of retail on offer.
7.4 With a policy restricting location in place, all A5 development would likely be directed away from major, district and local centres – contrary to the sequential test.

Appendix A – There is a lack of evidence to demonstrate the link between fast food, school proximity, and obesity.

1. This has been confirmed by Public Health England and the Local Government Association (November 2013). Their paper, Healthy People, Healthy Places states there is ‘an unavoidable lack of evidence that can demonstrate a causal link’ between fast food, school proximity and obesity.

2. The same paper states there are only ‘theoretical arguments for the value of restricting the growth in fast food outlets’.

3. Oxford University’s Department of Population Health conducted ‘A systematic review of the influence of the retail food environment around schools on obesity-related outcomes’ (December 2013). This was funded by NHS Berkshire and the British Heart Foundation, and is a comprehensive analysis of the existing evidence base.

4. The research ‘did not find strong evidence at this time to justify policies related to regulating the food environments around schools’. It instead highlighted the need to develop a ‘higher quality evidence base’ which for instance:
- Uses a consistent way to classify a food outlet, in order to compare results from different studies
- Looks at the age range of children, and their interaction with the environment. Age can influence travel time, distance travelled, the availability of pocket change, and other factors
- Understands the need to assess a child’s mode of travel to and from school in decisions about appropriate buffer distances
- Recognises that food environments vary between countries – most associations between food environment and obesity came from North America

5. The review did find some limited evidence for an effect of the school environment on body weight, but it added ‘these results should be interpreted cautiously’. Of 72 associations, only 19 showed a statistically significant positive
relationship between body weight and exposure to food outlets. The review also identified associations with convenience stores as well as fast food outlets.

Footnotes

8 Christoph Buck et al. Clustering of unhealthy food around German schools and its influence on dietary behaviour in school children: a pilot study, page 6, 2013
9 Public Health England & LGA, Healthy people, healthy places briefing: Obesity and the environment: regulating the growth of fast food outlets, page 5, November 2013
10 J Williams, P Scarborough, A Matthews, G Cowburn, C Foster, N Roberts and M Rayner, Nuffield Department of Population Health, University of Oxford, page 13, 11th December 2013. A systematic review of the influence of the retail food environment around schools on obesity-related outcomes.

6. A number of studies have reached similar conclusions. These include, but are not limited to:
- David Harris – ‘no correlation between students’ being overweight risk and the presence of stores with unhealthful food choices near their schools.’11
- Philip Howard – Research ‘failed to find a consistent association between school overweight rates and nearby fast food restaurants’.12 If anything, this research found ‘Convenience stores demonstrated stronger correlations with school overweight rates’.
- An and Sturm – ‘no evidence to support the hypotheses that… less exposure to fast-food restaurants or convenience stores within walking distance improve diet quality or reduce BMI among Californian youth.’13
- Fleischhacker – This systematic review of fast food access studies concluded 53% did not find any significant associations between the fast food environment and obesity. ‘In children, only one of five studies found an association between BMI and the fast food environment.’14

7. This lack of evidence has also been confirmed in a number of planning decisions.
- For example, in South Ribble the Planning Inspectorate raised concerns about a similar 400m school proximity restriction on fast food, stating ‘the evidence base does not adequately justify the need for such a policy’, and due to the lack of information, it is impossible to ‘assess their likely impact on the town, district or local centres’.15
- Further, in Newham the Planning Inspectorate called for ‘deletion of an exclusion zone for A5 use class within 400m of secondary schools’ as ‘the policy is not supported by the evidence at present’.16

Footnotes

11 David Harris et al. Location of Food Stores Near Schools Does Not Predict the Weight Status of Maine High School Students, page 276, 2011 - http://ac.els-cdn.com/S1499404610004574/1-s2.0-S1499404610004574-main.pdf?_tid=720c269e-c3d7-11e3-874e-00000aab0f01&acdnat=1397481765_c271ecb04c8e2d5970dbc420d656f128
12 Philip Howard et al. Proximity of food retailers to schools and rates of ninth grade students: an ecological study in California, page 6, 2011
14 S Fleischhacker et al. A systematic review of fast food access studies, page 8, 17th December 2009
15 Letter to South Ribble Borough Council, 29th April 2013, from Susan Heywood, Senior Housing & Planning Inspector, The Planning Inspectorate
Appendix B – Food in the school fringe tends to be purchased in non-A5 properties.
1. Research by Professor Jack Winkler (London Metropolitan University) into the ‘school fringe’ – found just 3/10 purchases by students in a 400m school fringe were made in A5 properties.17
2. 70% of purchases in the school fringe were made in non-fast food outlets, and the same research concluded ‘the most popular shop near Urban was the supermarket, with more visits than all takeaways put together’.
3. Professor Winkler’s findings are not an isolated case. A report by Public Health England and the LGA states that fast food school proximity restrictions do ‘not address sweets and other high-calorie food that children can buy in shops near schools.’18
4. Research by Brighton and Hove found that ‘Newsagents were the most popular premises [in the school fringe], with more pupils visiting newsagents than any A5 premises’.19
5. Likewise, research for the Food Standards Agency on purchasing habits in Scotland found that ‘Supermarkets were the place that children reported they most frequently bought food or drinks from at lunchtime’.20
6. Indeed, there are several more researchers who have found no evidence to support the hypothesis that less exposure to fast food, or better access to supermarkets are related to higher diet quality or lower BMI in children.21 22 23

Footnotes
18 Public Health England & LGA, Healthy people, healthy places briefing: Obesity and the environment: regulating the growth of fast food outlets, page 5, November 2013
19 Brighton & Hove City Council & NHS Sussex, Hot-food takeaways near schools; An impact study on takeaways near secondary schools in Brighton and Hove, page 28, September 2011

Appendix C – There is a lack of evidence to demonstrate that purchases in fast food outlets are any more or less healthy than purchases in other A class premises.
1. A key finding of Brighton & Hove’s research was that ‘newsagents and supermarkets [are] equally as influential on the unhealthy choices of pupils.’24
2. Hot food take-aways are identified as a particular concern, but there is a lack of evidence to inform why A5 units have been identified as a concern over other units, namely A1 and A3 units.
3. Research by the Children’s Food Trust for instance found that ‘Once outside school… students faced an environment designed to encourage less healthy food purchasing, mostly from corner shops and supermarkets near to school, outlets which successfully promoted less healthy foods to this population.’25
4. The report added ‘this study observed no visits to takeaway outlets’ – although it did qualify this saying a ‘larger, more representative study’ was required to determine whether proposals to restrict A5 outlets are effective in promoting healthier eating habits in teenagers.
5. Similarly, research elsewhere found ‘traditional fast food outlets offered a greater variety of healthier breakfast entrees, healthier lunch/dinner entrees, and healthier lunch/dinner side dishes’ than convenience stores, grocery stores, and supermarkets.26
6. We therefore assert that sole inclusion of A5 premises is irrational, will not be effective, and is therefore not justified.
Appendix D – Only a limited number of journeys to and from school involve a purchase at a food outlet.
7. This has been confirmed in research by the Children’s Food Trust, which found that only 8% of all journeys to and from school included a purchasing visit to a food outlet.27
8. Of the food purchases made on school journeys, confectionary was the most popular item sold – which McDonald’s does not offer on its menu.
9. Likewise, research by Ashelsha Datar concluded that children ‘may not purchase significant amounts of junk food in school’ – partly due to ‘fewer discretionary resources to purchase them’.28
10. Indeed, even where purchases were made, ‘children may not change their overall consumption of junk food because junk food purchased in school simply substitutes for junk food brought from home.’
11. Similarly, research by Fleischhacker highlighted the need for future school-based studies to ‘gather information on whether or not the students attending the studied schools actually eat at the restaurants near their schools.’29
12. This was also highlighted in the systematic review by Oxford University, which states ‘future work should also incorporate a child’s usual mode of travel to and from school into decisions about appropriate buffer distances.’ The review added that age should also be taken into consideration, as this can impact on travel time and the availability of pocket change.30

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The policy "vision" describes protecting the Guildford's unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council's own Town Centre Master Plan, the Guildford Vision Group's proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford's character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10653  Respondent: 15502241 / Richard Atkinson  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy E7 Guildford Town Centre

The policy "vision" describes protecting the Guildford's unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

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The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10558  Respondent: 15504001 / Margaret Banks  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11082  Respondent: 15509057 / Richard Golding  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT. The policy “vision” refers to protecting the Guildford’s “unique setting” (including, surely, its surrounding Green Belt and countryside views) but this is not carried over into the formal policy wording in the blue box. It is therefore a worthless commitment. There should be much more residential uses of the town centre where most people, especially the young and less well-off, want to live and where the necessary amenities and infrastructure exist. But all the council thinks of is more retail development surely the dinosaurs in the planning department must have realized that shopping is moving on line, and if any more retail space is provided it will have a very negative effect on the traditional shopping area like the High Street. The policy misses the opportunity to propose a visionary regeneration plan for the River Wey/Walnut Tree Close area, where there is arguably enough brownfield land for 4,000 new homes, meeting near all the borough’s housing need over the plan period without harming the countryside. There is an urgent need for a brownfield register and to focus on brownfield redevelopment before considering development outside the existing urban area. CIL strategy must promote brownfield redevelopment. Yet the local plan totally ignores the Council own plan for the Town centre, the redevelopment of the railway station and the Vision group proposal for a new rail river crossing. It also ignores the NPPF requirements to provide guidance on design requirements.

The plan only seems to be interest in increasing the shopping area even thought this requirement in a town is in decline.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11273  Respondent: 15570145 / Owen Eszeki  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Policy E7 - Guildford Town Centre
I object that GBC do not accept the town centre as the perfect place for sustainable development. Internet shopping has changed the retail landscape so only limited new shops are required. Guildford will have ample opportunity to provide sustainable homes over the Local Plan period.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11271  Respondent: 15570209 / Emily Cross  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Policy E7 - Guildford Town Centre
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/11274  Respondent: 15570209 / Emily Cross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy E7 - Guildford Town Centre

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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: PSLPP16/15340  Respondent: 15570817 / Tom Edelsten  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher 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: PSLPP16/15338  Respondent: 15571201 / Zoe Dudgeon  Agent:
I OBJECT to Policy E7 Guildford Town Centre

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Comment ID: PSLPP16/11783  Respondent: 15571617 / Bruce Garbutt  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY E7 Guildford Town Centre

I object to this policy on the grounds of its weak and ineffective wording.

- The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be explicit in the statement of policy.
- There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development in, for example, several of the existing surface car parks which are not included in the Plan. Such town centre sites could meet much of the housing need over the Plan period without harming the countryside.
- There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.
- The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.
- The policy also fails to provide guidance on design requirements, as required by the NPPF.
- The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores, and ignores the trend towards increased on-line shopping from said chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers, making shopping in Guildford a unique rather than repetitive experience. Above all, the retail development proposals must not damage the viability and historic attractiveness of the High Street.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11596  Respondent: 15571937 / S Bennell  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12250  Respondent: 15581665 / Laura Daboo  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

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:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/12417</th>
<th>Respondent:</th>
<th>15583169 / Poul Jensen</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy E7</td>
<td></td>
<td></td>
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</tr>
</tbody>
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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:** PSLPP16/12771  **Respondent:** 15585601 / Sophie Corstin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. **POLICY H2**

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/13251  **Respondent:** 15588929 / Alex Hutchings  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
POLICY E7

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13397  Respondent: 15590273 / Eunja Madge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY E7

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13901  Respondent: 15598113 / David J. Blackbourn  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

but caution that Policy E7 “Guildford Town Centre” could lead to overdevelopment of the Town Centre.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14065  Respondent: 15601057 / Chris Vinall  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: PSLPP16/14170  Respondent: 15601185 / Jane Young  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7
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: PSLPP16/14169  Respondent: 15601217 / Patrick Barrass  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7
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**Attached documents:**

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**Comment ID:** PSLPP16/14168    **Respondent:** 15601249 / Ann Barrass    **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

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Attached documents:

Comment ID: PSLPP16/14268  Respondent: 15601953 / Stephen Yandle  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

• No statement in policy wording of value of Guildford’s rural setting and views.
• No consideration of Town Centre Master Plan, GVG proposals or station redevelopment plans.
• Proportion of new housing in town far too small. Development pushed into countryside, ruining the latter and harming urban regeneration.
• No brownfield register.
• Too much big retail, despite online shopping revolution and decline of traditional high streets internationally. Futile to try to turn Guildford into Woking or Kingston.

• No measures to support small, niche retailers in town, e.g. through business rates.

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Attached documents:

Comment ID: PSLPP16/16276  Respondent: 15603361 / Ann Watkins  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY E7 (TOWN CENTRE):
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Attached documents:

Comment ID: PSLPP16/14555  Respondent: 15603489 / Simon Pitt  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7
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:** PSLPP16/14683  **Respondent:** 15604449 / Annabel Curling  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

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**Comment ID:** PSLPP16/14818  **Respondent:** 15607553 / Penelope Gillmore  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

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**Comment ID:** PSLPP16/14880  **Respondent:** 15608289 / Olivia Marshall  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a
wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15073  Respondent: 15610081 / Sarah Kelly  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the expansion of commercial land in the urban area losing the potential for further housing. Policy E7: Guildford Town Centre

There is no reliable evidence provided that the retail core of the Town Centre can support expansion of 45,000 sq m of additional retail space at North Street.

Online retail is set to account for 21.5% of total retail sales by 2018 from 12.7% in 2013, the highest online retail share in the world according to the Centre for Retail Research. March 2016, online sales rose 12.3%, and it was the third consecutive month in which more than 20% of all non-food shopping took place online, (British Retail Consortium and accounting firm KPMG) With such a high retailers will need just 70 high street stores to create a national presence compared to 250 in the mid 2000’s. An expansion on such a scale is negligent when the Council claims to be in such desperate need for housing.

Retail is a declining industry and should not be invested in by the Borough at the expense of housing in the most sustainable urban location, near employment and transport hubs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15191  Respondent: 15610785 / Liz Vinall  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

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:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15337</th>
<th>Respondent: 15612481 / Gillian Culmer</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7</td>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am writing to object to the ridiculous expansion of shopping areas in Guildford at the expense of housing. There are empty shops everywhere because people are shopping on-line and the trend can only continue. Retailers will only need a fraction of their previous shop frontage and certainly not more.

Meanwhile proposed houses are being forced out into the green belt where everyone will need a car and add to the near stationary commuting conditions. Young people like me want to live in cities. Times are changing and the Guildford plan doesn't seem to have caught up.

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 E7 (TOWN CENTRE):
• No statement in policy wording of value of Guildford’s rural setting and views.
• No consideration of Town Centre Master Plan, GVG proposals or station redevelopment plans.
• Proportion of new housing in town far too small. Development pushed into countryside, ruining the latter and harming urban regeneration.
• No brownfield register.
• Too much big retail, despite online shopping revolution and decline of traditional high streets internationally. Futile to try to turn Guildford into Woking or Kingston.
• No measures to support small, niche retailers in town, e.g. through business rates.

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Attached documents:

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The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object that GBC do not accept the town centre as the perfect place for sustainable development. Internet shopping has changed the retail landscape and that will continue in the future so limited new shops are required, so sustainable housing and fewer shops should be provided for in the Local 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 E7 Guildford Town Centre

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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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Specific comments on policies and supporting text Policy E7

Page 85,

The third bullet point for Secondary Shopping Frontage change of use criteria will be difficult to adhere to. A development in itself that results in traffic generation is not a reason not to permit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15998  Respondent: 15629025 / Surrey County Council (Sir or madam)  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E7
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy E7

Guildford Town Centre Page 85

The third bullet point for Secondary Shopping Frontage change of use criteria will be difficult to adhere to. A development in itself that results in traffic generation is not a reason not to permit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16340  Respondent: 15640897 / Jackie van Heesewijk  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E7
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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• No statement in policy wording of value of Guildford’s rural setting and views. • No consideration of Town Centre Master Plan, GVG proposals or station redevelopment plans. • Proportion of new housing in town far too small. Development pushed into countryside, ruining the latter and harming urban regeneration. 4 • No brownfield register. • Too much big retail, despite online shopping revolution and decline of traditional high streets internationally. Futile to try to turn Guildford into Woking or Kingston. • No measures to support small, niche retailers in town, e.g. through business rates.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16773  Respondent: 15650369 / Stephanie Dean  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E7
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
POLICY E7 Guildford Town Centre

I object to this policy on the grounds of its weak and ineffective wording.

- The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force and possibly deliberately vague. These principles should be explicit in the statement of policy.
- There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development in, for example the Walnut Tree Close/Woodbridge Meadows area, where very significant numbers of new homes could be provided, and in several of the existing surface car parks which are not included in the Plan. Such town centre sites could meet much of the housing need over the Plan period without harming the countryside.
- There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.
- The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.
- The policy also fails to provide guidance on design requirements, as required by the NPPF.
- The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores, and ignores the trend towards increased on-line shopping from said chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers, making shopping in Guildford a unique rather than repetitive experience. Above all, the retail development proposals must not damage the viability and historic attractiveness of the High Street.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16880  Respondent: 15657057 / Frances Turner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY E7 TOWN CENTRE

I object to Policy E7 Guildford Town Centre. I am of the opinion that policy E7 is ill-informed and there is insufficient evidential support to objectively assess the capacity of the existing town centre to accommodate appropriate new development and therefore fails the requirements of Section 161 of the NPPF to assess the real quantitative and qualitative floor space needs.

There is no reliable evidence provided that the retail core of the Town Centre needs or can be expanded by 45,000 sq m of retail space at North Street because of lack of demand for retail units in the Town Centre particularly large units. This is due to falling demand for retail space in Guildford and town centres throughout the country evidenced by independent research and the reality of empty shops in many high streets (including Guildford) and the accelerating competition from internet shopping.

The failure of the North Street scheme to be redeveloped over the last ten years is a testament to lack of demand which has been so poor that the original planning permission for a large retail scheme became time expired.
The reality is that the town centre has enough retail floor space. If more is introduced it will result in the closure of existing shops particularly in locations which are less than 50% of peak Zone A or 100% positions. What Guildford needs is a new focus on specialty high quality comparison shopping supported by a revival of Guildford’s attractive heritage core and a new major visitor attraction supported by restaurants. Guildford needs to become the quality shopping destination for Surrey.

The existing site in North Street should be replaced with a well-designed ground floor high quality speciality retail mall and frontage of no more than 40 shops extending to 7,000 sq m with the rear and upper floors providing an additional 500 to 600 homes. The proportion of the above proposed smaller scheme at North Street will be complementary to and not antagonistic to the Upper High Street, Tungate, the Debenhams site and the 100% Zone A positions of the Lower High Street. If the existing policy under E7 is adopted the North Street site will remain empty for another 10 years.

The findings of the Guildford Retail and Leisure Study 25 September 2015 are very pessimistic about retail trends.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The centre of town does not need 40% more retail units. It should be developed to offer more homes so badly needed by both young and old. This combined with leisure offerings would bring life to the centre whilst at the same time contributing to the housing requirements.

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?
We object to the changes in Policy E7 Guildford Town Centre

We consider that policy E7 is still very ill-informed and there is insufficient evidence in support to objectively assess the capacity of the existing town centre to accommodate appropriate new development and therefore fails the requirements of Section 161 of the NPPF to assess the real quantitative and qualitative floor space needs. Policy E7 is still an aspirational voice from the past and is unlikely to benefit the health of the town centre in the future. There is no reliable evidence provided that the retail core of the Town Centre needs or can be expanded by 41,000 sq m of retail space at North Street because of lack of demand for retail units in the Town Centre particularly large units. This is due to falling demand for retail space in Guildford and town centres throughout the country evidenced by independent research and the reality of empty shops in many high streets (including Guildford) and the accelerating competition from internet shopping.

The recent Carter Jonas Study Retail Study 2017 update predicts total demand for Guildford Town Centre by 2020 at only 3,313 sq m and only 34,811 sq m by 2036. We have now been waiting some 15 years + for demand to catch up to enable development of North Street where the old consent for some 40,000 sq m of retail had to be renewed because it was getting out of date. Are we now going to have to wait till 2036 only another 19 years for demand to get to the point to enable development of this much prized site which developers have not exactly been falling over themselves to develop. That is also assuming that all retail demand in the Town Centre is wanting just this site. However optimistically and quite illogically they protest that “there still remains significant capacity to support new comparison goods floorspace over the plan period”. It’s a bit like saying in town x we have currently 100,000 m of shopping and the UK retail forecast done by Experian shows that we can predict a growth of 10% therefore this means we must have an additional 10,000 sq m in town x. This is unscientific guess work.

In table 2 Appendix 6 of their report we learn that there is a potential for turnover to reach £856.3m in the town centre by 2020 however actual committed floorspace take up accounts for only £1.3m of this. This is 0.15%. It is hardly surprising that there are no details of take up or real demand evidence given anywhere in the report. The Carter Jonas report is based on broad brush retail capacity forecasting derived from work by Experian which is very far from site or location specific and as a retail supply and demand assessment in my view is totally unreliable. The source is not even Guildford specific or even Surrey specific. The authors of the report do not disagree with my cynicism with capacity forecasting since they state up front that “It should be noted at the outset that capacity forecasts carried out over a long period of time are inherently less certain and should be treated with caution” and repeated again “at the outset we advise that all capacity forecasts beyond a five year period should be treated with caution. This is because long term trends in the economy, consumer demand and retail property market could have a significant impact on the potential capacity and need for new retail floorspace. For example, as discussed previously, a higher growth in nonstore retail sales (i.e. Internet sales) than forecast by Experian would reduce the capacity for new retail floorspace over time.” The Carter Jonas report is a vague whitewash report for a pre-conceived and outdated concept of increased retail development in the town centre. “For comparison goods, we have assumed the same estimations for convenience goods expenditure ‘inflow’ (10%) for Guildford Town Centre, again based on the centre’s role as a popular shopping and visitor destination.” Coming to the vague conclusion that Guildford is popular is far from reliable property market research.

The closest thing I can find to evidence of actual demand in this report is to read “In addition to focusing their attention on larger, dominant centres, many of the multiples and traditional high street retailers are changing their store formats and locational requirements. For example, key anchor retailers such as Boots, Next, Mothercare, TK Maxx, John Lewis and Marks & Spencer are actively seeking larger format units to showcase their full product range and to provide an exciting shopper environment backed by the latest (digital) technology.” But this statement applies to any of 100 centres in the UK. We are concerned as to whether the authors of this retail study have actually visited Guildford or know where it is? In their 2014/2015 reports Carter Jonas provided a fairly inaccurate picture of retail demand (originally Appendix 6) with
the inclusion of retailers who had either gone bust or actually specified demand requirements in centres other than Guildford. This I note has now been deleted presumably because of its inaccuracies which were dealt with in my 2016 objection and has not been updated. We are now left with no demand assessment from either small, medium sized or large retailers. This does not support the view that Guildford is a vibrant retail destination requiring expansion with a large retail development in North Street.

The reality is that the town centre has enough retail floor space. If more is introduced it will result in the closure of existing shops particularly in locations which are less than 50% of peak Zone A or 100% positions. What Guildford needs is a new focus on speciality high quality comparison shopping supported by a revival of Guildford’s attractive heritage core and a new major visitor attraction supported by restaurants. Guildford needs to become the quality shopping destination for Surrey. The existing site in North Street should be replaced with a well-designed ground floor high quality speciality retail mall and frontage of no more than 40 shops extending to 10,000 sq m with the rear and upper floors providing an additional 600 homes. The proportion of the above proposed smaller scheme at North Street will be complementary to and not antagonistic to the Upper High Street, Tunsgate, the Debenhams site and the 100% Zone A positions of the Lower High Street. If the existing policy under E7 is adopted the North Street site will remain empty for another 10 years. We also object to the continued failure of this policy to provide much needed substantial residential development in the Town Centre which is still only a modest target of 1,300 homes. Only approximately 10% of the total planned for the Borough.

There is still a blind overconcentration on retail expansion which fails to take account of market forces and a complete failure to grasp the reality that a residential expansion is required to stimulate retail/leisure demand in the Town Centre which is markedly losing out to nearby centres such as Woking which has a very different approach. See them Town Centre Opportunity in next section. We object to the deletion of the vision statement “Guildford town centre has a unique setting and historical character, and is at the centre of one of the most prosperous counties in England. We will protect and build on these assets and insist that all new development will be of the highest design and environmental standards. We will be proactive in building a great town centre which connects to the amenity of the riverside. We will invest in creating high quality public realm. We will put people above traffic and we will promote new high quality retail and business development. To achieve this we will develop innovative funding and delivery bodies. As we embark together towards this exciting future we pledge that we will continue and extend an active dialogue with our residents and other stakeholders.” Guildford Town Centre needs a decent vision. Without a vision the Town Centre is flying blind and it demonstrates the failure of the potential for imaginative Town development in this latest draft plan.

We support the deletion of paragraph 4.4.86 since many of the sites along the River Wey are capable of full development.

We object to the deletion of the Allies and Morrison Masterplan as a source document for the plan since although it failed to fully exploit the development potential of the Town Centre it did include many good ideas including more extensive brownfield development extending to 2,551 homes including Woodbridge Meadows as a residential development site.

We do not consider that the modest target of 1,300 homes in the town centre takes account of the need and demand for housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town which will in itself help to sustain the retail core by increased economic impact. What the town centre needs in terms of urban regeneration is much more residential development. As can be seen from the previous section, retail will not work!

The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015 which was originally adopted by GBC. The reality is that the Town Centre and other areas of brownfield in the borough has the capacity for at least 5,000/ 7,500 homes.

The additional target capacity of 5,000 could easily be provided within the following urban sites which have the capacity for 7,500 homes:
- 2,500 homes detailed in Masterplan 2015 including Woodbridge Meadows which can itself be increased substantially
- 500 homes at North Street
- 1,000 homes on current GBC car parks (25 acres) and at the station
- 1,000 homes saved in the urban area if 100% of students are accommodated on Surrey University campus (17 ha of
car parks)
- 1,000 homes at Slyfield on the 40 ha regeneration site
- 1,000 windfall infill (50 per annum)
- 500 homes on brownfield sites in villages on sites of max 1ha which do not impact Green Belt

Yes, we need a new Local Plan for our borough in order to provide a development strategy within which we can accommodate our local housing, economic and environmental needs. But first we must make 100% use of our urban brownfield in the town before we consider building in the Green Belt or countryside. Paragraph 80 of the NPPF clearly states that Green Belt serves a key purpose, “to assist in urban regeneration, by encouraging the recycling of derelict land and other urban land”. In order to comply with central planning policy we need a brownfield strategy that states clearly “We are committed to a brownfield first initiative” whereby all applications on previously developed land are given fast track priority and every facility to promote development for residential purposes and employment purposes in order to satisfy the needs of local people. In parallel a zero CIL incentive should be given for all residential development on brownfield land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/15565  Respondent: 15977889 / Charles Kimpton  Agent:  |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |

OBJECT. The town is well served by retail, its uniqueness and character should be supported.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: pslp171/1080  Respondent: 17320801 / Terence O'Rourke Ltd for M&G Real Estate (Andrew Elliott)  Agent: Terence O'Rourke for M&G Real Estate (Andrew Elliott) |
| Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E7 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( ) |

Reflecting M&G’s representations on the lack of flexibility in Site Allocation Policy A6, objection is made to Policy E7 (1) (a) which should be reworded to read:

a new retail-led mixed-use development of approximately 45,000 sq m (gross) of additional comparison good floorspace on the North Street regeneration site within its primary shopping area

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Policy E7 (1) (a) should be reworded to read:

a new retail-led mixed-use development of approximately 45,000 sq m (gross) of additional comparison good floorspace on the North Street regeneration site within its primary shopping area

Attached documents:
Q+A Planning Ltd act on behalf Aviva Investors in respect of White Lion Walk shopping centre in Guildford town centre.

Policy E7 concerns Guildford town centre. The quantitative need for retail floorspace in the comparison sector has reduced for the town centre from 45,000 sqm gross to 41,000 sqm gross to 2034. It should be noted that the figure relates to 2030 rather than 2034, as set out in paragraph 4.4.79.

We have no comment on the reason for the reduction in floorspace. However, the reduction in the quantitative floorspace need available and the way the policy is worded suggests that this should all go to the North Street regeneration site. However, we do not believe this is the intention as paragraph 4.4.81 only refers to the ‘vast majority of the retail floorspace’. Therefore, this should be clarified.

The need for additional retail floorspace is driven by total growth apportioned to the town centre, once deductions for special forms of trading, improved efficiencies and commitments are taken into account. Therefore, in circumstances where the whole of the town centre could have a claim on this growth, the policy should be sufficiently flexible to enable other sites to meet some of these needs through redevelopments, reconfigurations, minor alterations of extensions.

Therefore, we consider the policy does not reflect the requirement of paragraph 23 of the NPPF (sixth bullet) that requires local planning authorities to allocate a range of suitable sites to meet the scale and type of retail (and residential) development in town centres.

It is also noted that the distribution of homes to the town centre is increased from 1,172 to ‘approximately 1,300 new homes, particularly on upper floors as part of mixed use developments’. Consistent with the amendments to the Vision (which we have commented upon separately), this should be a minimum rather than an approximate figure.

The ninth bullet point of paragraph 23 of the NPPF makes it clear that local authorities recognise that residential development can play an important role in ensuring the vitality of centres and set out policies to encourage residential development on appropriate sites. Given the increase in the amount of residential development expected in the town centre, we do not consider that Policy E7 is sufficiently strong on its encouragement for appropriately located residential schemes within the town centre and suggest explicit support is given to this aim.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
3.44 The removal of the vision for Guildford town centre and replacement with more generic spatial vision for the borough fundamentally undermines the thrust of Policy E7 and is again indicative of the watering down of the 'town centre first' approach by GBC in meeting the development needs of the borough or aspirations of the community. It is recognised that GBC may not have the skills, resources or appetite to deliver major solutions but others have, and a quality Local Plan is an essential pre-requisite to delivery.

3.45 Later at 4.4.74, additional text has been added in reference to public realm which now states that:

We will ensure the public realm is enhanced and insist that all new development will be of the highest design and environmental standards. We will also take opportunities to reconnect the own centre to the amenity of the riverside.

3.46 This again highlights the piecemeal approach to development of the town centre which is being taken by GBC. If public realm is to be delivered to the highest quality then a coordinated approach is required, such as that demonstrated by the GVG Masterplan. The GVG Plan brings together the riverside with the pedestrian areas of the town centre through planned and connected cycle routes and footpaths along desire lines while removing the serious blight of traffic from pedestrian and activity concentrations.

3.47 Turning to policy E7 itself, text has been deleted from this policy which previously stated that by 2033 Guildford town centre will have:

- More varied uses during the evening and night time, including along the riverside with residents and visitors feeling safe;
- Active use of the riverside and river;
- More effective routes within and across the town centre for pedestrians and cyclists;
- New public squares and other informal meeting areas.

3.48 It is unclear why these elements of policy E7 have also been removed as GVG considers them to be vital in order to achieve successful regeneration of the town centre. No explanation has been offered by GBC as to why these have been excluded from the Plan and it is requested that these are reintroduced as part of policy E7.

3.49 The council in para 4.4.87 states that it will work with partners to deliver the Local Plan and to progress further opportunities within the Guildford Town Centre Regeneration Strategy. No such work has taken place with The Guildford Society, GVG, or Guildford Residents Association and accordingly the ambitions of the community have not been embraced.

3.50 In the Reasoned Justification section following the main policy text, further wording has been removed at para 4.486 which related to flooding. As set out previously within these representations, the issue of flooding within the town centre is a vital issue which requires a co-ordinated approach as advocated within the GVG Plan. It is therefore necessary to reintroduce this wording and strengthen it where necessary to reinforce the importance of flood solutions as part of the regeneration of the town centre.

3.51 The Allies and Morrison draft Town Centre Vision 2015 and draft Guildford Town Centre Masterplan 2015 have been removed from the Key Evidence supporting this policy with only the Guildford Town Centre Regeneration Strategy remaining in place. This document is considered by the council as having no planning status and can accordingly be ignored by developers. This demonstrates the lack of detailed vision or commitment towards the town centre issues and opportunities on behalf of GBC and highlights the robustness of approach taken by GVG in the vision for the wider area.

3.52 Having reviewed the Guildford Town Centre Regeneration Strategy, GVG consider it to be an inadequate document which is flawed on many levels. It fails to recognise or address the key issues on all infrastructure and highways. These require resolution as part of a successful regeneration of the town centre. GVG attributes little weight to the Town Centre Regeneration Strategy and considers that it does not provide an adequate evidence base on which to inform the strategic decisions for either GBC or developers across the lifetime of the emerging Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Guildford has an active economy which provides a range of cultural, social and entertainment facilities for both day and evening use to serve the people living in the surrounding area. Surrey Police recognises the importance and economic benefits of expanding the evening/night time-time economy. Ensuring the night time economy is well managed and controlled through effective planning is an essential to ensure crime and incidents of anti-social behaviour are minimised.

Surrey Police recommend that the evening/night-time economy should be subject to a new specific planning policy with the Local Plan. In order to be constructive, we have set out below our suggested wording for a policy that would resolve our concerns and ensure the Local Plan is sound in relation to planning for this type of development:

‘Policy ?? – The Evening and Night-time Economy

The Council will welcome development that create safe, balanced and socially responsible evening and night time leisure in the Borough. An enriched mix of uses will be encouraged to achieve this including late-night shopping, cultural and theatrical activities, cafes, restaurants, pubs and bars.

Developments linked to the evening and night-time economy will be required to implement safeguards by contributing towards public realm, public transport and other infrastructure improvements to deliver a sense of well being, safe and security. This will involve ensuring activity is facilitated during the daytime to avoid the clustering of ‘dead’ frontages.

Working in partnership with the Council and other stakeholders, owners and operators of evening and night-time economy related development will be expected to take part in active management measures to help the public and support the emergency services.

If the above is achieved no development on its own, or cumulatively with other uses, will create an unacceptable impact on neighbouring uses, residents or the surrounding area by reason of noise and pollution, light pollution, anti-social behaviour, crime, disturbance or traffic. In necessary planning conditions and legal agreement will be implemented to ensure this.’

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

Document part: Policy E8 - District Centres
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

Comment ID: pslp171/1858  Respondent: 8561377 / The Guildford Society (Julian Lyon)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY E8 – District Centres

III) The Guildford Society has no comment to make on the amendments to Policy E8 except to note the introduction of ‘Main town centre uses’ and to question whether these should not also have similar relevance to Policy E7. We wonder also why the marketing approach in Policy E9 is not also relevant to Policy E8.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17444  Respondent: 8563201 / West Horsley Parish Council (Sam Pinder)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

E8 - District and Local Centres

Report page: 16

WHPC view: Neutral with comment

In brief: The 2 Horsley Centres have no room for expansion and are already overloaded in terms of parking cars

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17494  Respondent: 8563201 / West Horsley Parish Council (Sam Pinder)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY E8: District centres and POLICY E9: Local centres

WHPC notes EHPC supports these 2 policies, which include the designation of Station Parade, East Horsley, as a District Centre and the designation of Bishopsmead Parade, East Horsley as a rural Centre under the draft Local Plan. It is observed that there is virtually no room for expansion of the mix of retail units, post offices / newsagents, estate agency, charity shops, restaurants and café facilities at each location. Parking of cars becomes more and more difficult each week and is likely to become near impossible if even a proportion of the proposed housing is built.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/4320  Respondent: 8566145 / Mrs Diana Brighton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Station Parade East Horsley being designated a District Centre because this misunderstands the facilities provided here. For example, the grocery stores do not have the full range of groceries and vegetables that the usual household will require. I have to travel to Ripley for a green grocer’s, shop at Sainsbury’s and also have to go to Guildford for the many items that are not available in the Horleys eg paint and hardware, clothes and shoes, dress fabrics and knitting wools.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2371  Respondent: 8570273 / Fiona Curtis  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

E8 District Centres

(4) retail impact assessment.

The addition of the word retail removes all other impact. It is essential in my view that a traffic and transport assessment be included

Object

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13048  Respondent: 8573793 / Harry Eve  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

77. I object to the designation of Station Parade, East Horsley as a District Centre as this is based on an incorrect assessment of the facilities in the village centre. This would result in appropriate development in East Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/7013  Respondent: 8575617 / Effingham Parish Council (Ian Symes)  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

E8 Economy – District Centres

Support

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17562  Respondent: 8581505 / Burpham Neighbourhood Forum (Jim Allen)  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

No comment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13956  Respondent: 8581601 / Mr James Winborn  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Station Parade, East Horsley is to be designated a Rural Development Centre

which opens the possibility of substantial and out-of-character development. The

Parade is made up entirely of small businesses apart from Budgens supermarket

which in any event is small enough to count as premises not restricted in terms of

Sunday opening hours ie East Horsley is a village and not an embryo small town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11205  Respondent: 8602337 / Cross Group (Mr Colin Cross)  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Policy E8 - District Centres

I object to rural villages becoming District Centres when they are already viable and sustainable local centres. District Centres are preparing the infrastructure for large scale development and ignore the wishes of residents in those local centres.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1263  Respondent: 8608865 / WBDRA. (David Bird)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

WBDRA SUPPORTS this policy

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9852  Respondent: 8627393 / Worplesdon Parish Council (Gaynor White)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

E8 District Centres Support.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10087  Respondent: 8640353 / Julian Cranwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We object to policy E8 District centres. We object to the proposal that sites “on the edge” of District Centres should be considered for retail developments. This is another Trojan horse policy, allowing retail hubs to be vastly expanded in order to smooth the way for vast new housing estates outside in the countryside (e.g. to meet the “everyday shopping and service needs” of the roughly 1,500 people living in the 600 new homes planned for the Horsleys). This is a case of back-to-front priorities. Expanded local retail hubs are being proposed in order to justify more housebuilding in the villages, and in a forlorn attempt to mitigate the serious traffic and infrastructure problems this will bring. The Council have no business preparing the way for new supermarkets in the Green Belt. Rural retail capacity should be left to local
demand. The policy proposes not a single measure to support existing rural shops and services that are the lifeblood of village communities, e.g. using business rates and other levers at the Council’s disposal.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/1660  **Respondent:** 8659489 / Helen Bennett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Station Parade in East Horsley cannot be considered a District Centre. It is a small collection of shops and food outlets. It should not be considered an urban centre but a village centre.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/15394  **Respondent:** 8668993 / Christopher Noon  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am in addition concerned with how definitions within the report have been made. For example, Horsley Village’s “Station Parade” is described as a “District Centre” which is used to support the case for a very large number of new houses in the vicinity. At present local provision for food, education, as well as the roads themselves are either appropriate for the current population, or in some cases, inadequate. The proposals in the local plan would turn the Horsley’s into a single town with roads, schools and healthcare designed for Village life.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/2319  **Respondent:** 8671969 / Valerie Thompson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

E8/E9 District Centres

I object to the idea that sites on the edge of District Centres should be developed further with retail opportunities. There is a proposal to increase the number of shops at East Horsley for the use of the 600+ houses planned for West and East Horsley. It is in West Horsley that we need a few shops, the GBC having given permission for the PO to be turned into flats. The general stores is also shortly closing, leaving West Horsley with NO shop at all. Part of the Bell and Colville site, should have been proposed for a small general store, chemist and PO.
However, the increase in shops in East Horsley will exacerbate the problem, already there, of insufficient parking places, and nowhere to create more. There will also be increased traffic on already narrow and crowded roads, impossible to use during school-run time.

GBC should reduce rates for existing shops to allow them to flourish.

GBC is encouraging urbanisation of rural communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/1081  **Respondent:** 8687265 / Dagero Ltd (David Roberts)  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**POLICY E8 - District centres**

I OBJECT to the proposal that sites “on the edge” of District Centres should be considered for retail developments. This is another Trojan horse policy, allowing retail hubs to be vastly expanded in order to smooth the way for vast new housing estates outside in the countryside (e.g. to meet the “everyday shopping and service needs” of the roughly 1,500 people living in the 600 new homes planned for the Horsleys).

This is a case of back-to-front priorities. Expanded local retail hubs are being proposed in order to justify more housebuilding in the villages, and in a forlorn attempt to mitigate the serious traffic and infrastructure problems this will bring. The Council have no business preparing the way for new supermarkets in the Green Belt. Rural retail capacity should be left to local demand.

The policy proposes not a single measure to support existing rural shops and services that are the lifeblood of village communities, e.g. using business rates and other levers at the Council’s disposal.

1. **NPPF 59:** “Local planning authorities should consider… the overall scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/2632  **Respondent:** 8693153 / Vicki Willetts  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY E8 (DISTRICT CENTRES): • Too much scope to expand rural retail centres to justify major housing expansion across the countryside, despite lack of demand. Will spoil character of villages while harming Guildford’s role as a retail hub. • No measures to support existing rural shops and services, e.g. through business rates.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Policy S2 of the local plan specifically relates to the spatial development strategy; an additional clause should be inserted requiring development to respect the character and appearance of existing settlements. 4.1.6 states the preference is to focus growth making use of previously developed land. The proposed development locations in the village of West Horsley suggest a significant increase in the size of village, with limited use of previously developed land. The impact of these developments can be clearly seen on pg 346. These sites do not comply with 4.1.6

Table 2 suggests that Station Parade, East Horsley is a Rural District Centre. Whilst the station parade contains limited shopping facilities the number of units is significantly smaller than a number of the local centres listed. This classification should be reconsidered. Whilst there are 3 parades of small shops spread between 2 distinct villages, this does not constitute designation as a district shopping centre either. Local residents are most likely to travel by car, to Cobham, Ripley or Guildford town centre to fulfil needs. Increasing the number of residents in this area will increase the substantially the number of car journeys.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

As stated above the inclusion of Station Parade East Horsley as a District Centre does not accord with its usage and capacity. There are a few small shops and residents rely on the neighboring centres of Ripley, Cobham and Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I OBJECT TO POLICY E8 (DISTRICT CENTRES):

- Too much scope to expand rural retail centres in order to justify major housing expansion across the countryside, despite lack of existing demand. This will spoil the character of villages while further harming Guildford’s role as a retail hub.
- No measures to support existing rural shops and services, e.g. through business rates.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11638  Respondent: 8721857 / Andrea Lightfoot  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E8
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

To the proposal that sites on the edge of District Centres should be considered for retail developments allowing retail hubs to be vastly expanded in order to smooth the way for vast new housing estates outside in the countryside.

The Council should not be preparing the way for new supermarkets in the Green Belt, supermarkets are closing due to deliveries. Rural retail capacity should be left to local demand.

The policy proposes not a single measure to support existing rural shops and services that are the lifeblood of village communities, e.g. using business rates and other levers at the Council’s disposal.

NPPF 59: “Local planning authorities should consider... the overall scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9066  Respondent: 8723809 / Sally Blake  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E8
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to POLICY E8 - District centres

• Too much scope to expand rural retail centres to justify major housing expansion across the countryside, despite lack of demand. Will spoil character of villages while harming Guildford’s role as a retail hub.
• No measures to support existing rural shops and services, e.g. through business rates.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16900  Respondent: 8728865 / Neville Bryan  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E8
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

No comment
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4446  Respondent: 8734241 / Andrew Ingham  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the proposed designation of East Horsley as a "district centre". This completely misreads the nature of the facilities currently provided and will make it a target for future inappropriate developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4274  Respondent: 8804417 / Vivian and Philip Markley  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. Station parade designation as a "District Centre"

The proposed classification is based on a false and misleading interpretation of the facilities in the village centre.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2364  Respondent: 8806305 / Laurence Cook  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY E8 - District centres

I OBJECT to the proposal that sites “on the edge” of District Centres should be considered for retail developments. This is another Trojan horse policy, allowing retail hubs to be vastly expanded in order to smooth the way for vast new housing estates outside in the countryside (e.g. to meet the “everyday shopping and service needs” of the roughly 1,500 people living in the 600 new homes planned for the Horsleys).

This is a case of back-to-front priorities. Expanded local retail hubs are being proposed in order to justify more housebuilding in the villages, and in a forlorn attempt to mitigate the serious traffic and infrastructure problems this will bring. The Council have no business preparing the way for new supermarkets in the Green Belt. Rural retail capacity should be left to local demand.
The policy proposes not a single measure to support existing rural shops and services that are the lifeblood of village communities, e.g. using business rates and other levers at the Council’s disposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16582  Respondent: 8813281 / P J Ryan   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Station Parade is designated as a “District Centre”. A visit to this Parade of shops will immediately show the facilities available fall well below those required for such a classification and totally fall short of those required for future Urban development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6769  Respondent: 8826145 / William Hewlett   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

4. Comments relating to Villages and Major Previously Developed Sites, Policies E8 (District Centres) and E9 (Local Centres), and Policy I3: Sustainable Transport for New Developments

I OBJECT to the Plan’s approach of applying the same evaluation criteria for all villages, and the combining of part of West Horsley with East Horsley – when West Horsley is clearly an independent small village – is inappropriate:

For West Horsley, there are errors and inappropriate assumption in these sections of the Plan, particularly with respect to infrastructure; the access to, and availability of, local facilities; and sustainability. In particular:

- West Horsley is wrongly classified as two villages, West Horsley South and West Horsley North. The Defined Settlement Area boundaries do not need to be extended, and no “exceptional circumstances” or justification have been presented for insetting these areas from the Green Belt.
- With only a very limited bus service, on weekdays only, and only one shop and no post office, expansion of the village is unsustainable, and it cannot accept significant numbers of new housing development. More details are needed for the possible infrastructure improvements listed in documents LRN22 and BT2.
- There is already only very limited parking, particularly for the one small grocers’ shop at the southern end of the village, and the proposed significant increase in population will make parking in the village even more difficult.
- Even developing one site to its declared potential based on target housing density would have a significant effect on the village services and character; development of all sites would significantly increase the number of homes in West Horsley and could double the population.

The sites identified in the Plan for development in West Horsley are currently described as agricultural land and once lost that land cannot be reclaimed. The sites are important for wildlife, and the open character of the village, with some being close to areas designated as SSSI, SPA or SNCI. Those in the lower lying areas have a very high water table and
development of that land will impact on the drainage of surrounding property in wet weather and water retention in times of drought – conditions which the consultation expects to become more challenging.

Each of the sites has its own character and needs, and each should be evaluated on an individual, case-by-case basis. For example, the land near Waterloo Farm, to the north of West Horsley (potential development site A40) is partly within Flood Zones 2 and 3 (medium and high risk). The surface is frequently flooded in that area, and it is not suitable for development.

For both East and West Horsley, the areas identified for potential development, with expansion on Green Belt land and beyond agreed settlement areas, are disproportionately large, and other available land, such as that owned by the developer Dandara, alongside the Epsom Road (A246) in West Horsley have not been considered.

In East Horsley, Station Parade has been inappropriately designated as a “Rural District Centre”, apparently partly because it has a “large supermarket”. This must refer to Budgens, which is not large, and in fact under the Sunday Trading Act 1994 is classified as a small shop or convenience store.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3126  Respondent: 8826177 / Charles Spence  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E8  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy E8 proposes development of district centres. I agree with this in principle. However, I object to this being done with no consideration of infrastructure consequences (eg parking and transport). The policies seem to be developed in isolation and ignore their combined impact – for example adding so much new housing and new shops in Horsley and nearby Wisley and Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16589  Respondent: 8832513 / Richard Russell  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E8  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Inexplicably, the new Draft Local Plan (which provides for 5000 new homes within a 5-mile radius of the Horsleys) has designated Station Parade, East Horsley, as a ‘District Centre’ which demonstrates a complete and utter misreading of the area because there are but a handful of local shops of which some have flats above. Such a designation / classification would merely encourage future urban development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15774  Respondent: 8836129 / Roger Shapley  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E8  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Inexplicably, the new Draft Local Plan (which provides for 5000 new homes within a 5-mile radius of the Horsleys) has designated Station Parade, East Horsley, as a ‘District Centre’ which demonstrates a complete and utter misreading of the area because there are but a handful of local shops of which some have flats above. Such a designation / classification would merely encourage future urban development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Expanding local retail hubs are being proposed in order to justify more housebuilding in the villages, and in an attempt to mitigate the serious traffic and infrastructure problems this will bring. We think it is appropriate that these district centres should support development consistent with the scale and function of the local centre. We think it is appropriate to refuse planning applications for main town centre uses over 100 sq m outside District Centres – although this policy could and should be more clearly articulated. We do not support consideration of sites on the edge of district centres for town centre uses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
the villages, and in a forlorn attempt to mitigate the serious traffic and infrastructure problems this will bring. The Council have no business preparing the way for new supermarkets in the Green Belt. Rural retail capacity should be left to local demand. The policy proposes not a single measure to support existing rural shops and services that are the lifeblood of village communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7453  Respondent: 8854305 / A_P Latham  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Station Parade is designated as a "District Centre". This classification results from a complete misreading of the nature of the facilities in the village centre and result in the area being targeted for future urban development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17785  Respondent: 8858113 / Ramsey Nagaty  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to policy E8 District centres

I object to the proposal that sites “on the edge” of District Centres should be considered for retail developments. This is another Trojan horse policy, allowing retail hubs to be vastly expanded in order to smooth the way for vast new housing estates outside in the countryside (e.g. to meet the “everyday shopping and service needs” of the roughly 1,500 people living in the 600 new homes planned for the Horsleys).

This is a case of back-to-front priorities. Expanded local retail hubs are being proposed in order to justify more housebuilding in the villages, and in a forlorn attempt to mitigate the serious traffic and infrastructure problems this will bring. The Council have no business preparing the way for new supermarkets in the Green Belt. Rural retail capacity should be left to local demand.

The policy proposes not a single measure to support existing rural shops and services that are the lifeblood of village communities, e.g. using business rates and other levers at the Council’s disposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2431  Respondent: 8858433 / Eric Peters  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8
I object to the proposal that sites “on the edge” of District Centres being considered for retail developments. This is another Trojan horse policy, allowing retail hubs to be vastly expanded in order to smooth the way for vast new housing estates outside in the countryside (e.g. to meet the “everyday shopping and service needs” of the roughly 1,500 people living in the 600 new homes planned for the Horsleys).

This is a case of back-to-front priorities. Expanded local retail hubs are being proposed in order to justify more house building in the villages, and in a forlorn attempt to mitigate the serious traffic and infrastructure problems this will create. The Council has no business facilitating new supermarkets in the Green Belt. Rural retail capacity should be left to local demand.

The policy proposes not a single measure to support existing rural shops and services that are the lifeblood of village communities, e.g. using business rates and other levers at the Council’s disposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
If 'Station Parade' is designated a 'District Centre' it would have an adverse effect on the village centre and would target the area for future development.

I sincerely hope that these objections will be seriously considered

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17622  Respondent:  8865697 / Robert Treble  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E8
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

East Horsley village shopping area, I note that the designation of the village shopping area of East Horsley has now changed to a District Centre. This designation completely misunderstands the arrangement of small rural shops. It should also be noted that there is already insufficient room for sustainable development due to the restraint by the surroundings, for example railway and housing. The mistake in designating East Horsley as a District Centre is that it does not give a holistic view of Surrey and its adjoining facilities, such as Cobham (outside the GBC boundary). This is in practicality is the District Centre for the Horsleys, where an extensive range of services are available, including two large supermarkets and branches of 4 different banks, compared to the Horsleys single mini-supermarket and one remaining bank.

I object to the proposed change to the Designation of East Horsley as a 'District Centre'.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1689  Respondent:  8865697 / Robert Treble  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy E8
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Although not objecting in total to these policies concerning District Centres and rural Local Centres, I have specific concerns. I object to the inclusion of the phrases "and other main town centre use" where it appears in both policies.

The definition of main town centre uses within these policy sections (paras. 4.4.87b and 4.4.92a) include an extremely wide ranging selection of activities, some of which are totally inappropriate to locations such as Station Parade and Bishopmead Parade, East Horsley. Examples include factory outlet centres, casinos, drive-through restaurants and night clubs. The fact that these uses will be "supported" by Policies E8 and E9 is a concern.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8388  Respondent:  8878241 / Janet O'Hara  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E8
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
**Infrastructure and Sustainability:**

- The Station Parade group of shops in East Horsley, which is also used by most residents of West Horsley, is designated a “District Centre” in the Local Plan, which is a classification that results from a complete misunderstanding of what these facilities are and how they are used by the local population. The shops are already fully utilised and car parking is at a maximum. Such an incorrect reference means the area is likely to be inappropriately targeted for future urban developments, where no opportunity exists.

**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: PSLPP16/4784</th>
<th>Respondent: 8888289 / Hazel Jones</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8</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 designation of Station Road, East Horsley as a ‘Dist.net Centre’. It is a rural village with narrow roads and shop premises regularly having to change ownership. It is not a township. Further businesses and warehouses are not needed or wanted.</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>
<th>Comment ID: PSLPP16/16590</th>
<th>Respondent: 8892353 / Elizabeth Russell</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8</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>
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<td>Inexplicably, the new Draft Local Plan (which provides for 5000 new homes within a 5-mile radius of the Horsleys) has designated Station Parade, East Horsley, as a ‘District Centre’ which demonstrates a complete and utter misreading of the area because there are but a handful of local shops of which some have flats above. Such a designation / classification would merely encourage future urban development.</td>
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<table>
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<tr>
<th>Comment ID: PSLPP16/16977</th>
<th>Respondent: 8893057 / Dianne Garnett</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>1.1 We object to policy E8 District centres</td>
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</tbody>
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1.2 We object to the proposal that sites “on the edge” of District Centres should be considered for retail developments. This is another Trojan horse policy, allowing retail hubs to be vastly expanded in order to smooth the way for vast new housing estates outside in the countryside (e.g. to meet the “everyday shopping and service needs” of the roughly 1,500 people living in the 600 new homes planned for the Horsleys). 1.3 This is a case of back-to-front priorities. Expanded local retail hubs are being proposed in order to justify more housebuilding in the villages, and in a forlorn attempt to mitigate the serious traffic and infrastructure problems this will bring. The Council have no business preparing the way for new supermarkets in the Green Belt. Rural retail capacity should be left to local demand.

1.4 The policy proposes not a single measure to support existing rural shops and services that are the lifeblood of village communities, e.g. using business rates and other levers at the Council’s disposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
g) Our local representatives are exercised by the decision to designate East Horsley Station Parade shops as a “District Centre”. This means little to the uninitiated (me) but it sounds as if this is a further underhand method to change the status of an area with, as always, the objective of weakening the resistance to undesirable development and further urbanisation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8160  Respondent: 8902465 / Linda Slater  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY E8 (DISTRICT CENTRES):

- Too much scope to expand rural retail centres to justify major housing expansion across the countryside, despite lack of demand. Will spoil character of villages while harming Guildford’s role as a retail hub.
- No measures to support existing rural shops and services, e.g. through business rates.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5808  Respondent: 8907713 / S.J. Gilbert  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. **Station Parade** is a small row of shops, ie a chemist, butchers, small supermarket, post office, hairdressers, a bank, estate agent and charity shop all with flats over them and this could not possibly be considered for future urban developments. Apart from anything else THERE IS NO SPACE.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16668  Respondent: 8907713 / S.J. Gilbert  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Station Parade** is a small row of shops, ie a chemist, butchers, small supermarket, post office, hairdressers, a bank, estate agent and charity shop all with flats over them and this could not possibly be considered for future urban developments. Apart from anything else THERE IS NO SPACE.
Designation of East Horsley as a District Shopping Centre

The Local Plan designates East Horsley as a “District Shopping Centre”. The reality is that East Horsley is a small collection of shops (convenience store, hairdresser, butcher, bank, pharmacy) typical of a medium sized village centre. The facilities are not in any way those of a main town centre, or urban area, from the perspective of either retail (there is no supermarket), leisure, office or arts/culture facilities. I object to East Horsley being designated as a District Shopping Centre – it should be classified as a Local Centre.

Furthermore the local facilities and infrastructure would be completely overwhelmed by the scale of the proposed developments in East Horsley, West Horsley and the former Wisley airfield site. In particular the road infrastructure, East Horsley shops, health services, schooling and train transport – many of these are already stretched and in some cases inadequate for the current residential community. I see no suitable sustainable proposals on supporting infrastructure investment outlined in the Local Plan to justify the proposed level of development and therefore object to these proposed developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

The designation of East Horsley Station Parade as a District Centre is clearly an error of judgement as it would open it to wholly inappropriate forms of development for a village centre.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to Policy E8 and E9 putting new Local Centres in rural areas. It is not sustainable. We are surrounded by retail we can have products and food delivered to our doorsteps, we do not need more. The Plan is only using Local Centres as
an excuse to build large numbers of homes on Green Belt. This is inappropriate development and does not follow the core principles of the NPPF. Existing Local centres are struggling because people shop for what they need on the way home from work, during lunch breaks or use internet shopping. Even our major supermarkets are struggling and the convenience store market is rapidly become saturated as major stores jump on the band wagon.

In Normandy and Flexford we originally had 5 shops and two pubs. They closed because they were not economically viable. We had mobile vans knocking on doors or parked in locations around the village. Again they were not economically viable. How many times do you drive past brown signs with Local Shops pointing into estates. This suggests Local Shops need passing trade to survive. Local Centres are not viable they are struggling in an over saturated market.

GBC’s housing targets have not been scrutinised or evaluated because they do not hold the model on which they are based. The Brexit result has not been taken into account and will have an effect on growth forecasts.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/16576  **Respondent:** 8917377 / Nick and Fiona Hardman  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We find it incredible that Station Parade has been designated a “District Centre”. One wonders whether the person responsible for drafting this comment has actually ever set foot within the Horsleys? Station Parade is simply a parade of local shops within a village, comprising services valuable to local residents. It is hardly a “District Centre” attracting people from surrounding villages. It is non-sensical to suggest that this is the case, and one wonders whether GBC have used this terminology simply to justify over development and urbanisation of our villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/10614  **Respondent:** 8917793 / Alan Pickup  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

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 designate Station Parade as a ‘District Centre’. In my comments on the earlier Draft Local Plan I mentioned that it was hard to avoid the conclusion that the writer had never visited East Horsley. I see no reason to change this view. The proposed reclassification results from a complete misunderstanding of the nature of the facilities in the village centre and would inappropriately target the area for future urban developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/3530   Respondent: 8919521 / Susan Hughes   Agent: 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ) , is Sound? ( ) , is Legally Compliant? ( ) 

POLICY E8 District centres OBJECT. I do NOT support consideration of sites on the edge of district centres for town centre uses. Increasing retail developments "on the edge" of District Centres then gives an argument to the Council for more housebuilding, i.e. the shopping comes first and the housing follows.

What changes (2016)/further amendments (2017) do you suggest should be made to the document? 

Attached documents: 

Comment ID: PSLPP16/12641   Respondent: 8923969 / Stephen Newt   Agent: 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ) , is Sound? ( ) , is Legally Compliant? ( ) 

Policy E8 Any development proposed under this title will have to be outside the current business area which will result in another reason for further development of the area. It would fundamentally change the character of the village with a centre of shops, business buildings and houses intermingled. Garlick's Arch is proposed both under E8 and for housing development. In effect this would create a single large interconnected sprawl between Ripley, Burnt Common, West Clandon and Send. Add a development on Wisley Airfield and a major destruction of Green Belt between Cobham and Guildford will have been completed in one Plan. This is the major trunk route from London to central southern England. To prevent this was the main purpose of the Green Belt. 

What changes (2016)/further amendments (2017) do you suggest should be made to the document? 

Attached documents: 

Comment ID: PSLPP16/15151   Respondent: 8926529 / Annie Cross   Agent: 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ) , is Sound? ( ) , is Legally Compliant? ( ) 

Policy E8 - District Centres

I object to rural villages becoming District Centres when they are already viable and sustainable local centres. District Centres are preparing the infrastructure for large development and ignore the wishes of residents in those local centres.

What changes (2016)/further amendments (2017) do you suggest should be made to the document? 

Attached documents: 

Comment ID: PSLPP16/15726   Respondent: 8927841 / Tom Bomford   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? ( )

I object to Station Parade being designated a “District Centre”

This ‘designation' results from a misreading of the nature of the facilities in the village centre and would target the area inappropriately for future urban developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/69  Respondent: 8929057 / East Horsley Parish Council (Nick Clemens)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY E8: District centres

We support this policy, including the designation of Station Parade, East Horsley, as a District Centre under the draft 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: PSLPP16/8781  Respondent: 8933185 / Peter See  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Page 88 Policy E8: District Centres

'the Primary Shopping Area is the boundary of that Centre'

Note: This makes no sense. Please change to be more like Policy E9:

'the Primary Shopping Area (the area where retail development is concentrated) forms the boundary of that centre'

that centre: centres

outside of: outside

4.4.90

is the boundary : forms the boundary

Page 89 Monitoring Indicators
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13276  Respondent: 8933953 / Stephanie Billington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

For East Horsley to be listed as a district centre in the settlement hierarchy is still a distortion of ordinary language, which is being done to make it easier to push development on to the village. People go to Guildford for their shopping, etc and not to East Horsley which struggles to keep shop premises occupied and is oversupplied with non-commercial charity shops and estate agents. In following the tick list exercise in more background documents, your agents seem to have lost sight of reality. I do not agree with the settlement hierarchy and I object to this policy which would allow for sites on the edge of so-called district centres to be considered for retail developments. These are more appropriate in urban areas, but please note my comments on changing retail habits.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16052  Respondent: 8941761 / FLGCA (Paul Kassell)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9379  Respondent: 8948385 / Gillian Eve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy E8: District Centres

I OBJECT to the designation of the existing shopping parades in 3 villages being designated as District Centres. Village shopping parades should serve the needs of the local residents. More extensive shopping facilities are available in Guildford Town centre, and this is where they should remain.
I OBJECT in particular to Station Parade, East Horsley, being designated a District Centre. This is a small-scale retail centre meeting the needs of the local village population and further retail development would encourage the use of this centre by residents outside the villages, with its consequent adverse impact on road use and parking.

I OBJECT to the plan to encourage further retail development on the existing retail centre or on sites on the edge of this centre. I reiterate that this is a village and the shops serve local needs. This should continue to be the case in future. Further development at this centre or on the edge of this centre would turn the village into a town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16166  Respondent: 8948385 / Gillian Eve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the designation of the existing shopping parades in 3 villages being designated as District Centres. Village shopping parades should serve the needs of the local residents. More extensive shopping facilities are available in Guildford Town centre, and this is where they should remain.

I OBJECT in particular to Station Parade, East Horsley, being designated a District Centre. This is a small-scale retail centre meeting the needs of the local village population and further retail development would encourage the use of this centre by residents outside the villages, with its consequent adverse impact on road use and parking.

I OBJECT to the plan to encourage further retail development on the existing retail centre or on sites on the edge of this centre. I reiterate that this is a village and the shops serve local needs. This should continue to be the case in future. Further development at this centre or on the edge of this centre would turn the village into a town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6464  Respondent: 8957409 / Horsley Countryside Preservation Society (Roy Proctor)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We previously commented on your designation of East Horsley as a Rural District Centre in the draft Local Plan. We note that the designation has now changed to a District Centre and we repeat our objection to this on the grounds that the designation completely misreads the situation. The direction of main town centre uses towards the village, as a District Centre, would not only be inappropriate and unsustainable, but would be physically impossible to introduce. It should also be noted that there is already insufficient parking in the village for those using the local amenities, and there is no available space to alleviate this. The error in designating East Horsley as a District Centre is compounded by the fact that Cobham, which is in close proximity but outside the GBC boundary, is in reality the District Centre for the Horsleys and vicinity. The reason for this is the much more extensive range of services available, including two large supermarkets and branches of 4 different banks, compared to the Horsleys where there is no large supermarket and only one bank.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Policy E8 & Policy E9

Although not objecting in total to these policies concerning District Centres and rural Local Centres, we have specific concerns. We object to the inclusion of the phrases "and other main town centre use" where it appears in both policies.

The definition of main town centre uses within these policy sections (paras. 4.4.87b and 4.4.92a) include an extremely wide ranging selection of activities, some of which are totally inappropriate to locations such as Station Parade and Bishopmead Parade, East Horsley. Examples include factory outlet centres, casinos, drive-through restaurants and night clubs. The fact that these uses will be "supported" by Policies E8 and E9 is a concern. The designation "retail and other main town centre uses" replaces the previous wording which simply said "retail development". The term "consistent with the scale and function of that centre" is insufficient protection against inappropriate development and the reference to "other main town centre uses" and the supporting definition of these uses should be removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8678  Respondent: 9050337 / Nigel Geary  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E8
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I support this policy, including the designation of Station Parade, East Horsley, as a District Centre under the draft Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
POLICY E8 District centres

PART SUPPORT, PART OBJECT We think it is appropriate that these three district centres should support development consistent with the scale and function of the local centre. I think it is appropriate not to approve planning applications for main town centre uses over 100 sq m outside district centres – although this policy could and should be more clearly articulated. I do NOT support consideration of sites on the edge of district centres for town centre uses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Policies E8/ E9: District & Local Centres

Object (not justified in respect of NPPF paragraph 182)

The Local Plan is unjustified on the basis of the proposed restriction on food takeaways (A5 uses) within 500m of schools. This is unsupported by appropriate evidence and not a reasonable material planning consideration. There does not appear to be any evidence base to support this, and no explanation is included within the reasoned justification. The same policy provision is also included within Policy E7 with respect to Guildford Town Centre, again without justification.

To place the policy into a practical context, at the Wisley new settlement, the Concept Masterplan (Appendix 2) includes a local centre (which may include A5 uses) adjacent to the proposed primary and secondary school site. There are design, transport and sustainability reasons to support this co-location. As read, this proposal would be in conflict with emerging policies E8 and E9. Indeed, it is best practice to provide critical mass at local centres to not only create a sustainable place but also to make the proposals viable.
Village Facilities

West Horsley has only two small shops at the southern end of the village, with limited parking. People using East Horsley’s shops and Library have difficulty in parking at most times of the day. Any increase in the local population will make parking and movement in the village more difficult. It can definitely not be described as a “District Centre.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17264  Respondent: 9228769 / Cathryn Fleming  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Horsley Station Parade has been designated a District Centre

The attempt to classify the small station parade as a district centre is beyond laughable. It meets virtually none of the requirements. It is not a district centre. There is only one small convenience store and a pharmacy and post office plus charity shops and a cafe. This is not the definition. It indicates that no one from the group that prepared this plans has remotely interviewed or even visited. If you live in the Horsleys, the "district centre" is effectively Cobham (ELMBRIDGE) or Leatherhead (MOLE VALLEY). There is nothing in Station Parade to make it this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14956  Respondent: 9327009 / sp2 Consulting Limited (Stephen Parker)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I PART SUPPORT, BUT PART OBJECT I think it is appropriate that these three district centres should support development consistent with the scale and function of the local centre. I think it is appropriate not to approve planning applications for main town centre uses over 100 sq m outside district centres – although this policy could and should be more clearly articulated. I do NOT support consideration of sites on the edge of district centres for town centre uses.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10649  Respondent: 9335041 / David Reeve  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy E8: District Centres

I OBJECT to this policy. There appears to be a complete disjoint between the views of residents and planners. While residents of Ripley and of East Horsley appreciate their local shopping facilities, I suspect that relatively few of them would draw any real distinction between what the draft Local Plan calls District Centres and Local Centres. Most households in both these villages would certainly do their main shopping in major supermarkets in Cobham or Burpham rather than in their “District Centre”. The distinction between District Centres and Local Centres is therefore illusory, and is not helpful in planning terms. Indeed, the Settlement Hierarchy that sought to classify settlements by the facilities that they offered was comprehensively discredited in 2013-14, and now appears to have been downplayed to the point of invisibility in the current round of consultation.

It’s time to face reality, do away with nominal distinctions, and either re-write Policies E8 and E9 from scratch as a single sensible policy, or perhaps draw the distinction instead between village centres and urban centres.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/2636  Respondent: 9335041 / David Reeve  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Paragraph 3 of the Policy makes provision for Station Parade in East Horsley to accommodate “main town centre uses”, which are defined as retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

Frankly, one wonders whether the authors of this Policy have ever bothered to visit East Horsley to see what completely inappropriate nonsense this is. Some of these uses might conceivably be appropriate, but I don’t even think GBC really intended to open the door to the inappropriate ones. There are only three District Centres, so it would have been quite possible to define the specific uses that were really being considered for each District Centre, and to agree them individually with the relevant Parish Council and with residents. As it is currently drafted, it is likely to lead to many unnecessary consultation responses. Moreover the current text fails to comply with NPPF paragraph 154 which states “Local Plans should set out the opportunities for development and clear policies on what will or will not be permitted and where. Only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan.”

I strongly object to this Policy on the grounds that a little sensible reconsideration could produce a draft that would be considerably more acceptable to local residents without significantly changing the planning outcome.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6539  Respondent: 10568769 / Steve Trowbridge  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I also think it is inappropriate to designate the Station Parade as a district centre – the shops, although extensive, are not able to cater for all needs, necessitating additional car journeys to Cobham or Guildford. There is only one bank for example, the main food shop is a “convenience store” not a small supermarket, there are no clothing shops other than charity shops and there is no hardware store.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7099  Respondent: 10615137 / Nav Nair  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

On a specific point, classifying East Horsley’s Station Parade as a Rural District Centre is bizarre. Friends in Effingham use their local rural centre or head to Cobham – they don’t come to Horsley. Merrow or Guildford is used by those in Clandon, Ripley, which is seen as a local centre, has more retail and commercial space. West Horsley is not an obvious development zone.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17325  Respondent: 10627457 / Graeme Morrison  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8
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 Station Parade in East Horsley be designated as a Rural District Centre. The reasons for this proposal are obscure but it is patently unsuitable for the type and scale of developments that that designation allows.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8230  Respondent: 10662849 / Garry Walton  Agent:
**POLICY E8 - District centres**

I OBJECT to the proposal that sites “on the edge” of District Centres being considered for retail developments. This is another Trojan horse policy, allowing retail hubs to be vastly expanded in order to smooth the way for vast new housing estates outside in the countryside (e.g. to meet the “everyday shopping and service needs” of the roughly 1,500 people living in the 600 new homes planned for the Horsleys).

This is a case of back-to-front priorities. Expanded local retail hubs are being proposed in order to justify more housebuilding in the villages, and in a forlorn attempt to mitigate the serious traffic and infrastructure problems this will create. The Council has no business facilitating new supermarkets in the Green Belt. Rural retail capacity should be left to local demand.

The policy proposes not a single measure to support *existing* rural shops and services that are the lifeblood of village communities, e.g. using business rates and other levers at the Council’s disposal.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/1784  **Respondent:** 10776225 / Roger Main  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Policy E8 – District Centres**

I OBJECT. In the previous (2014) Local Plan, District Centres were defined as follows: “*They* have at least 30 commercial units, including a large supermarket and local services such as a bank, and are accessible by public transport. *They* function as district centres because of their number and range of commercial and community uses and their accessibility by public transport.”

- There is no bank in Ripley, and only one in East Horsley.
- East Horsley (Station Parade) has 25 units, many of which are services (library, bank, hairdressers, cafes and take-aways), not retail units. The number rises to 30 only if all the units between Station Parade and the station (Station Approach) are included.
- There is no “large supermarket” in East Horsley or in Ripley. Budgens in East Horsley is small enough not to come under the Sunday trading laws.
- Horsley is served by train from Guildford (4 per hour), Leatherhead and Epsom (2 per hour each), all of which do have large supermarkets accessible from their railway stations. The 478 bus service to the East Horsley village consists of three or four buses per day in each direction (0939, 1139, 1349, 1709 to Leatherhead and 1042, 1242, 1502 [school holidays only] to Guildford) which run on Mondays to Fridays only. It is very unlikely that shoppers will come by train to shop at a convenience store in Horsley. The 478 is used to travel to Tesco at Leatherhead precisely because there is no large supermarket in Horsley.
- Ripley has no railway station (the nearest one is Clandon, some 3 miles away). It does have bus services (515 about every 75 minutes to Guildford or Kingston, 462 or 463 about every hour to Guildford or Woking).
The only reason to designate these villages as District Centres seems to be to make it easier to approve planning permission for additional development adjacent to the shops. The fact that there are empty shops indicates that there is insufficient demand for the status quo. Providing viable additional shopping facilities will require a large influx of shoppers, which the infrastructure is quite unable to support. Furthermore, in East Horsley, there is no space to expand the shopping area nor to provide the inevitable parking requirements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13702  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 E8 (DISTRICT CENTRES):

- Too much scope to expand rural retail centres to justify major housing expansion across the countryside, despite lack of demand. Will spoil character of villages while harming Guildford’s role as a retail hub.
- No measures to support existing rural shops and services, e.g. through business rates.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/339  Respondent: 10799169 / Neal Basson  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY E8 District centres

PART SUPPORT, PART OBJECT We think it is appropriate that these three district centres should support development consistent with the scale and function of the local centre. We think it is appropriate not to approve planning applications for main town centre uses over 100 sq m outside district centres – although this policy could and should be more clearly articulated. We do NOT support consideration of sites on the edge of district centres for town centre uses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18385  Respondent: 10799169 / Neal Basson  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
PART SUPPORT, PART OBJECT We think it is appropriate that these three district centres should support development consistent with the scale and function of the local centre. We think it is appropriate not to approve planning applications for main town centre uses over 100 sq m outside district centres – although this policy could and should be more clearly articulated. We do NOT support consideration of sites on the edge of district centres for town centre uses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/491  Respondent: 10799169 / Neal Basson  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

PART SUPPORT, PART OBJECT We think it is appropriate that these three district centres should support development consistent with the scale and function of the local centre. We think it is appropriate not to approve planning applications for main town centre uses over 100 sq m outside district centres – although this policy could and should be more clearly articulated. We do NOT support consideration of sites on the edge of district centres for town centre uses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17536  Respondent: 10799425 / Guildford Greenbelt Group (Susan Parker)  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We object to policy E8 District centres  We object  to the proposal that sites “on the edge” of District Centres should be considered for retail developments. This is another Trojan horse policy, allowing retail hubs to be vastly expanded in order to smooth the way for vast new housing estates outside in the countryside (e.g. to meet the “everyday shopping and service needs” of the roughly 1,500 people living in the 600 new homes planned for the Horsleys).

This is a case of back-to-front priorities. Expanded local retail hubs are being proposed in order to justify more housebuilding in the villages, and in a forlorn attempt to mitigate the serious traffic and infrastructure problems this will bring.

The Council have no business preparing the way for new supermarkets in the Green Belt. Rural retail capacity should be left to local demand.

The policy proposes not a single measure to support existing rural shops and services that are the lifeblood of village communities, e.g. using business rates and other levers at the Council’s disposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/828  Respondent: 10804961 / M. Basson  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E8
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

PART SUPPORT, PART OBJECT We think it is appropriate that these three district centres should support development consistent with the scale and function of the local centre. We think it is appropriate not to approve planning applications for main town centre uses over 100 sq m outside district centres – although this policy could and should be more clearly articulated. We do NOT support consideration of sites on the edge of district centres for town centre uses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6643  Respondent: 10829121 / Julie Brown  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to POLICY E8 - District centres

- Too much scope to expand rural retail centres to justify major housing expansion across the countryside, despite lack of demand. Will spoil character of villages while harming Guildford’s role as a retail hub.

- No measures to support existing rural shops and services, e.g. through business rates

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11817  Respondent: 10831393 / Catherine Ryder  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the designation of Station Parade as a ‘District Centre’. 

This would misread the nature of the facilities in the village centre and target the area for urban development. Has anyone actually visited our village and been into our very small convenience stores? This designation could have grave consequences for our village because it seems to permit a wide variety of town centre uses which are completely inappropriate for a village the size of East Horsley. We do not need offices, factory outlets, warehousing, tourism developments and other urban and commercial services

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11960  Respondent: 10840129 / Roy Smith  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
4. Station Parade as a District Centre

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13851  Respondent: 10843233 / David Hardiman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

This classification results from a complete misreading of the nature of the facilities in the village centre and would inappropriately target the area for future urban developments. Again, the infrastructure - roads, car parking - cannot cope with significantly more flow.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3480  Respondent: 10843361 / Natalie Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to POLICY E8 - District centres

• Too much scope to expand rural retail centres to justify major housing expansion across the countryside, despite lack of demand. Will spoil character of villages while harming Guildford’s role as a retail hub.
• No measures to support existing rural shops and services, e.g. through business rates.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14478  Respondent: 10846625 / Frank Drennan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

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 E8 “District centres “on the grounds that;

1.2 The proposal that sites “on the edge” of District Centres should be considered for retail developments. This is another Trojan horse policy, allowing retail hubs to be vastly expanded in order to smooth the way for vast new housing estates outside in the countryside (e.g. to meet the “everyday shopping and service needs” of the roughly 1,500 people living in the 600 new homes planned for the Horsleys).
1.3 This is a case of back-to-front priorities. Expanded local retail hubs are being proposed in order to justify more housebuilding in the villages, and in a forlorn attempt to mitigate the serious traffic and infrastructure problems this will bring. The Council have no business preparing the way for new supermarkets in the Green Belt. Rural retail capacity should be left to local demand.

1.4 The policy proposes not a single measure to support existing rural shops and services that are the lifeblood of village communities, e.g. using business rates and other levers at the Council’s disposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17193  Respondent: 10851201 / Jon Woollard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Designating Station Parade East Horsley as a District Centre: Identifying Station Parade, East Horsley as a District Centre and second in the hierarchy of retail and service centres after Guildford town centre is entirely inappropriate for this small parade of local shops in East Horsley and should be rejected. We need to retain the existing atmosphere of Station Parade and our Village. The existing Budgen’s is not a large supermarket but a convenience store which is the only reason it is allowed to open all day on Sundays. There is no spare land around Station Parade with already a shortage of parking spaces for shoppers. East Horsley also has a non-existent bus service to the 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: PSLPP16/8864  Respondent: 10857889 / William Kyte OBE  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy E8: District and Local Centres

I PART OBJECT, PART SUPPORT this policy

I think it is appropriate that these three district centres should support development consistent with the scale and function of the local centre.

I think it is appropriate not to approve planning applications for main town centre uses over 100 sq m outside district centres – although this policy could and should be more clearly articulated.

I do NOT support consideration of sites on the edge of district centres for town centre uses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPP16/8444  **Respondent:** 10858945 / C P Faithful  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Classifying Station Parade, East Horsley as a District Centre

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/18603  **Respondent:** 10858977 / Angela Otterson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to policy E8 District centres

I object to the proposal that sites “on the edge” of District Centres should be considered for retail developments. This is another Trojan horse policy, allowing retail hubs to be vastly expanded in order to smooth the way for vast new housing estates outside in the countryside (e.g. to meet the “everyday shopping and service needs” of the roughly 1,500 people living in the 600 new homes planned for the Horsleys).

This is a case of back-to-front priorities. Expanded local retail hubs are being proposed in order to justify more housebuilding in the villages, and in a forlorn attempt to mitigate the serious traffic and infrastructure problems this will bring. The Council have no business preparing the way for new supermarkets in the Green Belt. Rural retail capacity should be left to local demand.

The policy proposes not a single measure to support existing rural shops and services that are the lifeblood of village communities, e.g. using business rates and other levers at the Council’s disposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/11697  **Respondent:** 10872545 / David and Rachel Price  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I understand that due to a misreading of the type of facilities at the Station Parade, that this small village area could become reclassified as a ‘District Centre”, which would open it up to inappropriate development in the future. To visit the Station Parade would show that this is a thriving parade of village shops, including independent cafes and businesses, as well as bank, and chemist, and a small Budgens. The Budgens is small enough to be able to trade unrestricted hours on a Sunday. There is a library and family run butchers as well as two cafes, both independent. Any future development on a large scale would mean that the smaller businesses would be pushed out in favour of larger retail conglomerates. The whole nature of the village would be changed and we would lose a valuable and vibrant village centre. I understand that the decision to form a district centre in East Horsley would be made on the basis of a misreading of the nature of the
facilities here. There is no room for any development here, and no room for the extra car parking that that would
generate. This is a very concerning issue. Our village centre is just that, not a business centre.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16289  Respondent: 10874241 / James Grzinic  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

I object to Station Parade in East Horsley being designated a ‘District Centre’ which is it not.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13663  Respondent: 10874273 / Margaret Pearce  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

I object to policy E8(District centres). Too much scope to expand rural district centres is given which will
be able to justify major housing expansion across countryside(these) will spoil the character or the Horsley and Ripley
villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17258  Respondent: 10876897 / Norman and Morag Evans  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

East Horsley ‘District Centre’ - I OBJECT

The Plan proposes to designate Station Parade, East Horsley, has a ‘district centre’ which would make it vulnerable to
future urban development. This is an impractical proposal since there is nowhere for any development to be built without
the destruction of existing homes and premises. I also object to the inclusion of Kingtston Field as a site for possible
development. This is a very important local space and a valuable community asset which should remain untouched.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/13671</th>
<th>Respondent: 10877153 / Carol Ann Cullen</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8</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 OBJECT to the classification of Station Parade as a District Centre. This area should not be targeted for future urban development.</td>
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<th>Comment ID: PSLPP16/15720</th>
<th>Respondent: 10892161 / Georgina Price</th>
<th>Agent:</th>
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<td>I understand that due to a misreading of the type of facilities at the Station Parade, that this small village area could become reclassified as a ‘District Centre”, which would open it up to inappropriate development in the future. To visit the Station Parade would show that this is a thriving parade of village shops, including independent cafes and businesses, as well as bank, and chemist, and a small Budgens. The Budgens is small enough to be able to trade unrestricted hours on a Sunday. There is a library and family run butchers as well as two cafes, both independent. Any future development on a large scale would mean that the smaller businesses would be pushed out in favour of larger retail conglomerates. The whole nature of the village would be changed and we would lose a valuable and vibrant village centre. I understand that the decision to form a district centre in East Horsley would be made on the basis of a misreading of the nature of the facilities here. There is no room for any development here, and no room for the extra car parking that that would generate. This is a very concerning issue.</td>
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<th>Comment ID: PSLPP16/7825</th>
<th>Respondent: 10896801 / Clare Fluker</th>
<th>Agent:</th>
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<td>To suggest that the central small shopping area in East Horsley is a &quot;District Centre” is just ridiculous. Perhaps whoever wrote this part of the Local Plan should try visiting the area and should also check the definition of a &quot;District Centre” before making such a suggestion.</td>
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<th>Comment ID: PSLPP16/18139</th>
<th>Respondent: 10910273 / Lynda M Williams</th>
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Page 38 of 68
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We support this policy, including the designation of Station Parade, East Horsley, as a District Centre under the draft Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16550  Respondent: 10915681 / Karen Bushnell  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

5) I also object and question the proposal Policy E8 District Centres. I would argue that East Horsley does not meet the criteria of a District Centre as we do not have a large Supermarket and so should not be considered in this category, nor indeed do I desire the village to expand and develop to an extent as to be in this category.

Thank you for the opportunity to make my comments on the proposals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11328  Respondent: 10923297 / Matthew Burnham  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY E8 (DISTRICT CENTRES):

• Too much scope to expand rural retail centres to justify major housing expansion across the countryside, despite lack of demand. Will spoil character of villages while harming Guildford’s role as a retail hub.
• No measures to support existing rural shops and services, e.g. through business rates.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16085  Respondent: 10927841 / Frank Milton  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8
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 Station Parade in East Horsley be designated as a Rural District Centre. The reasons for this are obscure but it is patently unsuitable for the type and scale of developments that that designation allows.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1717  Respondent: 10933793 / Julia Tilbury  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY E8 - District centres

I OBJECT to the proposal that sites "on the edge" of District Centres should be considered for retail developments. This is another Trojan horse policy, allowing retail hubs to be vastly expanded in order to smooth the way for vast new housing estates outside in the countryside (e.g. to meet the "everyday shopping and service needs" of the roughly 1,500 people living in the 600 new homes planned for the Horsleys).

This is a case of back-to-front priorities. Expanded local retail hubs are being proposed in order to justify more housebuilding in the villages, and in a forlorn attempt to mitigate the serious traffic and infrastructure problems this will bring. The Council have no business preparing the way for new supermarkets in the Green Belt. Rural retail capacity should be left to local demand.

The policy proposes not a single measure to support existing rural shops and services that are the lifeblood of village communities, e.g. using business rates and other levers at the Council's disposal.

"11 NPPF 59: "Local planning authorities should consider ... the overall scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally."

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1689  Respondent: 10933857 / C J Tilbury  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY E8- District centres

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"11 NPPF 59: “Local planning authorities should consider ... the overall scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15374  Respondent: 10935201 / Cathryn Walton  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 that sites “on the edge” of District Centres being considered for retail developments. This is another Trojan horse policy, allowing retail hubs to be vastly expanded in order to smooth the way for vast new housing estates outside in the countryside (e.g. to meet the “everyday shopping and service needs” of the roughly 1,500 people living in the 600 new homes planned for the Horsleys).

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The policy proposes not a single measure to support existing rural shops and services that are the lifeblood of village communities, e.g. using business rates and other levers at the Council’s disposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11603  Respondent: 10951105 / Richard Bray  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Station Parade designated a District Centre – This classification results from a complete misreading of the nature of the facilities in the village centre and would inappropriately target the area for future urban developments. The few shops are already surrounded by residential homes

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: PSLPP16/12031</th>
<th>Respondent: 10952097 / Peder Banér</th>
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<td>It is not explained why the “Station Parade” in East Horsley has been designated a “District Centre”. The facilities there are only limited and serve mainly the local needs. The parking facilities there are already stretched to the limit for much of the time. A “Local Centre” would be a much more relevant description.</td>
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<th>Comment ID: PSLPP16/14048</th>
<th>Respondent: 10965953 / Mark Thompson</th>
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<td>we object to Station Parade being designated a District Centre as this classification does not accurately reflect the nature of the village facilities and will target this area for future urban developments.</td>
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<tr>
<th>Comment ID: PSLPP16/15687</th>
<th>Respondent: 10967329 / Steve Johnson</th>
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<td>Station Parade is designated a “District Centre” - This &quot;classification&quot; results from a complete misreading of the nature of the facilities in the village centre &amp; would inappropriately target the area for future urban developments.</td>
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<th>Comment ID: PSLPP16/9211</th>
<th>Respondent: 10985057 / Anthony Parker</th>
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**Policy E8 District centres** – I **PART SUPPORT, BUT PART OBJECT** I think it is appropriate that these three district centres should support development consistent with the scale and function of the local centre. I think it is appropriate not to approve planning applications for main town centre uses over 100 sq m outside district centres – although this policy could and should be more clearly articulated. I do NOT support consideration of sites on the edge of district centres for town centre uses.

**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: PSLPP16/7501</th>
<th>Respondent: 11000289 / Nick Bomford</th>
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<td>I object to Station Parade being designated a “District Centre”</td>
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This 'designation' results from a misreading of the nature of the facilities in the village centre and would target the area inappropriately for future urban developments.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/13889</th>
<th>Respondent: 11001249 / Lesley Milton</th>
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<td>I OBJECT to the proposed new settlement boundary in East and West Horsley. In particular I object to 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 and make it more vulnerable to future development. Kingston Meadows is the main public recreational space of East Horsley, comprising various sports facilities and playing fields.</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>I OBJECT to the proposal that Station Parade in East Horsley be designated as a Rural District Centre for reasons which are obscure but it is patently unsuitable for the type and scale of developments that designation allows.</td>
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</table>
The retail environment at Station Parade consists of 25 premises including a library, post office, chemist, 5 restaurant/cafes, butcher, baker and 2 mini supermarkets. The largest of these is approximately 170-200 sq. m. There is no room for expansion of retail premises nor for the provision of extra parking places.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15253  Respondent: 11002881 / Sheila Proctor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We previously commented on your designation of East Horsley as a Rural District Centre in the draft Local Plan. We note that the designation has now changed to a District Centre and we repeat our objection to this on the grounds that the designation completely misreads the situation. The direction of main town centre uses towards the village, as a District Centre, would not only be inappropriate and unsustainable, but would be physically impossible to introduce. It should also be noted that there is already insufficient parking in the village for those using the local amenities, and there is no available space to alleviate this. The error in designating East Horsley as a District Centre is compounded by the fact that Cobham, which is in close proximity but outside the GBC boundary, is in reality the District Centre for the Horsleys and vicinity. The reason for this is the much more extensive range of services available, including two large supermarkets and branches of 4 different banks, compared to the Horsleys where there is no large supermarket and only one bank.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17871  Respondent: 11009057 / Lucy Fairley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Designation of East Horsley as a District Shopping Centre

The Local Plan designates East Horsley as a “District Shopping Centre”. This is extraordinary given that East Horsley houses a small collection of shops (convenience store, hairdresser, butcher, bank, pharmacy) typical of a medium sized village centre. The facilities are not in any way those of a main town centre, or urban area, from the perspective of either retail (there is no supermarket), leisure, office or arts/culture facilities. I object strongly to East Horsley being designated as a District Shopping Centre – it should be classified as a Local Centre.

Furthermore the local facilities and infrastructure would be completely overwhelmed by the scale of the proposed developments in East Horsley, West Horsley and the former Wisley airfield site. In particular the road infrastructure, East Horsley shops, health services, schooling and train transport – many of these are already stretched and in some cases inadequate for the current residential community. I see no suitable sustainable proposals on supporting infrastructure investment outlined in the Local Plan to justify the proposed level of development and therefore object to these proposed developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The Local Plan amendments clarify definitions which in my view confirm that Station Parade, East Horsley should not be designated as a “District Centre”. Neither should this be designated as a “Strategic Employment Centre. East Horsley is a small collection of shops (convenience store, hairdresser, butcher, bank, pharmacy) typical of a medium sized village centre and should more appropriately be designated a “rural local centre”. The facilities are not in any way those of a main town centre, or urban area, from the perspective of either retail (there is no supermarket), employment, leisure, office or arts/culture facilities.

These local facilities and infrastructure would be completely overwhelmed by the scale of the proposed developments in East Horsley, West Horsley and in particular, Wisley Airfield/Ockham. The road infrastructure, East Horsley shops, health services, schooling and train transport are already stretched and in some cases already inadequate for the current residential community.

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 note that in the latest version of the local plan that the Station Parade in East Horsley has been designated a District Centre which is incorrectly identifying the village facilities in order to justify inappropriate development of the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I do support the designation of Bishopsmead Parade, East Horsley, as a rural Local Centre under the draft Local Plan and the designation of Station Parade, East Horsley, as a District Centre under the draft Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Additionally I object to Policy E8 – District Centres

It appears that the plan is proposing to expand in retail centres in rural areas. This is obviously to demonstrate that there is a demand for housing in said rural areas. This will harm the character of the surrounding villages I have lived in for the last 3 decades and there is no demand from the locals? Why would the borough council think this acceptable and risk moving trade out of Guildford town centre where a significant amount of money is being spent on redevelopment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPP16/17817  Respondent: 11033921 / Tim Depledge  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8
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?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object - This is a wishy washy policy written by someone who has clearly not been to Station Parade, East Horsley, written in such a way to justify future housing developments can be catered for by local shops. There is no room for expansion in East Horsley ...

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16518  Respondent: 11036801 / Judith Mercer  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

This policy will allow development for more retail spaces in rural areas with is consequent housing expansion. This is not wanted or needed and is completely unjustified in the light of the explosion of online retail businesses. Guildford’s position of the primary retail hub would be hurt by this policy. Rural shops would also be hit as they would not be able compete with larger retailers. The whole character of the villages would change and they would be subsumed into the urbanisation and sprawl which is expressly against the provisions of the NPPF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14279  Respondent: 11037153 / Jason Richards  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Station Parade being designated a "District Centre". The services and facilities offered at Station Parade have been misread in the report and I am afraid this area could be developed unfavourably in the future.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15397  Respondent: 11039041 / Robert Foreman  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Designating Station Parade in East Horsley as a district centre is a joke. The current shops are only suitable for ad-hoc shopping. Most residents travel to Cobham or Burpham or further for super-market shopping. The car parking in and around station parade is already close to capacity. The Medical Centre is also at capacity with difficulties now in obtaining a timely appointment, and parking is an issue also at the Medical Centre.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12469  Respondent: 11041601 / Robert Bayley  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

DEFINITION OF STATION PARADE AS A “DISTRICT CENTRE”

I OBJECT to this classification.

I, and many others, argued this point in previous letters and am rather incensed that this is still an issue. Staion Parade is in no shape or form a “district centre” and yet again one must question whether any member of the Plan’s drafting committee has bothered to come here and take a look?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7304  Respondent: 11045761 / Sean Dowdeswell  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Station Parade being designated a ‘District Centre’. This is a misreading of the nature of the facilities in the village centre and would inappropriately target the area for future urban development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16208  Respondent: 11047809 / Jeremy Frost  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Station Parade in East Horsley: The plan designates this as a “Rural District Centre”, partly because of Budgens which is described as a large supermarket. Anyone living in East and West Horsley knows that it is a very small supermarket and hence due to its size, is able to open on a Sunday. Parking is already quite difficult and if the potential number of shoppers were to increase, then particularly the elderly and less able residents would struggle to reach the shops when they needed to. This is a total misinterpretation of the local facilities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** pslp171/255  **Respondent:** 11051521 / J and M Baylis  **Agent:**  
**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy E8  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Introduction of ‘Main town centre uses’ noted. Do these also have some relevance to Policy E7?  
What changes (2016)/further amendments (2017) do you suggest should be made to the document?  
Attached documents:

**Comment ID:** PSLPP16/17086  **Respondent:** 11060065 / Meredith Hopkins  **Agent:**  
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E8  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the designation of Station Parade as a 'District Centre' - This results from a misreading of the nature East and West Horsley, Effingham and Ockham as linked but separate communities and a misreading of the nature of the facilities in each community. The new designation would inappropriately focus new commercial development in the 'District Centre'.  
What changes (2016)/further amendments (2017) do you suggest should be made to the document?  
Attached documents:

**Comment ID:** PSLPP16/17417  **Respondent:** 11063233 / David Ebdon  **Agent:**  
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E8  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The fact that Station Parade is designated a ‘District Centre’ is totally misleading and has therefore quite incorrectly attracted a spurious need for new houses. Something that again shows a complete lack of local understanding of the village.  
What changes (2016)/further amendments (2017) do you suggest should be made to the document?  
Attached documents:

**Comment ID:** PSLPP16/8837  **Respondent:** 11071553 / Nicholas Roberts  **Agent:**  
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E8  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY E8 (DISTRICT CENTRES) – Object to the idea of extending rural shopping centres since this is being used to justify disproportionate housebuilding across the countryside. It would not only spoil the villages but the town’s chances
I can’t see any measures here to support the small retailers who are the lifeblood of our villages, even though the council has tools at its disposal, eg the business rates system.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16287  Respondent: 11086433 / Colin Carmichael  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E8
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. Station Parade is designated as a ‘district centre’: this designation results from a misreading of the nature of the facilities in the village and would inappropriately target the area for future urban developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13860  Respondent: 11100033 / Penny Orpwood  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E8
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I also object to the classification of the East Horsley Station Parade as a designated “District Centre” this is pure artistic licence by the Plans authors, it is just a small shopping parade.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12501  Respondent: 11101345 / Katja Schilling-Bayley  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E8
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I strongly OBJECT to the proposal that sites “on the edge” of District Centres will be considered for retail developments.

This is clearly leaving the door wide open for the expansion of retail hubs – which will become necessary to “meet everyday shopping and service needs” of the proposed new housing estates in the countryside.

This is clearly a case of “horse before carriage”. Expanded retail hubs are being proposed in order to sneakily justify expanded house construction in the villages. Yet without proper consideration of the - already existent - traffic and infrastructure problems.

Why not support existing rural shops and services instead? These have far more character and will give the villages back their historic characters, rather than turning them into “High-Street-Wannabies”.

I also object to the classification of the East Horsley Station Parade as a designated “District Centre” this is pure artistic licence by the Plans authors, it is just a small shopping parade.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4771  Respondent: 15084897 / Save Send Action Group (Andrew Procter)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

25  POLICY E8 DISTRICT CENTRES

25.1  I object to policy E8 District centres

25.2  I object to the proposal that sites “on the edge” of District Centres should be considered for retail developments. This is another Trojan horse policy, allowing retail hubs to be vastly expanded in order to smooth the way for vast new housing estates outside in the countryside (e.g. to meet the “everyday shopping and service needs” of the roughly 1,500 people living in the 600 new homes planned for the Horsleys).

25.3  This is a case of back-to-front priorities. Expanded local retail hubs are being proposed in order to justify more housebuilding in the villages, and in a forlorn attempt to mitigate the serious traffic and infrastructure problems this will bring. The Council have no business preparing the way for new supermarkets in the Green Belt. Rural retail capacity should be left to local demand.

25.4  The policy proposes not a single measure to support existing rural shops and services that are the lifeblood of village communities, e.g. through business rates and other levers at the Council’s disposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8936  Respondent: 15107297 / Ian McQuattie  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY E8 (DISTRICT CENTRES):

• Too much scope to expand rural retail centres to justify major housing expansion across the countryside, despite lack of demand. Will spoil character of villages while harming Guildford’s role as a retail hub.
• No measures to support existing rural shops and services, e.g. through business rates.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13747  Respondent: 15227905 / Nigel Alexander  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E8
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY E8 (DISTRICT CENTRES):
• Too much scope to expand rural retail centres to justify major housing expansion across the countryside, despite lack of demand. Will spoil character of villages while harming Guildford’s role as a retail hub.
• No measures to support existing rural shops and services, e.g. through business rates.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/1745</th>
<th>Respondent: 15244641 / Wesley Raynbird-Tilbury</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY E8 - District centres

I OBJECT to the proposal that sites "on the edge" of District Centres should be considered for retail developments. This is another Trojan horse policy, allowing retail hubs to be vastly expanded in order to smooth the way for vast new housing estates outside in the countryside (e.g. to meet the "everyday shopping and service needs" of the roughly 1,500 people living in the 600 new homes planned for the Horsleys).

This is a case of back-to-front priorities. Expanded local retail hubs are being proposed in order to justify more housebuilding in the villages, and in a forlorn attempt to mitigate the serious traffic and infrastructure problems this will bring. The Council have no business preparing the way for new supermarkets in the Green Belt. Rural retail capacity should be left to local demand.

The policy proposes not a single measure to support existing rural shops and services that are the lifeblood of village communities, e.g. using business rates and other levers at the Council's disposal.

"11 NPPF 59: "‘Local planning authorities should consider ... the overall scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally.’"

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/1809</th>
<th>Respondent: 15247265 / Aileen Aitcheson</th>
<th>Agent:</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? ( )

POLICY E8: District centres
I support this policy, including the designation of Station Parade, East Horsley, as a District Centre under the draft Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1833  Respondent: 15247745 / Brian Aitcheson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY E8: District centres

I support this policy, including the designation of Station Parade, East Horsley, as a District Centre under the draft Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2491  Respondent: 15282433 / Kentucky Fried Chicken (GB) Limited (Chris Holmes)  Agent: SSA Planning Limited (Steve Simms)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( No ), is Legally Compliant? ( Yes )

POSITIVELY PREPARED

The draft policy is not based on any objectively assessed development requirement. It effectively assesses the requirement for hot food takeaways within 500 metres of the boundary of a school as zero, but does so without evidence of either a link between the incidence of obesity and the proximity of hot food takeaways to such places or any particular distance at which that link is demonstrated. Consequently, the development requirement has not been objectively assessed.

In fact, the distance chosen could have the effect of banning hot food takeaways from a majority of the Borough. No assessment has been made of the number of hot food takeaways that might be refused as a result of this or what the social, economic or environmental impacts of that might be, so it is not possible to balance these impacts.

The policy is negative in its assumptions, using the concept of ‘unhealthy food’, which is at best unhelpful in isolation from an understanding of the person eating the food, their health and lifestyle, and at worst is simply subjective. Furthermore, it assumes all hot food takeaways offer little choice and serve the same type and standard of food.

We are further of the view that food of high energy density or poor nutritional value is sold from and at a range of premises within a variety of other classes, including many in Class A1, such as coffee or sandwich shops, bakeries or, simply, supermarkets, and that focussing on Class A5 uses is both unhelpful and unfair.

JUSTIFIED
There is no evidence for a causal link between the incidence of obesity and proximity of hot food takeaways to schools and only limited evidence of any correlation at all, so it is unclear how refusing planning permission for hot food takeaways within 500 metres of such locations could ever be justified.

The inclusion of primary schools is particularly problematic, as it is clear that children at primary schools are not usually permitted to leave the premises at lunchtime and, given their age, are unlikely to travel to or from school unaccompanied. Outside school time, children’s diets are quite properly the responsibility their parents or guardians.

Consequently, it is far from clear how refusing planning permission for hot food takeaways within 500 metres of primary schools could ever be justified. This was the view taken by a Planning Inspector in an appeal (APP/P4415/A/11/2159082) against refusal of a restaurant and hot food takeaway in January 2012.

The Evidence Base contains no evidence of any threshold number of hot food takeaways at which the harm that the draft policy seeks to mitigate occurs or is noticeably greater, nor any threshold distance. Indeed, there is no evidence of a causal spatial link between clusters of hot food and the incidence of obesity or overweight at all.

It is better to rely on objective evidence in a retail study to set maximum proportions of hot food takeaways. Whilst these are primarily directed at protecting the retail health of designated centres, there is scope to widen their application to support the retail health of retail provision outside centres, such as standalone or parade units.

As it is usually impractical to apply a maximum frontage proportion outside centres, the 500-metre walk distance might be applied, within which the proportion (rather than number) of units, be they in- or out-of-centre, used as hot food takeaways would not be permitted to exceed the same threshold as set for centres.

In adopting such an approach, it would be preferable to consider optimal proportions of all retail uses that could contribute to healthy centres or to a healthy offer generally, whether in- or out-of-centre, instead of focussing on particular uses considered to be a problem, apparently for wider social reasons unrelated to retail planning.

On a practical point, there is a significant difficulty in using distance radii in that it takes no account of real barriers, physical or perceptual, so that premises on the other side of a line feature such as a canal or busy road could be affected despite in reality being more than a 500m walk away. It is far better to use real walk isochrones.

EFFECTIVE

For the reasons set out, it is unclear how refusing permission for hot food takeaways within 500 metres of primary schools could ever be effective.

Some hot food takeaways, together with restaurants, pubs and shops are clearly a source of cheap, energy dense and nutrient poor foods, however, not all hot food takeaways, restaurants, pubs and shops are, and the planning system is ineffective in distinguishing between those that are and those that are not.

The area that would be affected by the policy could cover a large and variable part of the Borough, so it is hard to see how the effectiveness of its extent could be monitored. Would poor or negative achievement against objectives result in reduction or expansion of the zones? What other corrective action might be taken short of its withdrawal?

Diet is clearly a key determinant both of general health and obesity levels. Exercise is the other key determinant and must be considered for a complete picture. Focussing on improving access to open space, sport and recreation facilities would be a far more effective strategy for reducing childhood obesity.

CONSISTENT WITH NATIONAL POLICY

We consider that no regard has been given to national policy and advice in preparing Policy E8 because no National Planning Policy Framework (NPPF) policies deal with dietary issues.

Specifically, taking into account proximity of hot food takeaways to schools has no basis in national policy and national practice guidance simply refers to a briefing paper containing case studies on the issue. Indeed, restricting accessibility to services and facilities is directly contrary to national policy.
The NPPF recognises the role planning takes in better enabling people to live healthier lifestyles. However, it seeks to do this by creating, not restricting choice, by increasing access to recreation and health services, and by ensuring developments are within walkable distances of local facilities and public transport to other facilities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp171/1154  **Respondent:** 15282433 / Kentucky Fried Chicken (GB) Limited (Chris Holmes)  **Agent:** SSA Planning Limited (Steve Simms)

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy E8

**Do you consider this section of the document; complies with the Duty to Cooperate?** (Yes), **is Sound?** (No), **is Legally Compliant?** (Yes)

Whilst we support additional clarity, we consider that food of high energy density or poor nutritional value is sold from and at a range of premises within a variety of other classes, including many in Class A1, such as coffee or sandwich shops, bakeries or, simply, supermarkets, and that focussing on Class A5 uses is both unhelpful and unfair.

We are also unclear why Class A5 has been specified in respect of policies E8 and E9, but not in respect of policy E7.

We maintain our objection to section (5) of policy E8.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Deletion of section (5) of policy E8.

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**Comment ID:** PSLPP16/10958  **Respondent:** 15282625 / Kelly Graves  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

I OBJECT TO POLICY E8 (DISTRICT CENTRES):
• Too much scope to expand rural retail centres to justify major housing expansion across the countryside, despite lack of demand. Will spoil character of villages while harming Guildford’s role as a retail hub.
• No measures to support existing rural shops and services, e.g. through business rates.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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**Comment ID:** PSLPP16/2795  **Respondent:** 15298849 / Elaine Burns  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )
ECONOMY POLICIES

POLICY E8: District centres

I support this policy, including the designation of Station Parade, East Horsley, as a District Centre under the draft Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3454  Respondent: 15320737 / Steven Brown  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to POLICY E8 - District centres

• Too much scope to expand rural retail centres to justify major housing expansion across the countryside, despite lack of demand. Will spoil character of villages while harming Guildford’s role as a retail hub.
• No measures to support existing rural shops and services, e.g. through business rates.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3318  Respondent: 15327905 / Julia Cook  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY E8 - District centres

I OBJECT to the proposal that sites “on the edge” of District Centres should be considered for retail developments. This is another Trojan horse policy, allowing retail hubs to be vastly expanded in order to smooth the way for vast new housing estates outside in the countryside (e.g. to meet the “everyday shopping and service needs” of the roughly 1,500 people living in the 600 new homes planned for the Horsleys).

This is a case of back-to-front priorities. Expanded local retail hubs are being proposed in order to justify more housebuilding in the villages, and in a forlorn attempt to mitigate the serious traffic and infrastructure problems this will bring. The Council have no business preparing the way for new supermarkets in the Green Belt. Rural retail capacity should be left to local demand.

The policy proposes not a single measure to support existing rural shops and services that are the lifeblood of village communities, e.g. using business rates and other levers at the Council’s disposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
5. Station Parade should not be a district centre

I object to Station Parade being classified as a District Centre. In my opinion it is not appropriate as a place for more urban development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Station Parade in East Horsley is currently a village centre with about 15 shops/restaurants, with very limited scope for any expansion. There is no space for additional car parking and access to the shops is already difficult at some times of day. It is not, and cannot become, a “District Centre” with the expansion that implies without building across existing housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4346  Respondent: 15360065 / Alan Staines  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E8  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

4) Station Parade is designated a " District Centre ".

This designation reflects a complete misunderstanding of the nature of the facilities in the village centre and would as a consequence inappropriately focus attention on Station Parade as an area for future urban development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4829  Respondent: 15377953 / cctvtraining.com ltd (Gordon Tyerman)  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E8  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY E8 District centres

GROUNDS FOR OBJECTION We think it is appropriate that these three district centres should support development consistent with the scale and function of the local centre. We think it is appropriate not to approve planning applications for main town centre uses over 100 sq m outside district centres – although this policy could and should be more clearly articulated. We do NOT support consideration of sites on the edge of district centres for town centre uses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6791  Respondent: 15438945 / Jacqueline Davies  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E8  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to POLICY E8 - District centres

- Too much scope to expand rural retail centres to justify major housing expansion across the countryside, despite lack of demand. Will spoil character of villages while harming Guildford’s role as a retail hub.
- No measures to support existing rural shops and services, e.g. through business rates.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14373  Respondent: 15446401 / Louise Yandle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY E8 (DISTRICT CENTRES):
- Too much scope to expand rural retail centres to justify major housing expansion across the countryside, despite lack of demand. Will spoil character of villages while harming Guildford’s role as a retail hub.
- No measures to support existing rural shops and services, e.g. through business rates.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7310  Respondent: 15448001 / Ann Dowdeswell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Station Parade being designated a ‘District Centre’. This is a misreading of the nature of the facilities in the village centre and would inappropriately target the area for future urban development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7510  Respondent: 15449665 / Robin & Victoria Doelly  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Infrastructure will be further stretched to cope and Station Parade should not be classified as a district centre.

I believe this would have a real negative impact locally and for the enjoyment of the many who come and visit this area leading into the surrey hills on a regular basis.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/7639</th>
<th>Respondent: 15450817 / Audrey Gachen</th>
<th>Agent:</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: PSLPP16/7769</th>
<th>Respondent: 15452065 / Fiona Jackson</th>
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</table>

The re-designation of our small parade of shops to 'District Centre' is surely misleading as that implies 'a group of shops separate from a TOWN centre' when surely we are a 'Local Centre'? This labelling can only imply that the retail facilities are greater than they currently are?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

<table>
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<tr>
<th>Comment ID: PSLPP16/8439</th>
<th>Respondent: 15466177 / D.L. + E.J. Wilkinson</th>
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<th>Comment ID: PSLPP16/8712</th>
<th>Respondent: 15475041 / Anne Geary</th>
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I support this policy, including the designation of Station Parade, East Horsley, as a District Centre under the draft Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/8937  Respondent: 15478017 / Kirstie Pankhurst  Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8 |
| 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: PSLPP16/10020  Respondent: 15495745 / David Williams  Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |

Designating station road as a district centre is wrong. It results from a complete misreading of the nature of the facilities in the village centre and would inappropriately target the area for future urban developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/10044  Respondent: 15495873 / Gerard Duvé  Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |

District Centres
I object to rural villages becoming District Centres when they are already viable and sustainable local centres. District Centres are preparing the infrastructure for large development and ignore the wishes of residents in those local centres.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10123  Respondent: 15496897 / Iris Watts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Station Parade serves the village very well - village being the OPERATIVE word

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/11813  Respondent: 15502465 / Mark Bourner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Designation of East Horsley as a ‘District Centre’ - I understand that a district centre can be described as ‘a LARGE group of shops, together with supporting non-retail facilities and services. They normally feature not less than 50 units’. We are a village with a handful of shops and therefore should not be classed as a district centre.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11083  Respondent: 15509057 / Richard Golding  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

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 sites “on the edge” of District Centres should be considered for retail developments. This is absolutely crazy. Shops in existing villages are closing and being converted into residential property. So there must be another reason, it could well be let build shops, then we have a good reason to build a lot more houses. This nothing more than creeping urbanisation one of the reason the Green Belt policy was established after the Second World War. This is another Trojan horse policy, allowing retail hubs to be established and expanded in order to smooth the way for vast new housing estates outside in the countryside, and in a forlorn attempt to mitigate the serious traffic and infrastructure problems large housing developments will bring. The Council has no business preparing the way for new supermarkets in the Green Belt. Rural retail capacity should be left to local demand. The policy proposes not a single measure to support existing rural shops and services that are the lifeblood of village communities, e.g. using business rates and other levers at the Council’s disposal.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11276  Respondent: 15570145 / Owen Eszeki  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ) is Sound? ( ) is Legally Compliant? ( )

Policy E8 - District Centres

I object to rural villages becoming District Centres when they are already viable and sustainable local centres. District Centres are preparing the infrastructure for large development and ignore the wishes of residents in those local centres.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11275  Respondent: 15570209 / Emily Cross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ) is Sound? ( ) is Legally Compliant? ( )

Policy E8 - District Centres

I object to rural villages becoming District Centres when they are already viable and sustainable local centres. District Centres are preparing the infrastructure for large development and ignore the wishes of residents in those local centres.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11454  Respondent: 15571425 / Monika Neczaj  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ) is Sound? ( ) is Legally Compliant? ( )

I OBJECT TO POLICY E8 (DISTRICT CENTRES):

- Too much scope to expand rural retail centres to justify major housing expansion across the countryside, despite lack of demand. Will spoil character of villages while harming Guildford’s role as a retail hub.
- No measures to support existing rural shops and services, e.g. through business rates.

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: PSLPP16/12021</th>
<th>Respondent: 15578977 / Norman Evans</th>
<th>Agent:</th>
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<tr>
<td>The Plan proposes to designate Station Parade, East Horsley, has a ‘district centre’ which would make it vulnerable to future urban development. This is an impractical proposal since there is nowhere for any development to be built without the destruction of existing homes and premises. I also object to the inclusion of Kingston Field as a site for possible development. This is a very important local space and a valuable community asset which should remain untouched.</td>
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<th>Comment ID: PSLPP16/14269</th>
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<th>Agent:</th>
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• No measures to support existing rural shops and services, e.g. through business rates. |
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<th>Comment ID: PSLPP16/16277</th>
<th>Respondent: 15603361 / Ann Watkins</th>
<th>Agent:</th>
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- No measures to support existing rural shops and services, e.g. through business rates.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15674  Respondent: 15618881 / Jayne Barmby  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

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 sites “on the edge” of District Centres should be considered for retail developments. This is another Trojan horse policy, allowing retail hubs to be vastly expanded in order to smooth the way for vast new housing estates outside in the countryside (e.g. to meet the “everyday shopping and service needs” of the roughly 1,500 people living in the 600 new homes planned for the Horsleys). This is a case of back-to-front priorities. Expanded local retail hubs are being proposed in order to justify more housebuilding in the villages, and in a forlorn attempt to mitigate the serious traffic and infrastructure problems this will bring. The Council have no business preparing the way for new supermarkets in the Green Belt. Rural retail capacity should be left to local demand. The policy proposes not a single measure to support existing rural shops and services that are the lifeblood of village communities, e.g. using business rates and other levers at the Council’s disposal.

11 NPPF 59: “Local planning authorities should consider… the overall scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15707  Respondent: 15619041 / Jack Cross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy E8 - District Centres

I object to rural villages becoming District Centres as they are just preparing the infrastructure for large housing developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16341  Respondent: 15640897 / Jackie van Heesewijk  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8
**I OBJECT TO POLICY E8 (DISTRICT CENTRES):**

- Too much scope to expand rural retail centres to justify major housing expansion across the countryside, despite lack of demand. Will spoil character of villages while harming Guildford’s role as a retail hub.
- No measures to support existing rural shops and services, e.g. through business rates.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/18549  **Respondent:** 15697665 / Campaign for Real Ale (Mick Bell)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Guildford Borough Local Plan – Proposed Submission Local Plan: strategy sites 2016**

I am writing on behalf of the Surrey/Hants Borders Branch of CAMRA, the Campaign for Real Ale, in relation to the above consultation.

As you would expect, CAMRA’s chief concern is that the Local Plan will afford suitable protection, in planning terms, for public houses. The continuing loss of traditional pubs, both in urban and rural settings, is in our view having a very negative effect on the communities concerned. The planning system affords a potentially powerful line of defence against the efforts of some pub owners to make short-term financial gains at the expense of valuable community facilities. Our hope would be that the Local Plan will include policies which support the retention of community assets like pubs and resist applications for

I am also pleased to note that Policy E5, contains a specific mention of public houses in terms of businesses that will be supported for retention in rural areas. I would agree that pubs they often essential in maintaining the local economy in rural villages. **However, this can equally apply in urban areas, such as for example the suburbs of Guildford, where whole communities often have a single pub to act as the focus of the community. I would therefore like to see this policy extended to cover all communities, not just rural areas.**

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/17169  **Respondent:** 15733697 / Ripley Carriage Ltd (The Burr Family)  **Agent:** Shrimplin Brown (James Brown)

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

The identification of Ripley as a District Centre is supported, however, the opportunities to expand the facilities, shops and services in Ripley are limited.
Site Allocation A45: Land at the rear of the Talbot, High Street, Ripley provides an opportunity to deliver 90 sqm of new floorspace within the shopping frontage. The Council should include this additional floorspace on the Table at Page 28.

The policy should, however, allow flexibility for new units to come forward for a flexible range of; A1, A2, A3, A4, A5, B1a or D class uses. These uses will support the vitality and viability of the District centre.

**SUPPORT subject to an amendment to the text stating:** “In order to strengthen the liveliness and economic resilience of the borough’s District Centres, retail developments or other suitable District Centre uses including; restaurants, takeaways, small scale offices and community uses, consistent with the scale and function of that centre, will be supported in the Primary Shopping Area.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

**Attached documents:**

**Comment ID:** pslp171/1484  **Respondent:** 15733697 / Ripley Carriage Ltd (The Burr Family)  **Agent:** Shrimplin Brown (James Brown)

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**POLICY E8: DISTRICT CENTRES**

1.76 The identification of Ripley as a District Centre is supported, however, the current opportunities to expand the facilities, shops and services in Ripley are limited.

1.77 Site Allocation A45: Land at the rear of the Talbot, High Street, Ripley provides a rare opportunity to deliver 90 sqm of new floorspace within the shopping frontage.

1.78 The specific support for both retail and 'other main town centre uses’ within the Borough District Centres is supported. For clarity the Council should make it clearer what uses will be specifically supported. The definition at 4.4.87b is deemed to be largely irrelevant for the District Centres identified and accordingly it would be more realistic to set out a range of realistically deliverable uses which would logically include D Class uses and also in appropriate circumstances office use (B1a)

**SUPPORT subject to an amendment to the text stating:** “In order to strengthen the liveliness and economic resilience of the borough’s District Centres, retail developments or other suitable District Centre uses including; restaurants, takeaways, small scale offices and community uses, consistent with the scale and function of that centre, will be supported in the Primary Shopping Area.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

**Attached documents:**

**Comment ID:** PSLPP16/15566  **Respondent:** 15977889 / Charles Kimpton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
OBJECT. To the use of district centres for town centre uses

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Total records: 189.
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

Document part: Policy E9 - Local Centres and isolated retail units
E9. Local Centres

We have no “local centre” to provide our local community with everyday shopping and service facilities. It is suggested that a part of the upper High Street and the adjoining parts of Epsom and London Road be given a suitable designation to encourage the location of everyday retail and service facilities there, together with Council intervention to ensure rentals are affordable. An indoor market might also help address the problem.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
be included within the plan to ascertain whether the centres themselves are viable for without them, the sites are unsustainable and should be removed from the

6A traffic and transport assessment should support the retail assessment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13050  Respondent: 8573793 / Harry Eve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

78. I object to further retail development adjacent to Bishopsmead Parade, East Horsley. It is unnecessary and inappropriate. The same objection is likely to apply to some or all of the other sites mentioned.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7016  Respondent: 8575617 / Effingham Parish Council (Ian Symes)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

E9 Economy– Local Centres

Support

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/17563  Respondent: 8581505 / Burpham Neighbourhood Forum (Jim Allen)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

No overall comment.

Burpham: King Post Parade is only half the Local Centre, the other half is London Road Parade.
It is noted that Jacobs Well is missing as a Local Centre from the Plan, as are the proposed Local Centres at Wisley, Gosden Hill and Blackwell Farm.

A provision should be included for any Local Centre in new developments.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** pslp171/2231  **Respondent:** 8581505 / Burpham Neighbourhood Forum (Jim Allen)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

3c King Post Parade, London Road Parade, Aldi. A more defined map is required. The Local Plan and the Neighbourhood Plan conflict with regard to change of use conditions with reference to local centres. Clarification as to the differing requirements needs documenting.

4.4.92a
Note: National definition includes casinos and these need to be ‘excluded’ specifically if this is the intention.

4.4.92f
Insert “Appendix 2 forms part of this policy”. The terms of the Burpham Neighbourhood Plan need to be carried forward in the Local Plan to prevent conflict with town centre policies.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/11207  **Respondent:** 8602337 / Cross Group (Mr Colin Cross)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Policy E9 - Local Centres**

I object to Local Centres being considered for large, inappropriate, developments nearby. Local Centres are rural, not urban and that needs more recognition.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/1264  **Respondent:** 8608865 / WBDRA. (David Bird)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Policy E9 - Local Centres**

I object to Local Centres being considered for large, inappropriate, developments nearby. Local Centres are rural, not urban and that needs more recognition.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
WBDRA SUPPORTS 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:** PSLPP16/9853  **Respondent:** 8627393 / Worpleston Parish Council (Gaynor White)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

| E9 Local Centres | In principle support - Jacobs Well is an existing local centre and will need to be added to the six local centres already listed. |

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** pslp171/2489  **Respondent:** 8627393 / Worpleston Parish Council (Gaynor White)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Support - and welcome the inclusion of Jacobs Well in the list of Local Centres.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/10089  **Respondent:** 8640353 / Julian Cranwell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We object to Policy E9 Local centres We object (for the reasons given under Policy E8 above) to the proposal for retail development adjacent to the 6 rural centres, and sites on the edge of designated centres. This is creeping urbanisation, damaging to the Green Belt and to Guildford town revival as a thriving urban hub. It will contribute to local urban decay and depopulation, just as expansion of the suburbs did to mid-20th century London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/1082  **Respondent:** 8687265 / Dagero Ltd (David Roberts)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

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We object to Policy E9 Local centres We object (for the reasons given under Policy E8 above) to the proposal for retail development adjacent to the 6 rural centres, and sites on the edge of designated centres. This is creeping urbanisation, damaging to the Green Belt and to Guildford town revival as a thriving urban hub. It will contribute to local urban decay and depopulation, just as expansion of the suburbs did to mid-20th century London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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**Comment ID:** PSLPP16/2634  **Respondent:** 8693153 / Vicki Willetts  **Agent:**

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**Comment ID:** PSLPP16/4733  **Respondent:** 8711841 / Rosmarie Roberts-Kunz  **Agent:**

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**Comment ID:** PSLPP16/9067  **Respondent:** 8723809 / Sally Blake  **Agent:**

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16901  Respondent: 8728865 / Neville Bryan  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

No comment

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2365  Respondent: 8806305 / Laurence Cook  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY E9 - Local centres

I OBJECT (for the reasons given under Policy E8 above) to the proposal for retail development adjacent to the 6 rural centres, and sites on the edge of designated centres. This is creeping urbanisation, damaging to the Green Belt and to Guildford town revival as a thriving urban hub. It will contribute to local urban decay and depopulation, just as expansion of the suburbs did to mid-20th century London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2528  Respondent: 8806849 / Roland McKinney  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

I object to this policy.

How can GBC prevent the vacancy rate from increasing? There is a marked shift away from traditional retail, and it has been predicted by the BRC that up to one third of people employed in traditional retail will loose their jobs by 2015. Given this background, how can GBC possibly stop the vacancy rate from rising?

This is a King Canute policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Policy E9 - Local Centres

We have noted that Epsom Road, Merrow appears in the list of 14 existing Local Centres in this policy.

We support this policy which must be interpreted both positively and flexibly to allow these centres to retain financial viability and so that they are not swamped by businesses that are peripheral to the main objectives of providing for everyday shopping and service needs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15775  Respondent: 8836129 / Roger Shapley  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We object to the proposal for retail development adjacent to the 6 rural centres and sites on the edge of designated centres. This is creeping urbanisation, damaging to the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18579  Respondent: 8840449 / David Wilson  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to E8 and E9 to the extent that they will override considerations to preserve the Greenbelt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18190  Respondent: 8843361 / Adrian Atkinson  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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 E9 Local centres

I object (for the reasons given under Policy E8 above) to the proposal for retail development adjacent to the 6 rural centres, and sites on the edge of designated centres. This is creeping urbanisation, damaging to the Green Belt and to Guildford town revival as a thriving urban hub. It will contribute to local urban decay and depopulation, just as expansion of the suburbs did to mid-20th century London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/17786  Respondent: 8858113 / Ramsey Nagaty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Policy E9 Local centres

I object (for the reasons given under Policy E8 above) to the proposal for retail development adjacent to the 6 rural centres, and sites on the edge of designated centres. This is creeping urbanisation, damaging to the Green Belt and to Guildford town revival as a thriving urban hub. It will contribute to local urban decay and depopulation, just as expansion of the suburbs did to mid-20th century London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2432  Respondent: 8858433 / Eric Peters  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy E9 - Local Centres

I object for the same reason as Policy E8 above.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2229  Respondent: 8860897 / Julia Shaw  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

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
I think that neither retail development adjacent to the 6 rural centres is appropriate, nor sites on the edge of designated centres.

I OBJECT (for my reasons given under my Policy E8 response) to the proposal for retail development adjacent to the 6 rural centres, and sites on the edge of designated centres. This is creeping urbanization, damaging to the Green Belt and to Guildford town role as a thriving urban hub. It will contribute to urban decay and depopulation, just as expansion of the suburbs did to mid-20th century London.

This is another Trojan horse policy, allowing retail hubs to be vastly expanded in order to smooth the way for vast new housing estates outside in the countryside (e.g. to meet the “everyday shopping and service needs” of the roughly 1,500 people living in the 600 new homes planned for the Horsleys).

This is a case of back-to-front priorities. Expanded local retail hubs are being proposed in order to justify more house building in the villages, and in a forlorn attempt to mitigate the serious traffic and infrastructure problems this will create. The Council has no business facilitating new supermarkets in the Green Belt. Rural retail capacity should be left to local demand.

The policy proposes not a single measure to support existing rural shops and services that are the lifeblood of village communities, e.g. using business rates and other levers at the Council’s disposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1691  Respondent: 8865697 / Robert Treble  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The designation "retail and other main town centre uses” replaces the previous wording which simply said "retail development”. The term "consistent with the scale and function of that centre” is insufficient protection against inappropriate development and the reference to "other main town centre uses” and the supporting definition of these uses should be removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16978  Respondent: 8893057 / Dianne Garnett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

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 E9 Local centres

1.2  We object (for the reasons given under Policy E8 above) to the proposal for retail development adjacent to the 6 rural centres, and sites on the edge of designated centres. This is creeping urbanisation, damaging to the Green Belt and to Guildford town revival as a thriving urban hub. It will contribute to local urban decay and depopulation, just as expansion of the suburbs did to mid-20th century London.
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/12609</th>
<th>Respondent: 8894657 / Jacob's Well Residents' Association (Janet Smith)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>Sound?</td>
</tr>
<tr>
<td>Jacobs Well would seem to qualify as an existing local centre.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: pslp171/1543</th>
<th>Respondent: 8894657 / Jacob's Well Residents' Association (Janet Smith)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E9</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>Sound?</td>
</tr>
<tr>
<td>THE JWRA are pleased to see that Jacobs Well has been added to the list of rural local centres.</td>
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<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/18575</th>
<th>Respondent: 8896161 / Carol Wilson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>Sound?</td>
</tr>
<tr>
<td>I OBJECT to E8 and E9 to the extent that they will override considerations to preserve the Greenbelt. I object to the idea that additional shops and facilities can be built outside the centre. Horsley centre is big enough. There is nowhere to put extra shops. There is nowhere for extra people to park.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/8161</th>
<th>Respondent: 8902465 / Linda Slater</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>Sound?</td>
</tr>
</tbody>
</table>
I OBJECT TO POLICY E9 (LOCAL CENTRES):

- No need for retail development “adjacent” to rural centres for same reason as Policy E8.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attended documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/9455</th>
<th>Respondent: 8915073 / Alastair Lawson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9</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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</tr>
</tbody>
</table>

4.4.92 ‘Over the plan period, four new Local Centres are planned to be built at each of the strategic sites of Gosden Hill, the former Wisley airfield, Blackwell Farm and Normandy and Flexford. The precise location of each centre will be determined by planning application. Once built, these new local centres will be treated as local centres within the context of this Plan, and subsequently designated as new Local Centres in the next Local Plan review.

Worplesdon Road, Stoughton Ash Vale Parade, Ash The Street, Tongham

I cannot see how these already congested ‘local centres’ can be helped by the addition of attracting more traffic to new centres like Normandy and Flexford. GBC haven shown how infrastructure costs can be met to alleviate the stress already on the sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attended documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/3531</th>
<th>Respondent: 8919521 / Susan Hughes</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9</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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</tr>
</tbody>
</table>

POLICY E9 Local centres OBJECT. I do not think that retail development adjacent to the 6 rural centres is appropriate, nor sites on the edge of designated centres as this leads to creeping urbanisation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attended documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10996</th>
<th>Respondent: 8926401 / Christine Medlow</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9</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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</tr>
</tbody>
</table>

E9 Local Centre
There is no “local centre” to provide the local community in which I live with everyday shopping and service facilities. Perhaps a part of the upper High Street and the adjoining parts of Epsom and London Road could be given a suitable designation to encourage the location of everyday retail and service facilities there.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15152  Respondent: 8926529 / Annie Cross  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy E9 - Local Centres

I object to Local Centres being considered for large, inappropriate, developments nearby. Local Centres are rural, not urban.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/70  Respondent: 8929057 / East Horsley Parish Council (Nick Clemens)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY E9: Local centres

We support this policy, including the designation of Bishopsmead Parade, East Horsley, as a rural Local Centre under the draft Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8782  Respondent: 8933185 / Peter See  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

4.4.92. Policy E9: Local Centres

Objection to a new Local Centre at Normandy and Flexford (and to new housing and a secondary school). See pages 22-25 of this letter.

Page 90 & Page 91 Policy E9: Local Centres
is the boundary: forms the boundary
outside of: outside
4.4.95
is the boundary: forms the boundary
outside of: outside
4.4.97
Page 92 Monitoring Indicators
outside of: outside

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16053  Respondent: 8941761 / FLGCA (Paul Kassell)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Local centres exist to cater for retail needs of the locality. Some of the Local Centres have vacant premises. Under these circumstances it is not appropriate to encourage new developments on the edge of Local Centres, nor does this constitute exceptional circumstances for encroaching into the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9380  Respondent: 8948385 / Gillian Eve  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy E9: Local Centres

I OBJECT to the designation of these sites as Local Centres and the proposal to encourage further retail development on or adjacent to these sites. This is creeping urbanisation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16167  Respondent: 8948385 / Gillian Eve  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the designation of these sites as Local Centres and the proposal to encourage further retail development on or adjacent to these sites. This is creeping urbanisation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2521  Respondent: 8948385 / Gillian Eve  Agent:

Policy E9: Local Centres

I OBJECT to the continued designation of these sites as Local Centres and the proposal to encourage further retail development on or adjacent to these sites. This is creeping urbanisation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Policy E8 & Policy E9

Although not objecting in total to these policies concerning District Centres and rural Local Centres, we have specific concerns. We object to the inclusion of the phrases "and other main town centre use" where it appears in both policies.

The definition of main town centre uses within these policy sections (paras. 4.4.87b and 4.4.92a) include an extremely wide ranging selection of activities, some of which are totally inappropriate to locations such as Station Parade and Bishopmead Parade, East Horsley. Examples include factory outlet centres, casinos, drive-through restaurants and nightclubs. The fact that these uses will be "supported" by Policies E8 and E9 is a concern. The designation "retail and other main town centre uses" replaces the previous wording which simply said "retail development". The term "consistent with the scale and function of that centre" is insufficient protection against inappropriate development and the reference to "other main town centre uses" and the supporting definition of these uses should be removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The University recognises the role that local centres play in providing a focus for everyday shopping and service needs.

The University agrees with the strategy to encourage provision of new homes above ground floor non-residential uses.

The University is broadly supportive of paragraph 4.4.92 of the supporting text to this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
### Policies E8/ E9: District & Local Centres

**Object (not justified in respect of NPPF paragraph 182)**

The Local Plan is unjustified on the basis of the proposed restriction on food takeaways (A5 uses) within 500m of schools. This is unsupported by appropriate evidence and not a reasonable material planning consideration. There does not appear to be any evidence base to support this, and no explanation is included within the reasoned justification. The same policy provision is also included within Policy E7 with respect to Guildford Town Centre, again without justification.

To place the policy into a practical context, at the Wisley new settlement, the Concept Masterplan (Appendix 2) includes a local centre (which may include A5 uses) adjacent to the proposed primary and secondary school site. There are design, transport and sustainability reasons to support this co-location. As read, this proposal would be in conflict with emerging policies E8 and E9. Indeed, it is best practice to provide critical mass at local centres to not only create a sustainable place but also to make the proposals viable.

As a separate point, WPI supports the proposed designation of a local centre at the Wisley new settlement, as outlined in paragraph 4.4.92.

**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)

---

**Comment ID:** PSLPP16/14957  **Respondent:** 9327009 / sp2 Consulting Limited (Stephen Parker)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT. I do not think that retail development adjacent to the 6 rural centres is appropriate, nor sites on the edge of designated centres.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** pslp171/2637  **Respondent:** 9335041 / David Reeve  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy E9

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**OBJECT (on 2 distinct grounds)**

1. For this Policy, which includes Bishopsmead Parade in East Horsley, the same objection applies as that stated for Policy E8. At least paragraph 5 of this Policy states that the main town centre uses must be “consistent with the scale and function of [the] centre”. Even so, it would be far better to review the list of main town centre uses, and then explicitly identify the acceptable subset of those uses – though in Bishopsmead Parade I suspect that the subset might be quite small.
2. Paragraph 4.4.96 suggests that a “reasonably flexible approach to ground floor main town centre uses” would be appropriate. However, that is not sufficiently specific in planning terms and again fails to comply with NPPF paragraph 154.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5874  Respondent: 9412065 / Stephen Bray  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY E9 – Rural Centres

I question that West Horsley is not nominated as a rural local centre, certainly it has the capacity to be so if a sufficiently sustainable development plan is in place as per the comments I have made elsewhere in this consultation response.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8231  Respondent: 10662849 / Garry Walton  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY E9 – Local centres

I OBJECT (for the reasons given under Policy E8 above) to the proposal for retail development adjacent to the 6 rural centres, and sites on the edge of designated centres. This is creeping urbanization, damaging to the Green Belt and to Guildford town role as a thriving urban hub. It will contribute to urban decay and depopulation, just as expansion of the suburbs did to mid-20th century London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1785  Respondent: 10776225 / Roger Main  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy E9 – Rural Centres

I OBJECT. The same reasoning applies as for District Centres – there is no local demand for additional shopping facilities and the infrastructure cannot cope with increased numbers from outside.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/1399</th>
<th>Respondent: 10780961 / Hillary Ingle</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9</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>

We have not been told what the retail space will consist of.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/13704</th>
<th>Respondent: 10782625 / Heather Alexander</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9</td>
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</tr>
</tbody>
</table>

I OBJECT TO POLICY E9 (LOCAL CENTRES):

- No need for retail development “adjacent” to rural centres for same reason as Policy E8.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/846</th>
<th>Respondent: 10798049 / Steve &amp; Maureen Knight</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9</td>
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</tbody>
</table>

The fact that Jacobs Well is a local centre has been omitted and should be added to plan

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/340</th>
<th>Respondent: 10799169 / Neal Basson</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9</td>
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<td></td>
<td></td>
</tr>
</tbody>
</table>
POLICY E9 Local centres

OBJECT We do not think that retail development adjacent to the 6 rural centres is appropriate, nor sites on the edge of designated centres.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18386  Respondent: 10799169 / Neal Basson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

OBJECT We do not think that retail development adjacent to the 6 rural centres is appropriate, nor sites on the edge of designated centres.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17537  Respondent: 10799425 / Guildford Greenbelt Group (Susan Parker)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We object to Policy E9 Local centres

We object (for the reasons given under Policy E8 above) to the proposal for retail development adjacent to the 6 rural centres, and sites on the edge of designated centres. This is creeping urbanisation, damaging to the Green Belt and to Guildford town revival as a thriving urban hub. It will contribute to local urban decay and depopulation, just as expansion of the suburbs did to mid-20th century London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/829  Respondent: 10804961 / M. Basson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

OBJECT We do not think that retail development adjacent to the 6 rural centres is appropriate, nor sites on the edge of designated centres.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/6644  Respondent: 10829121 / Julie Brown  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to POLICY E9 - Local centres
- No need for retail development “adjacent” to rural centres for same reason as Policy E8.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/3481  Respondent: 10843361 / Natalie Brown  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to POLICY E9 - Local centres
- No need for retail development “adjacent” to rural centres for same reason as Policy E8.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/14479  Respondent: 10846625 / Frank Drennan  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9
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 E9 “Local centres” on the grounds that;
1.2 (for the reasons given under Policy E8 above) to the proposal for retail development adjacent to the 6 rural centres, and sites on the edge of designated centres. This is creeping urbanisation, damaging to the Green Belt and to Guildford town revival as a thriving urban hub. It will contribute to local urban decay and depopulation, just as expansion of the suburbs did to mid-20th century London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/8865  Respondent: 10857889 / William Kyte OBE  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/18604</th>
<th>Respondent: 10858977 / Angela Otterson</th>
<th>Agent:</th>
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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 to this policy</td>
<td></td>
</tr>
<tr>
<td>I think that retail development adjacent to the six rural centres should be small and in keeping with the local character and scale.</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>Attached documents:</td>
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<table>
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<tr>
<th>Comment ID: PSLPP16/16427</th>
<th>Respondent: 10876033 / Lucie Paulson</th>
<th>Agent:</th>
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<tr>
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<tr>
<th>Comment ID: PSLPP16/18140</th>
<th>Respondent: 10910273 / Lynda M Williams</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</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 policy E9</td>
<td></td>
</tr>
<tr>
<td>- no need for district retail hubs adjacent to rural areas. People live there because they do not want retail hubs next to them.</td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
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<td>Attached documents:</td>
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We support this policy, including the designation of Bishopsmead Parade, East Horsley, as a rural Local Centre under the draft Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/1690  
**Respondent:** 10933857 / C J Tilbury  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY E9 - Local centres

I OBJECT (for the reasons given under Policy E8 above) to the proposal for retail development adjacent to the 6 rural centres, and sites on the edge of designated centres. This is creeping urbanisation, damaging to the Green Belt and to Guildford town revival as a thriving urban hub. It will contribute to local urban decay and depopulation, just as expansion of the suburbs did to mid-20th century London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15375  
**Respondent:** 10935201 / Cathryn Walton  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT (for the reasons given under Policy E8 above) to the proposal for retail development adjacent to the 6 rural centres, and sites on the edge of designated centres. This is creeping urbanization, damaging to the Green Belt and to Guildford town role as a thriving urban hub. It will contribute to urban decay and depopulation, just as expansion of the suburbs did to mid-20th century London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9212  
**Respondent:** 10985057 / Anthony Parker  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY E9 Local centres – I OBJECT. I do not think that retail development adjacent to the 6 rural centres is appropriate, nor sites on the edge of designated centres.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2460  
**Respondent:** 11014881 / Linda Peters-Smith  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Policy E9 - Local Centres

I object for the same reason as Policy E8 above.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 11033921 / Tim Depledge</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9</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 - Again written by someone who has not been to Bishopsmead Parade, East Horsley ...</td>
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<th>Comment ID: PSLPP16/16519</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>The policy is an extension of E9 and is also an attempt to use an extension of rural local retail development as an excuse for changing the countryside in contravention of the NPPF provisions.</td>
</tr>
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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: pslp171/256</th>
<th>Respondent: 11051521 / J and M Baylis</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>
<td>Policy E9 (10) includes a new statement on marketing (12 months etc.). Why is there no similar statement in E8?</td>
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<th>Comment ID: PSLPP16/8838</th>
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**POLICY E9 (LOCAL CENTRES)** – I object. See my comments on E8 above. Extending retailing to areas “adjacent” to rural centres is a Trojan Horse for indiscriminate development generally.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/4772  **Respondent:** 15084897 / Save Send Action Group (Andrew Procter)  **Agent:**

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26 POLICY E9

26.1 I object to Policy E9 Local centres

26.2 I object (for the reasons given under Policy E8 above) to the proposal for retail development adjacent to the 6 rural centres, and sites on the edge of designated centres. This is creeping urbanisation, damaging to the Green Belt and to Guildford town revival as a thriving urban hub. It will contribute to local urban decay and depopulation, just as expansion of the suburbs did to mid-20th century London.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/8938  **Respondent:** 15107297 / Ian McQuattie  **Agent:**

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I OBJECT TO POLICY E9 (LOCAL CENTRES):

- No need for retail development “adjacent” to rural centres for same reason as Policy E8.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/13749  **Respondent:** 15227905 / Nigel Alexander  **Agent:**

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I OBJECT TO POLICY E9 (LOCAL CENTRES):

• No need for retail development “adjacent” to rural centres for same reason as Policy E8.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1746  Respondent: 15244641 / Wesley Raynbird-Tilbury  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY E9 - Local centres

I OBJECT (for the reasons given under Policy E8 above) to the proposal for retail development adjacent to the 6 rural centres, and sites on the edge of designated centres. This is creeping urbanisation, damaging to the Green Belt and to Guildford town revival as a thriving urban hub. It will contribute to local urban decay and depopulation, just as expansion of the suburbs did to mid-20th century London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1810  Respondent: 15247265 / Aileen Aitcheson  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY E9: Local centres

I support this policy, including the designation of Bishopsmead Parade, East Horsley, as a rural Local Centre under the draft Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1834  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 E9: Local centres

I support this policy, including the designation of Bishopsmead Parade, East Horsley, as a rural Local Centre under the draft Local Plan.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attended documents:

Comment ID: PSLPP16/2492  Respondent:  15282433 / Kentucky Fried Chicken (GB) Limited (Chris Holmes)
Agent: SSA Planning Limited (Steve Simms)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( No ), is Legally Compliant? ( Yes )

POSITIVELY PREPARED

The draft policy is not based on any objectively assessed development requirement. It effectively assesses the requirement for hot food takeaways within 500 metres of the boundary of a school as zero, but does so without evidence of either a link between the incidence of obesity and the proximity of hot food takeaways to such places or any particular distance at which that link is demonstrated. Consequently, the development requirement has not been objectively assessed.

In fact, the distance chosen could have the effect of banning hot food takeaways from a majority of the Borough. No assessment has been made of the number of hot food takeaways that might be refused as a result of this or what the social, economic or environmental impacts of that might be, so it is not possible to balance these impacts.

The policy is negative in its assumptions, using the concept of ‘unhealthy food’, which is at best unhelpful in isolation from an understanding of the person eating the food, their health and lifestyle, and at worst is simply subjective. Furthermore, it assumes all hot food takeaways offer little choice and serve the same type and standard of food.

We are further of the view that food of high energy density or poor nutritional value is sold from and at a range of premises within a variety of other classes, including many in Class A1, such as coffee or sandwich shops, bakeries or, simply, supermarkets, and that focussing on Class A5 uses is both unhelpful and unfair.

JUSTIFIED

There is no evidence for a causal link between the incidence of obesity and proximity of hot food takeaways to schools and only limited evidence of any correlation at all, so it is unclear how refusing planning permission for hot food takeaways within 500 metres of such locations could ever be justified.

The inclusion of primary schools is particularly problematic, as it is clear that children at primary schools are not usually permitted to leave the premises at lunchtime and, given their age, are unlikely to travel to or from school unaccompanied. Outside school time, children’s diets are quite properly the responsibility their parents or guardians.

Consequently, it is far from clear how refusing planning permission for hot food takeaways within 500 metres of primary schools could ever be justified. This was the view taken by a Planning Inspector in an appeal (APP/P4415/A/11/2159082) against refusal of a restaurant and hot food takeaway in January 2012.

The Evidence Base contains no evidence of any threshold number of hot food takeaways at which the harm that the draft policy seeks to mitigate occurs or is noticeably greater, nor any threshold distance. Indeed, there is no evidence of a causal spatial link between clusters of hot food and the incidence of obesity or overweight at all.

It is better to rely on objective evidence in a retail study to set maximum proportions of hot food takeaways. Whilst these are primarily directed at protecting the retail health of designated centres, there is scope to widen their application to support the retail health of retail provision outside centres, such as standalone or parade units.
As it is usually impractical to apply a maximum frontage proportion outside centres, the 500-metre walk distance might be applied, within which the proportion (rather than number) of units, be they in- or out-of-centre, used as hot food takeaways would not be permitted to exceed the same threshold as set for centres.

In adopting such an approach, it would be preferable to consider optimal proportions of all retail uses that could contribute to healthy centres or to a healthy offer generally, whether in- or out-of-centre, instead of focussing on particular uses considered to be a problem, apparently for wider social reasons unrelated to retail planning.

On a practical point, there is a significant difficulty in using distance radii in that it takes no account of real barriers, physical or perceptual, so that premises on the other side of a line feature such as a canal or busy road could be affected despite in reality being more than a 500m walk away. It is far better to use real walk isochrones.

**EFFECTIVE**

For the reasons set out, it is unclear how refusing permission for hot food takeaways within 500 metres of primary schools could ever be effective.

Some hot food takeaways, together with restaurants, pubs and shops are clearly a source of cheap, energy dense and nutrient poor foods, however, not all hot food takeaways, restaurants, pubs and shops are, and the planning system is ineffective in distinguishing between those that are and those that are not.

The area that would be affected by the policy could cover a large and variable part of the Borough, so it is hard to see how the effectiveness of its extent could be monitored. Would poor or negative achievement against objectives result in reduction or expansion of the zones? What other corrective action might be taken short of its withdrawal?

Diet is clearly a key determinant both of general health and obesity levels. Exercise is the other key determinant and must be considered for a complete picture. Focussing on improving access to open space, sport and recreation facilities would be a far more effective strategy for reducing childhood obesity.

**CONSISTENT WITH NATIONAL POLICY**

We consider that no regard has been given to national policy and advice in preparing Policy E9 because no National Planning Policy Framework (NPPF) policies deal with dietary issues.

Specifically, taking into account proximity of hot food takeaways to schools has no basis in national policy and national practice guidance simply refers to a briefing paper containing case studies on the issue. Indeed, restricting accessibility to services and facilities is directly contrary to national policy.

The NPPF recognises the role planning takes in better enabling people to live healthier lifestyles. However, it seeks to do this by creating, not restricting choice, by increasing access to recreation and health services, and by ensuring developments are within walkable distances of local facilities and public transport to other facilities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp171/1155  **Respondent:** 15282433 / Kentucky Fried Chicken (GB) Limited (Chris Holmes)  
**Agent:** SSA Planning Limited (Steve Simms)  
**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy E9  
**Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( No ), is Legally Compliant? ( Yes )**
Whilst we support additional clarity, we consider that food of high energy density or poor nutritional value is sold from and at a range of premises within a variety of other classes, including many in Class A1, such as coffee or sandwich shops, bakeries or, simply, supermarkets, and that focusing on Class A5 uses is both unhelpful and unfair.

We are also unclear why Class A5 has been specified in respect of policies E8 and E9, but not in respect of policy E7.

We maintain our objection to section (7) of policy E9.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Deletion of section (7) of policy E9.

Attached documents:

---

I OBJECT TO POLICY E9 (LOCAL CENTRES):

• No need for retail development “adjacent” to rural centres for same reason as Policy E8.

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 E9 - Local centres
• No need for retail development “adjacent” to rural centres for same reason as Policy E8.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3319  Respondent: 15327905 / Julia Cook  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY E9 - Local centres

I OBJECT (for the reasons given under Policy E8 above) to the proposal for retail development adjacent to the 6 rural centres, and sites on the edge of designated centres. This is creeping urbanisation, damaging to the Green Belt and to Guildford town revival as a thriving urban hub. It will contribute to local urban decay and depopulation, just as expansion of the suburbs did to mid-20th century London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4830  Respondent: 15377953 / cctvtraining.com ltd (Gordon Tyerman)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY E9 Local centres

GROUND FOR OBJECTION We do not think that retail development adjacent to the 6 rural centres is appropriate., nor sites on the edge of designated centres.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6747  Respondent: 15437889 / Janet Smith  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Local Centres Jacobs Well would seem to qualify as an existing local centre.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/6792  Respondent: 15438945 / Jacqueline Davies  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to POLICY E9 - Local centres

• No need for retail development “adjacent” to rural centres for same reason as Policy E8.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14374  Respondent: 15446401 / Louise Yandle  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7640  Respondent: 15450817 / Audrey Gachen  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9
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: PSLPP16/8440  Respondent: 15466177 / D.L. + E.J. Wilkinson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY E9 (LOCAL CENTRES):
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<td>Anne Geary</td>
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<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy E9</td>
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I support this policy, including the designation of Bishopsmead Parade, East Horsley, as a rural Local Centre under the draft Local Plan.

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<td>Kirstie Pankhurst</td>
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<td>Neil Higgins</td>
<td></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy E9</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
</tbody>
</table>

* I object to a Local Plan which seeks to urbanise rural centres by allowing for retail development within their scope

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

<table>
<thead>
<tr>
<th>Comment ID</th>
<th>Respondent</th>
<th>Agent</th>
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<tr>
<td>PSLPP16/10045</td>
<td>Gerard Duvé</td>
<td></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy E9</td>
<td>Yes</td>
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<td>Yes</td>
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</table>
Local Centres

I object to Local Centres being considered for large, inappropriate, developments nearby. Local Centres are rural, not urban.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11084  Respondent: 15509057 / Richard Golding  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT (for the reasons given under Policy E8 above) to the proposal for retail development adjacent to the 6 rural centres, and sites on the edge of designated centres. This is creeping urbanisation, damaging to the Green Belt and to Guildford town revival as a thriving urban hub. It will contribute to local urban decay and depopulation, just as expansion of the suburbs did to mid-20th century London. In Send since the turn of the century four shops have gone from the village, Chemist, shoe shop and a electrical contractor supplier, these have been demolished and replaced by offices and residential, where the local post office and general provision store has been converted in residential use.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11278  Respondent: 15570145 / Owen Eszeki  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy E9 - Local Centres

I object to Local Centres being considered for large, inappropriate, developments nearby. Local Centres are rural, not urban.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11277  Respondent: 15570209 / Emily Cross  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy E9 - Local Centres
I object to Local Centres being considered for large, inappropriate, developments nearby. Local Centres are rural, not urban.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11456  Respondent: 15571425 / Monika Neczaj  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY E9 (LOCAL CENTRES):

• No need for retail development “adjacent” to rural centres for same reason as Policy E8.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16278  Respondent: 15603361 / Ann Watkins  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY E9 (LOCAL CENTRES): • No need for retail development “adjacent” to rural centres for same reason as Policy E8.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15417  Respondent: 15614497 / Hannah Yandle  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY E9 (LOCAL CENTRES):
• No need for retail development “adjacent” to rural centres for same reason as Policy E8.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15675  Respondent: 15618881 / Jayne Barmby  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT (for the reasons given under Policy E8 above) to the proposal for retail development adjacent to the 6 rural centres, and sites on the edge of designated centres. This is creeping urbanisation, damaging to the Green Belt and to Guildford town revival as a thriving urban hub. It will contribute to local urban decay and de-population, just as expansion of the suburbs did to mid-20th century London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15708  Respondent: 15619041 / Jack Cross  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy E9 - Local Centres

I object to Local Centres being considered to provide large, inappropriate, developments nearby.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16342  Respondent: 15640897 / Jackie van Heesewijk  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY E9 (LOCAL CENTRES): • No need for retail development “adjacent” to rural centres for same reason as Policy E8.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18550  Respondent: 15697665 / Campaign for Real Ale (Mick Bell)  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Guildford Borough Local Plan – Proposed Submission Local Plan: strategy sites 2016

I am writing on behalf of the Surrey/Hants Borders Branch of CAMRA, the Campaign for Real Ale, in relation to the above consultation.
As you would expect, CAMRA’s chief concern is that the Local Plan will afford suitable protection, in planning terms, for public houses. The continuing loss of traditional pubs, both in urban and rural settings, is in our view having a very negative effect on the communities concerned. The planning system affords a potentially powerful line of defence against the efforts of some pub owners to make short-term financial gains at the expense of valuable community facilities. Our hope would be that the Local Plan will include policies which support the retention of community assets like pubs and resist applications for change of use unless there is very clear evidence that the facility is no longer wanted or needed.

I am also pleased to note that Policy E5, contains a specific mention of public houses in terms of businesses that will be supported for retention in rural areas. I would agree that pubs they often essential in maintaining the local economy in rural villages. However, this can equally apply in urban areas, such as for example the suburbs of Guildford, where whole communities often have a single pub to act as the focus of the community. I would therefore like to see this policy extended to cover all communities, not just rural areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/342  Respondent: 17267393 / Steve Knight  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am pleased to see that Jacobs Well has been added to the list of rural local centres.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/357  Respondent: 17267745 / Maureen Knight  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am pleased to see that Jacobs Well has been added to the list of rural local centres.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1003  Respondent: 17324385 / Sainsbury's Supermarkets Ltd. (sir or Madam)  Agent: White Young Green Planning (Gary Morris)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
On behalf of our client, Sainsbury’s Supermarkets Ltd, we have considered the above document and at this stage we would like to make comments in respect of the Retail Impact Assessment threshold outlined within Policies E7, E8 and E9.

These policies state that retail and leisure proposals over 500 sq m (gross) located outside of Guildford town centre, local or district centres, and where the site is not allocated, must be supported by a retail impact assessment.

The National Planning Policy Framework (NPPF) provides that Local Planning Authorities can set local thresholds above which proposals for town centre uses outside of town centres should be subject to an impact assessment. National Planning Practice Guidance provides clarification around the setting of local thresholds for retail impact. It states: “In setting a locally appropriate threshold it will be important to consider the:

• scale of proposals relative to town centres • the existing viability and vitality of town centres

• cumulative effects of recent developments • whether local town centres are vulnerable

• likely effects of development on any town centre strategy

• impact on any other planned investment” The impact threshold is supported by recommendations made within the Retail and Leisure Study Update 2014 prepared by Carter Jonas, however we note that this report considers that the district and local centres are mainly reliant on convenience goods shopping (9.22) and that the main food store anchors are important generators of linked trips. We also note that Carter Jonas do not identify any capacity for new convenience space for the time being. At para 9.23, Carter Jonas state that ‘in general terms, national retailers… have requirements for units of 500sqm gross and above.’ and that ‘stores with floorspace over 500sqm gross are unlikely to be a purely local facility and will tend to draw from outside of their immediate local catchment’. We consider that these statements are too general and, indeed, not correct. Sainsbury’s, for example, operates over 700 “Sainsbury’s Local” stores the majority of which have a floor area of under 500sqm – and this remains a key element of their ongoing requirements across the Country. Some Sainsbury’s Local stores have floorspace over 500sqm – but still cater to a local market. Whilst we acknowledge that the capacity assessment in the report suggests limited capacity in the coming years, we can see no evidence to suggest that there is a case for lowering the threshold to 500sqm gross. Indeed, we consider that a threshold as low as 500sqm would unduly stifle the convenience retail market and would deprive locations of valuable local facilities that are just as likely (if not more likely) to compete with out of town supermarkets as they are with town and district centres.

Carter Jonas later go on to suggest that a floorspace threshold below 500sqm would be too inflexible, but we would suggest that even 500sqm is too inflexible – particularly without any caveat on the locations where such an assessment would be required.

On the basis of the above, we object to the proposal to lower the threshold to 500sqm gross as there is insufficient evidence to support such a low threshold and because it would unduly restrict and stifle a competitive, but locally focussed, convenience retail market.

We request that we be kept fully informed of any further changes to the Local Plan and all other future LDF documents produced for consultation. In the meantime please please do not hesitate to contact us should you have any queries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Total records: 112.
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

Document part: Policy D1 - Place shaping
**Policy D1: Making better places**

There is much to be welcomed in this policy and text.

4.5.5 and 3.5.6 We need a Local Plan Development Management Policies Document urgently. We will be vulnerable without development control and design policies in place. Can relevant policies in the 2003 Plan be saved, at least to fill the gap?

The policy to “provide convenient and safe routes through the development and to nearby areas for pedestrians and cyclists” is particularly welcome given experience of developers failing to provide this.

We warmly welcome the addition of promoting green approaches to 4.5.8 which reads “The relationship of the built environment to the landscape must be taken into account and the transition from urban to rural character will need to be reflected in the design of new development with the green approaches to settlements respected.”

However, this approach should go beyond respecting to promoting. We propose that green approaches – both soft green edges to settlements and greenery along roads into settlements - are such a valued, distinctive feature of Guildford that this should be in the policy itself to guide developers. For example, “green approaches to settlements and” could be inserted after “with” in the following:

“All developments will:…promote and reinforce local distinctiveness to create a sense of place, with [green approaches to settlements and] innovative architecture encouraged and supported in the appropriate context.” We suggest “and supported” is superfluous.

Green approaches to settlements are just as important as innovative architecture in Guildford. Promoting green approaches is a dynamic concept not a brake on development. It affects how you do things and applies equally well to the design of settlement extensions and to managing change in established areas. We rely so heavily on green approaches to shape change for the better at inquiries and when responding to applications. It will become more important during a period of growth if we want to retain the qualities that distinguish Guildford and prevent it being a “could be anywhere” town.

**Monitoring Indicators**

Again we are concerned to avoid perverse consequences, with the possibility of reluctance to refuse due to poor design to avoid the risk of unsuccessful appeals.

Object: seeking improvements

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
We oppose the proposed deletion of the last paragraph of D1. Getting design and character right in larger schemes will be as important for the economy of Guildford as broadband.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1863  Respondent: 8561377 / The Guildford Society (Julian Lyon)  Agent:

D1 – Making better places

nnnn) The title to Policy D1 has been amended from ‘Making better places’ to ‘Place Shaping’. This seems to be a positive step inasmuch as the policies have been tightened up, but there must also be a recognition of the scope for major regeneration to transform areas and this would be properly described as Place Making. We would like to suggest this heading be ‘Place Making and Place Shaping’

oooo) At 4.5.1 there is an amendment from ‘urban areas’ to ‘settlements’ which we agree with as the original was too restrictive. We are concerned, however, that the Settlement Profiles Report is so poor that it provides little or no support to this policy and the character assessments are hopelessly out of date.

pppp) The Settlement Profiles Report lets down the Guildford Urban Area the most as it comprises a facile agglomeration of the entire urban area – more than 50% of the residents in the Borough – into a collection of general comments that do not ring true for any Residents Association area or even for the Town Centre.

qqqq) We approve of the strengthening of Policy D1(1) with the use of ‘must’ but we disagree with the substitution in Policy D1(2) of ‘must’ with ‘should’.

rrrr) We agree with the introduction of Policy D1(2)(e).

ssss) We are concerned about the deletion of the section of Policy D1 that commences ‘All developments will...’ and paragraph 4.5.8, which have largely been moved to Policy D4. This deals with new development which, on the face of it, seems more appropriate, but our concern remains that this does not cover changes of use and may not cover refurbishments. We would like to see some safeguards, perhaps by including such works in a definition of new development at Policy D4.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17433  Respondent: 8563201 / West Horsley Parish Council (Sam Pinder)  Agent:

D1 – Making better places
Report page: 15

WHPC view: Supports

In brief: Only for sites adjoining or closely related to a defined rural settlement

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17473  Respondent: 8563201 / West Horsley Parish Council (Sam Pinder)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY D1: Making better places

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: PSLPP16/2195  Respondent: 8570273 / Fiona Curtis  Agent: Fiona Curtis

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

I object to Policy D1 Making better places

I would support this if this were about regeneration which is what it should be about. Instead GBC would like us to think that building 3 sites of approx 2000 homes and two of approx 1000 can be considered 'better places than the countryside they currently occupy? The only site of the 5 that I would support as a form of regeneration is Slyfield.

The monitoring indicator might be better served to take on board the number of objections based on poor design rather than appeals?

I am pleased to see a policy that acknowledges older people in Guildford but I am concerned about the blurring between urban and rural living and design. It is not appropriate to create better living spaces in town at the expense of villages whose character and quality of life is being eroded due to coalescence and traffic. Better places is not just about bricks and mortar, it must allow village life to remain just that and not become urbanised. The policy is one-sided and narrow, it does not take on board the many aspects of life that create 'better places', but instead concentrates on the appearance of buildings. I believe this is a good start but this policy needs developing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2379  Respondent: 8570273 / Fiona Curtis  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. We require All new developments **must** to achieve high quality design and enhance the environment in which they are set.  
   If only the same direct statements were made throughout. There are still too many statements of intent without a real outcome in this plan.  
   **Support**

2. Residential developments of 25 or more dwellings **should**:  
   This is an example of a direction that has been diluted, to ensure directions are followed, **MUST** is stronger than 'should'.  
   **Object**

Key evidence  
Removal of NPPF  
NPPF has been removed, but should be included -- see paragraphs 56--68 of NPPF which outlines the importance of good design not only for the building itself but also for its surroundings.  
**Object**

GBC's Landscape Character Assessment has been included, this should also include any independent work relating to design / assessment ie Richard Bate's assessment of Blackwell Farm landscape and those submitted by GSoc / Guildford Vision Group and other Resident's groups / parish Councils and experts (Bibhas Neogi).  
**Object**

Monitoring Indicators  
Built for Life is helpful but this does not account for the setting or the appropriateness of the development within the setting. It is therefore useful to leave information relating to previous applications, which will have this additional information.  
**Object**

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/13051  **Respondent:** 8573793 / Harry Eve  **Agent:**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

79. This policy is all very well in relation to new developments but **the Plan overall will not make Guildford a better place** – quite the opposite. A major constraint on the housing number is needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
<table>
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<tr>
<th>Comment ID: pslp171/1700</th>
<th>Respondent: 8573793 / Harry Eve</th>
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<tr>
<td>The inclusion of landscape in 4.5.1 is good but I object to the weakening of the policy wording and the removal of paragraph 4.5.8.</td>
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<tr>
<th>Comment ID: PSLPP16/7019</th>
<th>Respondent: 8575617 / Effingham Parish Council (Ian Symes)</th>
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<td>D1 Design– Making places better</td>
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<tr>
<th>Comment ID: PSLPP16/17330</th>
<th>Respondent: 8579649 / Home Builders Federation (Mr James Stevens)</th>
<th>Agent:</th>
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<tr>
<td>The part of the policy relating to Building for Life 12 is unsound because it is unjustified.</td>
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<tr>
<td>The policy requires applicants to demonstrate how they have had regard to Building for Life 12 (BfL12) and that they must show that they have performed positively against this. This is a condition of planning permission. This is unsound because it is unjustified. BfL12 was devised by the HBF and others as a tool to assist developers in helping to create better designed schemes. It was never intended to operate as a mandatory development management tool. BfL12 does not work as a scoring system since it is a collection of guiding principles. The Council can refer to BfL12 in the supporting text but it cannot make this a requirement of local policy.</td>
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| Comment ID: PSLPP16/17564 | Respondent: 8581505 / Burpham Neighbourhood Forum (Jim Allen) | Agent: |
Residential developments ‘of 25 or more dwellings’ fail to make mention of suitable space ‘off road’ for parking of all vehicles.

The ‘over 25 homes sites’ are all some distance from the main employment centres. As there can be no provision for multi location destination public transport, personal transport is a must to get to work.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** pslp171/2233  **Respondent:** 8581505 / Burpham Neighbourhood Forum (Jim Allen)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy D1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

Place shaping: This is not a good title as it implies coercion.

*Policy D1*

*Sub section (2)* should contain “must” as opposed to “should”.

A statement should be inserted stating that the terms of adopted Neighbourhood Plans must be complied with.

Furthermore there is a need for an air impact assessment policy.

4.5.8

Should be retained.

Key Evidence: some documents are out of date. E.g. the Residential Design Guide SPG evidence reference document.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPP16/8078  **Respondent:** 8587489 / University of Surrey (Malcolm Parry)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

Design Policies: I am fully supportive of Design Policies D1 “Making better places”, D2 Sustainable design, construction and energy” and D3 “Historic Environment”.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPP16/2113  **Respondent:** 8591041 / Surrey Wildlife Trust (Mike Waite)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

Design Policies: I am fully supportive of Design Policies D1 “Making better places”, D2 Sustainable design, construction and energy” and D3 “Historic Environment”.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
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Policy D1: Making better places.

Developments should include sufficient open recreational spaces proportionate to their overall size and scale. These open spaces should be designed and managed to support biodiversity alongside their sometimes other primary uses. Useful guidance on ensuring relative sufficiency is Natural England’s Access to Natural Greenspace Standard (ANGSt) and your monitoring of Policy D1 could therefore usefully incorporate the achievement of ANGSt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/18615</th>
<th>Respondent: 8591329 / The House of Commons (Anne Milton MP)</th>
<th>Agent:</th>
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A town proud of its heritage and economic contribution should be building to the very highest design standards. I continue to be dismayed that whilst we have long and necessary arguments about the principle of building we fail to concentrate on the design of those buildings.

A town with so many constraints should not shy away from dense housing development. The often falsely accepted wisdom is that high density means poor development when the opposite can be true. Where we do have brownfield sites they should be used to the maximum: with good design, evidence shows the end result can be far more attractive, in keeping with the local environment and reduce the need for building in more sensitive areas and without taking the easy option of building upwards.

To ensure that the Local Plan isn’t a static document, design of our built environment should include the ability to gather information about how people's lives could be improved: noise, footfall, humidity, air quality, traffic congestion and where people go for their leisure time.

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: pslp171/3495</th>
<th>Respondent: 8591329 / The House of Commons (Anne Milton MP)</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

4.5.8a – The addition of this paragraph on broadband echoes the efforts I have made over a long period to help constituents in no-spots, some of them in surprisingly urban areas. It is crucial that any land required for base stations or other communications equipment is safeguarded

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/1630</th>
<th>Respondent: 8597761 / Mrs Pippa Fleming</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1</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>Objections to the 2016 Local Plan</td>
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<tr>
<td>Following the approval of the revised Local Plan by the full council of Guildford Borough Council on 24th May, I would like to make it clear that I object to the provisions set out in the Local Plan as they threaten to destroy the established nature and identity of our villages by building on Green Belt land and will add considerably to the already unacceptable levels of traffic on the A3, A247 and M25 and any other roads in the borough.</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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<tr>
<th>Comment ID: PSLPP16/8017</th>
<th>Respondent: 8599201 / Richard D Jarvis</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1</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>1. I am writing to object to the scale of development proposed for Guildford in the PSLP. While wanting the town to be successful and vibrant, this should not be achieved at the expense of sacrificing the character of the town and its surrounding countryside. I endorse the submission made by Guildford Residents Association.</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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<tr>
<th>Comment ID: PSLPP16/11209</th>
<th>Respondent: 8602337 / Cross Group (Mr Colin Cross)</th>
<th>Agent:</th>
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<tr>
<td>Policy D1 - Making Better Places</td>
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<tr>
<td>I object to GBC not listening to their residents, who know better than GBC what is needed to make their areas better places, as the last consultation clearly showed.</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: PSLPP16/9095</th>
<th>Respondent: 8609377 / Mr Andy White</th>
<th>Agent:</th>
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<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>
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</tbody>
</table>
To make new developments better places to live in all residents should be provided with appropriate levels of off street/on curtilage parking areas/garages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9854  Respondent: 8627393 / Worpsdon Parish Council (Gaynor White)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

D1 Making Better Places  Support subject to a reduction in the threshold to 10 residential dwellings.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10091  Respondent: 8640353 / Julian Cranwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We object to Policy D1 Making better places.We object to the absence of any reference to vernacular or historic design guidelines, even in Conservation Areas. Most of the borough, especially the rural areas, has vernacular design guidelines that are available to give suggestions as to appropriate design. These should have mandatory planning force. The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design? Should it not result in better-designed buildings?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5227  Respondent: 8655233 / Kay Mackay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I strongly object to development plans that are not necessary and have not taken into account the affect it will have on small villages, that will ruin the village structure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/1412  Respondent: 8671969 / Valerie Thompson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

D1 Making Better Places

I object to the fact that GBC has not referred in its documents to any consideration of vernacular styles, or materials in the preservation of the surroundings of historic, or even listed houses, even in existing Conservation areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/54  Respondent: 8671969 / Valerie Thompson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy D1 Place Shaping

I object to 4.5.8 which formerly was a reference to development, responding to local character, history or vernacular architecture. This direction has been removed, indeed GBC appear to be encouraging unsuitable modern buildings in sensitive sites.

GBC have removed all reference to sensitive development, including being aware of and noting the characteristics of an area, constraints such as hedges and trees, and local distinctiveness.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15202  Respondent: 8672993 / Kes Heffer  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

This policy is endorsed, but safeguards to make sure that high quality traditional building in keeping with surroundings is strictly enforced need to be included. There is a lot of motherhood and apple pie in the sentiments of the current statements in Policy D1, which are also occasionally conflicting: e.g. the Blairite, ‘third-way’ fudge: ‘reflecting the identity of its surroundings whilst allowing for innovative and forward thinking design’ (paragraph 4.5.8). That just allows a gigantic loophole for developers to jump through. Also it is not clear how the emphasis of the Draft Local Plan on development in rural villages can possibly aid the stated objective: ‘to facilitate and promote walking, providing a high quality environment for pedestrians, and where possible allowing short walking distances to amenities’; employment and major amenities will generally not exist within short walking distances of rural villages. Those moving to proposed new houses in the rural villages (existing or proposed at Wisley airfield) will mostly have jobs elsewhere, and quite likely children will go to schools elsewhere. Car use can only increase under the assumptions of the Draft Local Plan. No quantitative assessment has been made by GBC of the effect of the proposals on car use in the Borough in the future.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1083   Respondent: 8687265 / Dagero Ltd (David Roberts)   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY D1 - Making better places

I OBJECT to the absence of any reference to vernacular or historic design guidelines, even in Conservation Areas. Most of the borough, especially the rural areas, has vernacular design guidelines that are available to give suggestions as to appropriate design. These should have mandatory planning force.

The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design? Should it not result in better-designed buildings?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2635   Respondent: 8693153 / Vicki Willetts   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY D1 (BETTER PLACES): • Poor monitoring. • No force given to vernacular or historic design guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4734   Respondent: 8711841 / Rosmarie Roberts-Kunz   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY D1 (BETTER PLACES):

• Poor monitoring.
• No force given to vernacular or historic design guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/11640  Respondent: 8721857 / Andrea Lightfoot  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

No reference to vernacular or historic design guidelines, even in Conservation Areas. Most of the borough, especially the rural areas, has vernacular design guidelines that are available to give suggestions as to appropriate design. These should have strong planning force.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9068  Respondent: 8723809 / Sally Blake  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to POLICY D1 - Making better places

• There is no reference to vernacular or historic design guidelines, even in Conservation Areas. Most of the borough, especially the rural areas, has vernacular design guidelines that are available to give suggestions as to appropriate design. These should have mandatory planning force.
• The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16889  Respondent: 8728865 / Neville Bryan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Object

While we support the emphasis on views, natural features, local distinctiveness, and layout of surrounding buildings, there need to be some good design criteria for Guildford and its setting, which should have mandatory planning enforcement.

The monitoring of this policy is inadequate, and should result in more sympathetic and better designed buildings.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2066  Respondent: 8729217 / Karen Stevens  Agent:
I object to the deletion in Policy D1 of the following wording:

“All developments will:
• respond meaningfully and sensitively to the site, its characteristics and constraints, and the layout, grain, massing and height of surrounding buildings
• be laid out to make the best use of the natural features such as trees and hedges and levels, and enhance views into and out of the site
• promote and reinforce local distinctiveness to create a sense of place, with innovative architecture encouraged and supported in the appropriate context
• be expected to have regard to and perform positively against Building for Life 12 criteria, and be expected to use art and materials of a nature appropriate to their setting.”

The requirements listed above would have improved the design of developments and reduced their adverse impact on the environment. There is no justification for their deletion.

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)
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16293</th>
<th>Respondent: 8768609 / Sue Brown</th>
<th>Agent:</th>
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<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy D1</td>
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<tr>
<td>The huge number (nearly half) envisaged as being necessary, to be built in one area of the Borough is going to turn pleasant villages into urban sprawl and lovely Guildford town into a conurbation. Lord Onlsow's plans for building a huge number of houses in Merrow on green belt land are not included yet.</td>
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<tr>
<th>Comment ID: PSLPP16/525</th>
<th>Respondent: 8775137 / Annette Clark</th>
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<tr>
<td>6) I object to the overall look of the plans and the building projects. It appears that there will be almost no countryside left for my family and friends. this will change the county of Surrey forever and I do not want to live and support a counsel that sees money as more important that people.</td>
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<tr>
<th>Comment ID: PSLPP16/761</th>
<th>Respondent: 8790529 / Nigel Carter</th>
<th>Agent:</th>
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<tr>
<td>1. The proposed density of housing proposed is also out of step with the existing density within East and East Horsley – it being considerably higher - and will put untold strain on the existing residents and the environment and infrastructure. There is no proven justification for this.</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: PSLPP16/1354</th>
<th>Respondent: 8795649 / G Pask</th>
<th>Agent:</th>
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**Comment ID:** PSLPP16/1511  **Respondent:** 8795649 / G Pask  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

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<tbody>
<tr>
<td>I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a development of more than 2,000 dwellings, with five storey high urban-style buildings and a population density higher than most London boroughs.</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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**Comment ID:** PSLPP16/8553  **Respondent:** 8799521 / David Donaldson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

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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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<tbody>
<tr>
<td>5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.</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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**Comment ID:** PSLPP16/126  **Respondent:** 8804929 / Helen Beckett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

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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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<tbody>
<tr>
<td>A further cause for concern is the level of street lighting. A rural area like this doesn’t need much street lighting at all.</td>
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</tbody>
</table>

We all accept the inevitability of change, however, the rate of change is a critical element. Changes must be assimilated whilst retaining the essential character of the area. We contend that the rate of change during the last twenty years has been too fast and we are now confronted with a step change. If the plan proceeds in its current form the essential character of the area will be lost for ever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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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.

**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: PSLPP16/12133</th>
<th>Respondent: 8812833 / Simon P Hill</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><em>Document:</em> Proposed Submission Local Plan: strategy and sites 2016 / Policy D1</td>
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<tr>
<td>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.</td>
<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: PSLPP16/3814</th>
<th>Respondent: 8817601 / A. L Thain</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><em>Document:</em> Proposed Submission Local Plan: strategy and sites 2016 / Policy D1</td>
<td><em>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</em></td>
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<tr>
<td>The entire character of the village will be changed forever due to the vast and rapid increase in housing and density which is against the wishes of most of the residences.</td>
<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: PSLPP16/876</th>
<th>Respondent: 8818753 / Chris Bussicott</th>
<th>Agent:</th>
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<td><em>Document:</em> Proposed Submission Local Plan: strategy and sites 2016 / Policy D1</td>
<td><em>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</em></td>
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<tr>
<td>I am writing to object in the strongest possible terms to the details contained in the latest draft local plan pertaining to the villages of East and West Horsley. I am deeply concerned that Guildford Borough Council Members and Officers seem to have more or less completely ignored the many well-argued objections raised to the last version of the plan for this area and created another proposal that seems hell-bent on destroying these beautiful villages. Of course I understand that the Horsleys are not part of the local ANOB, but they are directly adjacent to some of the finest landscape in the South East - rightly protected (I hope!) as ANOB - and the magnificent Lovelace architecture of East Horsley and the remarkable number of Tudor...</td>
<td><strong>Document page number</strong> 1521</td>
<td></td>
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</tbody>
</table>
and other ancient houses in West Horsley are without doubt significant contributors to the amenity value of the entire area. The fact that the plan proposes more than 500 houses actually within the villages will significantly damage this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18500  Respondent: 8826529 / Martin Barker  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

When I look at the map identifying the proposed developments in the North-West periphery of Guildford ie sites 60, 61, 62, 63, 64 and 65 it is clear that you are allowing Guildford to sprawl outwards thereby substantially diminishing the green space separating Guildford from the outlying villages. This is precisely what the Green Belt was designed to prevent. With the exception of site 63 (Slyfield) I therefore object to all these developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8560  Respondent: 8828353 / Claire Richards  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the density of the proposed housing as this is not in line with the current village design and character that is one of low density and a varied housing stock which has evolved over the years. The village also contains a considerable number of historic buildings. I believe it is possible to reduce the planned density within the rural areas of the borough by providing higher density homes and student accommodation within Guildford town. Students are less likely to want gardens and parking compared to those in rural communities. This would free up housing stock without having such an impact on the rural communities. New well-designed low-rise developments within the urban setting with good landscaping would be ideal and desirable for students and first time buyers/renters.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8289  Respondent: 8835425 / Martin O'Hara  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

LOCAL CHARACTER & DISTINCTIVENESS
I consider it essential that West Horsley’s local character, context and distinctiveness is clearly defined and then protected, or indeed enhanced, and reinforced within the Proposed Local Plan. Mediocrity in design or execution of any new housing should, and will, not be accepted.

I therefore SUPPORT Policy D1: Making better places; where these sentiments are reinforced by stating that “All developments will: …be laid out to make the best use of the natural features such as trees and hedges and levels, and enhance views into and out of the site…promote and reinforce local distinctiveness to create a sense of place….be expected to use art and materials of a nature appropriate to their setting”

Any new development should work to retain existing natural features and trees, rather than being allowed to clear all existing features, such as mature trees or hedgerows, to facilitate the standardised approach of volume house builders.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/8306  Respondent: 8835425 / Martin O'Hara  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

High density homes per hectare may be considered appropriate for an urban setting in central Guildford, but is generally inappropriate, and certainly not on this scale, for a village setting. A more appropriate level should be determined for semi-rural villages, in keeping with their existing characteristics, with some limited higher density housing perhaps included for the first-time buyers, elderly or those choosing to downsize, but wishing to continue to live locally. Such properties could include terraced houses and apartments within units designed to look like existing detached properties i.e. with domestic appearance and scale.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15776  Respondent: 8836129 / Roger Shapley  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

There is no reference to vernacular or historic design guidelines, even in Conservation Areas and we object to the absence of this from this policy.

Most of the borough, especially the rural areas, has vernacular design guidelines which are available to give suggestions as to appropriate design. These should have mandatory planning force.

The monitoring of this policy is inappropriate. We do not believe this policy will result in a reduction of the number of appeals for poor design.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/16226  Respondent: 8839041 / Jon Maslin  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Policy D1 Making better places,

I object to the absence of any reference to vernacular or historic design guidelines, even in Conservation Areas. Most of the borough, especially the rural areas, has vernacular design guidelines that are available to give suggestions as to appropriate design. These should have mandatory planning force.

The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design? Should it not result in better-designed buildings?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5863  Respondent: 8844257 / Jennifer and Michael Dodd  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

5) In my view implemenation of theses proposals would ruin for ever the essential characteristics of the Horsleys by converting them into an urban dormitory for commuters to work elsewhere

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1290  Respondent: 8845825 / John Gould  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

My wife and I are most concerned about your willingness to do away with parts of the green belt in this latest version of your Local Plan. Destroy that, and this region will become just like Croydon, an extended urbanisation from London; you will have destroyed what are some of the most attractive aspects of living in this area, which are also much appreciated by Londoners when they have time off.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/917  Respondent: 8848033 / Paul Gerrard  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy D1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

I object. Is this whole section actually needed? Now that a large part of it has been moved to Policy D4, it makes it more apparent that the remainder should probably be there too, as it all seems to be about design. Unless this is also meant to include re-design of existing areas, but that isn’t clear. The title “Place Shaping” sounds a bit woolly new age anyway.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Remove and merge completely into Policy D4 (and other policies if relevant).

Attached documents:

Comment ID: PSLPP16/3203  Respondent: 8850433 / Ian Doherty  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1
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: PSLPP16/17787  Respondent: 8858113 / Ramsey Nagaty  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to Policy D1 Making better places
I object to the absence of any reference to vernacular or historic design guidelines, even in Conservation Areas. Most of the borough, especially the rural areas, has vernacular design guidelines that are available to give suggestions as to appropriate design. These should have mandatory planning force.

The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design? Should it not result in better-designed buildings?
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2656  Respondent: 8858113 / Ramsey Nagaty  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy D1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
17 POLICY D1 MAKING BETTER PLACES
17.1 I object to the change by way of deletion of paragraph 4.5.8: “We will expect development to respond to local character and history, reflecting the identity of its context whilst allowing for innovative and forward thinking design….

17.2 There is no reasoned justification for this deletion and its omission will not make places better.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2230  Respondent: 8860897 / Julia Shaw  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( )

I PART OBJECT, PART SUPPORT this policy

I support the emphasis on views, natural features, local distinctiveness, and layout of surrounding buildings but object to the lack of reference to vernacular or historic guidelines.

I support the emphasis on views, natural features, local distinctiveness, and layout of surrounding buildings.

There is no reference to vernacular or historic design guidelines, even in Conservation Areas and I object to the absence of this from this policy.

Most of the borough, especially the rural areas, have vernacular design guidelines which are available to give suggestions as to appropriate design. These should have mandatory planning force.

The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design – should it not result in better designed buildings?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1129  Respondent: 8860897 / Julia Shaw  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( No )

1. I object to the change by way of deletion of paragraph 4.5.8: “We will expect development to respond to local character and history, reflecting the identity of its context whilst allowing for innovative and forward thinking design….

2. There is no reasoned justification for this deletion and its omission will not make places better.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The proposed densities for all the site appear to be based on a ‘one size fits all’ which is recognised as a flawed policy. Indeed the government’s figures of 30 -50 dph have yet to be achieved (TPCA – policy statement). In fact densities below 20dph are stated to be more conducive to a rural setting, whereas above this figure an ‘urban context may be achieved.

I object to the proposed designated sites in East and West Horsley due to their incompatibility with the nature and character of the two villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Expansion should be constrained to protect the character of town and country in our congested gap town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17580  Respondent: 8889761 / A Dougherty  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

12. I OBJECT to the high residential developments proposed around Ripley, Send & Clandon as these will effect the local communities and the nature of the villages by creating towns.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16979  Respondent: 8893057 / Dianne Garnett  Agent:

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 D1 Making better places

1.2 We object to the absence of any reference to vernacular or historic design guidelines, even in Conservation Areas. Most of the borough, especially the rural areas, has vernacular design guidelines that are available to give suggestions as to appropriate design. These should have mandatory planning force.

1.3 The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design? Should it not result in better-designed buildings?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14758  Respondent: 8896161 / Carol Wilson  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY D1 TO D4: Design
I object to the fact that proposed new towns are not environmentally or socially sustainable. They would bring congestion and misery.

I object to the omission of protection of the Green Belt amongst all the ‘green’ pronouncements.

Our village has no lights and everyone feels safe. Plus we have little light pollution. This is good for the environment. I object to the fact that light pollution and waste of energy for lighting is not included.

Recycling is extremely important but I object to the fact that recycling of land ie Brown field is not mentioned here.

I object to the insetting of villages and removal of 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: PSLPP16/8162</th>
<th>Respondent: 8902465 / Linda Slater</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>I OBJECT TO POLICY D1 (BETTER PLACES):</td>
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<tr>
<td>• Poor monitoring.</td>
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<td>• No force given to vernacular or historic design guidelines.</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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<tr>
<th>Comment ID: PSLPP16/8025</th>
<th>Respondent: 8902593 / Edward Kurk</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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<td>The massive scale of development within the vicinity</td>
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<td>If adopted, the New Local Plan would result in over 5,000 new houses within a 5 mile radius of Horsley. Development on such a massive scale and within such a compact area would have a truly devastating impact on the whole character and nature of the area which would be forever blighted.</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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<th>Comment ID: PSLPP16/4636</th>
<th>Respondent: 8906113 / Sally Clarke</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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<tr>
<td>I understand that the National Planning Policy Framework requires that new residential development must respect the character and density of housing in the area and be limited in quantity by the availability of infrastructure and local</td>
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</table>
facilities. It seems to me that the proposals for additional housing in the Horsleys as set out in the Guildford Local Plan do not do this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8627  Respondent: 8907137 / Jennifer A. Milligan  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 does not protect our Borough for future generations and does not respect our historic villages and their individual characters. We are very fortunate to have such individual historic villages so near to London and the M.25. Why does GBC want to over develop them and lose their individuality?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13809  Respondent: 8907457 / Russell Hills  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Horsley is a quaint village community with its own unique character and filling it with so many houses will completely destroy the nature, ambience, and present dynamics of village life.

There are areas of natural beauty which are protected and I believe that West Horsley should be one of them so I object to the planned development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16118  Respondent: 8914177 / J.V. & H.P. Brown  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The scale of the proposed developments would, however, have a detrimental impact on the rural characteristics that define life in this Surrey village. Any development needs to be proportionate in scale and not be at the expense of the quality of life of those of us already resident here.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/12077  Respondent: 8914945 / Nichola Armstrong  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Policy D1 and D2. This is a weak Policy because no thought or vision has been attached to conservation areas or historic value which makes an area unique. By building outside the Town Centre and urban area, The Plan encourages congestion on our road network so I can't see how the reduction of the Borough's footprint is actually going to work. building outside the Town Centre and urban areas is not sustainable development and will not reduce the carbon footprint. The roads will just become more and more congested because all of the development is outside of the town and urban areas. Any changes to the way energy infrastructure is supplied should be made to the Town and urban areas first because high density building uses more energy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15153  Respondent: 8926529 / Annie Cross  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy D1 - Making Better Places

I object to GBC not listening to their residents, who know better than GBC, what is needed to make their areas better places.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/71  Respondent: 8929057 / East Horsley Parish Council (Nick Clemens)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. DESIGN POLICIES

This section sets out the basis for a number of design policies relating to proposed developments in the Borough.

POLICY D1: Making better places

We support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/8783  Respondent: 8933185 / Peter See  Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy D1</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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<tr>
<td><strong>4.5.1 Policy D1 : Making Better Places</strong> It is: Good design is</td>
</tr>
<tr>
<td><strong>Objection</strong> - Add to Policy D1: If appropriate, developers will be expected to contribute to the cost of removal of wooden electricity poles and overhead cables which are ugly and environmentally intrusive in many roads, eg in Ash. Many telephone cables should also be relocated underground .</td>
</tr>
</tbody>
</table>

| **What changes (2016)/further amendments (2017) do you suggest should be made to the document?** |
| **Attached documents:** |

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/2969  Respondent: 8933889 / Nicholas Travers  Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy D1</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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<tr>
<td>6) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.</td>
</tr>
</tbody>
</table>

| **What changes (2016)/further amendments (2017) do you suggest should be made to the document?** |
| **Attached documents:** |
For the Horsleys, this proposed scale of housebuilding would so enlarge the villages as to overwhelm and destroy their existing charm. Instead of living in a village, residents would end up living in an expanding, suburbanising conglomeration with entirely inadequate local infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to the large areas of land identified for possible development which, combined with the significantly increased housing density and extension of the village boundaries, will completely change the character of the individual villages concerned. These individual villages are a valued part of the Surrey environment and their destruction by accumulation into an amorphous sprawl cannot be undone once it has taken place - the atmosphere will charge irreversibly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

We generally support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
15. I object to policy D1. Firstly, the deletion of the word “must” in para 2. This means that the policy will be unenforceable (see earlier comments). The word “must” has to be retained.

16. I object to the deletion of the wording in para 2 of policy D1 which must remain in full and I also object to the deletion of para 4.5.8.

17. I agree with the insertion of para 4.5.8 regarding the need for an efficient broadband connection but would add that the needs of current residents should take precedence. The state of broadband provision in parts of the borough (e.g. Ockham) is frankly dire.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12630  Respondent: 8945441 / Hazel A. Jarvis  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We lived in Guildford Park Avenue when our children were small and I was able to manage family life easily with no car at my disposal. Almost all of those ideal family homes are now multi-occupied student lets. Meanwhile, you plan to solve the problem by allowing urban sprawl over our precious countryside and by destroying our grandchildren’s natural environment. Please do not try to solve our present problems by creating a grid-locked, soulless suburbia where no one will want to live anyway! I have taken the trouble to write . I hope you will take the trouble to listen. Wishing you vision and foresight in your difficult task and sending my best wishes to you in your endeavour.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9381  Respondent: 8948385 / Gillian Eve  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy D1: Making better places

I OBJECT to this policy in its current form. Whilst I welcome the sentiments expressed, the wording is so imprecise that it is unlikely to have any binding effect on developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16168  Respondent: 8948385 / Gillian Eve  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1
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<th>Comment ID: pslp171/2522</th>
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<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy D1</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 this policy in its current form. Whilst I welcome the sentiments expressed, the wording is so imprecise that it is unlikely to have any binding effect on developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<th>Comment ID: PSLPP16/8054</th>
<th>Respondent: 8954529 / Maggi Moss</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1</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 D1: Place Shaping

I OBJECT to the deletion of para 4.5.8.

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: PSLPP16/17308</th>
<th>Respondent: 8967233 / University of Surrey (University of Surrey)</th>
<th>Agent: Terence O'Rourke (Luke Vallins)</th>
</tr>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1</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? ( )

Any expansion should be constrained to protect the character of the town and surrounding country, our gap town is already severely congested and every effort should be made to preserve the status of the town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPP16/14024  **Respondent:** 8974177 / Nigel Mitchell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Support**

However the level at which play facilities should be provided needs to be reduced to 10.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/8680  **Respondent:** 9050337 / Nigel Geary  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

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:** PSLPP16/11467  **Respondent:** 9062913 / Susan Parker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**POLICY D1 Making better places**

PART SUPPORT, PART OBJECT I support the emphasis on views, natural features, local distinctiveness, and layout of surrounding buildings.

There is no reference to vernacular or historic design guidelines, even in Conservation Areas and we object to the absence of this from this policy. Most of the borough, especially the rural areas, have vernacular design guidelines which are available to give suggestions as to appropriate design. These should have mandatory planning force.

The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design – should it not result in better designed buildings?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp171/1869  **Respondent:** 9062913 / Susan Parker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy D1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the change by way of deletion of paragraph 4.5.8: "We will expect development to respond to local character and history, reflecting the identity of its context whilst allowing for innovative and forward thinking design."

There is no reasoned justification for this deletion and its omission will not make places better.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Policy D1: Making Better Places

Object (not effective in respect of NPPF paragraph 182)

WPI supports the majority of the meaning and intention of the design policy. The design principles outlined are sound and reflect better practice.

A technical objection is raised with respect to the bullet points on residential developments of 25 or more dwellings. This reflects comments made by WPI on draft policy H1 (Homes for All). It is typical for new residential developments to have regard to character and context considerations. However, the opportunity to embrace distinctive new character and density should be reflected in the policy. WPI has made a similar representation with respect to draft policy D1 (Making Better Places).

The same principle applies to the use of art and materials "of a nature, appropriate to their setting". Major new developments have the potential to create place and setting.

In order to be effective, amendments are required to this draft policy. This would best be achieved by simply recognising the potential design benefits offered by major strategic development.

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)

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Policy/ Original Changes requested (July 2016 Representation) Understanding of changes shown in the Focused Amendments (June 2017) WPI Comments

---

Comment ID: pslp171/2757  Respondent: 9079393 / Wisley Property Investments Ltd.  Agent: Savills (Jim Beavan)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
<table>
<thead>
<tr>
<th>Section / page / para</th>
<th>(Updated Representation)</th>
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</thead>
<tbody>
<tr>
<td>Policy D1: Making Better Places Page 94</td>
<td>Include an additional paragraph to the policy: &quot;Distinctive character and quality design opportunities should be taken into account at major strategic sites or new settlements such as Wisley Airfield&quot;.</td>
</tr>
<tr>
<td></td>
<td>(Page 106)</td>
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<tr>
<td></td>
<td>Policy is now called “Place Shaping”. The requested additional paragraph has not been included. However, the requirements for developments of 25 or more units are now more flexible as a result of the replacement of “must” with “should”.</td>
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<td>A new bullet point (e) has been added, stating that development should be “designed to facilitate the delivery of high quality communications infrastructure to support sustainable modern living”.</td>
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<td>Previously stated development criteria has been removed.</td>
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<td>The supporting paragraph 4.5.8 has been removed and replaced by a new paragraph 4.5.8a, relating to broadband.</td>
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<td></td>
<td>WPI welcome the clarification and additional flexibility provided which is more effective.</td>
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<td></td>
<td>Objection withdrawn, on the basis of the additional high quality design/architecture text added to policy A35.</td>
</tr>
<tr>
<td></td>
<td>Other changes relating to bullet point (e) and development criteria area noted.</td>
</tr>
</tbody>
</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3773  **Respondent:** 9097409 / Lindsey Fisher  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( )  is Sound? ( )  is Legally Compliant? ( )

**Housing**

The density of housing proposed is out of keeping for the East and West Horsley Village. This size of increase would dramatically change the character of where we live. New residential development needs to respect the Village character and be limited in size by the availability of local facilities and infrastructure. Not the other way round. West Horsley appears to have a huge 35% increase, compared to other areas – eg Ash/Tongham 16% ? Also the impact of the proposed 2000 houses in Ockham/Wisley will ricochet into the Horsley facilities dramatically!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12374  **Respondent:** 9237953 / Patricia Wood  **Agent:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the proposed density of houses, which is much too high and not in keeping with the areas for which they are proposed. You have no right to change the character of villages such as East and West Horsley, Ockham and Ripley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/14958  Respondent: 9327009 / sp2 Consulting Limited (Stephen Parker)  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I PART SUPPORT, BUT PART OBJECT. I support the emphasis on views, natural features, local distinctiveness, and layout of surrounding buildings. There is no reference to vernacular or historic design guidelines, even in Conservation Areas and we object to the absence of this from this policy. Most of the borough, especially the rural areas, have vernacular design guidelines which are available to give suggestions as to appropriate design. These should have mandatory planning force. The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design – should it not result in better designed buildings?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5875  Respondent: 9412065 / Stephen Bray  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

D1 - Making better places:

The development of sites within West Horsley containing 25+ new homes to be inclusive of a mix of uses, to promote a sense of community. and to provide facilities and services is a policy I will wholly support.

Similarly I will support the creation of meeting places, play and recreation areas, and public spaces, complimentary to acceptable housing developments in West Horsley.

I do not presently see that the objective of facilitating and promoting walking, with short walking distances to and from facilities, is sufficiently addressed in the plans for West Horsley. Again, the following sections in this consultation response attempt to potentially address these issues with some positive suggestions.

Ease of access, promotion of a healthy lifestyle, and safety for pedestrians and cyclists are laudable objectives. I do not, however, see them sufficiently addressed in the plans for West Horsley, and there follow some suggestions to potentially address these issues.
There is, in my view, a critical need for a study of West Horsley as a village to go hand in hand with individual site developments. The injection of investment into the village should enable positive improvements to be effected to the wider environment, to be achieved through Section 106 agreements. Such improvements are likely to make otherwise potentially controversial developments more acceptable to local people.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/7101  **Respondent:** 10615137 / Nav Nair  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Finally, I oppose the encroachment into the Green Belt, which is a green barrier to London, straddling the M25. If village change to town and significant chunks of green belt are built upon, these hamlets become an extension of suburbia.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/640  **Respondent:** 10616225 / Gloria Shoesmith  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The sad event of all these proposed dwellings will result in the villages merging to such an extent that they will lose their individuality as there will be no boundaries evident. Can I ask why all of these proposals have to be within this small area. Why not other surrounding villages like Worplesdon, Farnham, Godalming etc?

I do hope some of these fears, which I know are shared by many, get listened to.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/1582  **Respondent:** 10617441 / Graham Sykes  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1590  Respondent: 10617569 / Lydia Sykes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16095  Respondent: 10643073 / C Prowse  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

All these sites are extensions to existing village (a complete new village in the case of the wisely airfield). This will result in urban sprawl. Developments should be within existing village boundaries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8232  Respondent: 10662849 / Garry Walton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY D1 - Making better places

I OBJECT to the absence of any reference to vernacular or historic design guidelines, even in Conservation Areas. Most of the borough, especially the rural areas, has vernacular design guidelines that are available to give suggestions as to appropriate design. These should have mandatory planning force.

The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design? Should it not result in better-designed buildings?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/4360  Respondent: 10717985 / Alison Drennan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to this disproportionate and excessive development for Send as this will result in a loss of our village and community identity - this will be detrimental to local residents and our quality of life.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6973  Respondent: 10724769 / P. Broughton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

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:

Comment ID: PSLPP16/449  Respondent: 10729473 / P.T. Elms  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

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 Green Belt buffer that Send provides between Guildford and Woking. It will become one suburban sprawl.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/2117</th>
<th>Respondent: 10730721 / The Milestone Society (Colin Woodward)</th>
<th>Agent:</th>
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</table>

Policy D1 (Making Better Places) is also to be commend for safeguarding and protecting local distinctiveness, as is your support for the Surrey Hills A.O.N.B.

The Milestone Society is particularly interested in retaining historic street furniture. This importance is recognised in English Heritage's (now Historic England) publication "Designating Heritage Assets - Street Furniture" (2011).

The Society wishes to re-iterate its view that the Guildford Plan should include specific reference to the importance of retaining historic street furniture in road and development schemes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/247</th>
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</table>

I strongly object to many aspects of the local plan proposed for our village.

- Send should not be removed from the green belt. We are a village and have no wish to joined to other settlements by the large number of homes and industrial sites proposed.

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: PSLPP16/8630</th>
<th>Respondent: 10764385 / E.E Whearley</th>
<th>Agent:</th>
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I have tried to keep my objections short but I will make a further comment.

Village are a very important part of our community in this country and the views of the residents should be an important part of any development considered by an elected council.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/7239  Respondent: 10775169 / Caroline Grafton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Expansion should be constrained to protect the character of town and country in our already congested town.

It is unacceptable that, 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:

Comment ID: PSLPP16/1420  Respondent: 10782625 / Heather Alexander  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13706  Respondent: 10782625 / Heather Alexander  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY D1 (BETTER PLACES):

- Poor monitoring.
- No force given to vernacular or historic design guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/841  Respondent: 10798049 / Steve & Maureen Knight  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1
<table>
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There is no reference to vernacular or historic design guidelines, even in Conservation Areas and we object to the absence of this from this policy. Most of the borough, especially the rural areas, has vernacular design guidelines which are available to give suggestions as to appropriate design. These should have mandatory planning force. The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design – should it not result in better designed buildings?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17538  Respondent: 10799425 / Guildford Greenbelt Group (Susan Parker)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We object to Policy D1 Making better places  We object to the absence of any reference to vernacular or historic design guidelines, even in Conservation Areas. Most of the borough, especially the rural areas, has vernacular design guidelines that are available to give suggestions as to appropriate design. These should have mandatory planning force. The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design? Should it not result in better-designed buildings?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/830  Respondent: 10804961 / M. Basson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

PART SUPPORT, PART OBJECT We support the emphasis on views, natural features, local distinctiveness, and layout of surrounding buildings.

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The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design – should it not result in better designed buildings?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/942  Respondent: 10805089 / Michael Stuart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I have (believe it or not!) studied the Draft Local Plan which I fear has been designed to be totally inaccessible and incomprehensible on purpose for many local people to even wish to read. It is incredibly lengthy and overlooks the fundamental principle that there exist many brown field sites within the borough which are not being developed upon.

The insetting of local villages such as East and West Horsley, Ripley, Send, Clandon, to name but a few is just, it seems to me, a tactic to their removal from the Green Belt allowing increased and inappropriate development thereon.

Green Belt by its very name is defined as "an area of open land around a city" - there will be no open land around Guildford if the local plan is ratified.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6867  Respondent: 10816673 / G Hall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

These proposed developments each change the local area where they are planned. They are over-bearing, out-of-scale or out of character in terms of its appearance compared with existing development in the vicinity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/224  Respondent: 10819297 / Phil Haymes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

As an East Horsley resident I am writing to formerly object to the proposed new Local Plan which seems to have ignored my previous submission, specifically:

• The loss of the Green Belt in the East Horsley area due to propose new housing developments for >500 new houses (noted below) would significantly change the character of the village and further shrink the Green Belt, will radically change what is supposed to be a 'conservation area' and it will inevitably lead to further urbanisation in years to come and a have serious impact on life in our villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16780  Respondent: 10828897 / Christopher Merrick  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Ruin the character of the Borough, resulting in urban sprawl merging villages

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to POLICY D1 - Making better places

• There is no reference to vernacular or historic design guidelines, even in Conservation Areas. Most of the borough, especially the rural areas, has vernacular design guidelines that are available to give suggestions as to appropriate design. These should have mandatory planning force.
• The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

2) I object to villages being removed from the green belt. This will in effect lead to mass development and a string of villages all merging with each other under a tidal wave of concrete.

3) I object to the 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:
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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/1053</th>
<th>Respondent: 10837217 / Gillian Dobb-Ponds</th>
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</table>

I am strongly object to the change in the Green Belt the villages will end up joining up to each other. We will end up [text unreadable] Ewell, Epsom.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/3482</th>
<th>Respondent: 10843361 / Natalie Brown</th>
<th>Agent:</th>
</tr>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1</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 object to POLICY D1 - Making better places

- There is no reference to vernacular or historic design guidelines, even in Conservation Areas. Most of the borough, especially the rural areas, has vernacular design guidelines that are available to give suggestions as to appropriate design. These should have mandatory planning force.
- The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/198</th>
<th>Respondent: 10843489 / Philip Fleming</th>
<th>Agent:</th>
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</tbody>
</table>

1. The number of houses proposed for the main sites in East/West Horsley is far too many and will change the distinct nature of the villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
D1 – Making Better Places

Culturally we rely on our cars and suggesting that people are going to walk or cycle would mean a cultural shift. How is this going to be encouraged, monitored and enforced? The roads around the Horsleys are narrow and pot-holed, with poor street lighting.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Overall the proposed developments are wholly out of proportion with the existing villages and infrastructure and will destroy local communities, change irreversibly the character of the villages for which generations of local residents have chosen to settle here.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

1.1 I object to Policy D1 “Making better places” on the grounds that;

1.2 The absence of any reference to vernacular or historic design guidelines, even in Conservation Areas. Most of the borough, especially the rural areas, has vernacular design guidelines that are available to give suggestions as to appropriate design. These should have mandatory planning force.

1.3 The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design? Should it not result in better-designed buildings?
<table>
<thead>
<tr>
<th>Comment ID: pslp171/1113</th>
<th>Respondent: 10846625 / Frank Drennan</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy D1</td>
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<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )</strong></td>
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<tr>
<td>I object to the change by way of deletion of paragraph 4.5.8: “We will expect development to respond to local character and history, reflecting the identity of its context whilst allowing for innovative and forward thinking design” as this deletion weakens the policy and will not contribute to making places better.</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>
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<tr>
<th>Comment ID: pslp171/2142</th>
<th>Respondent: 10847521 / Andrew Procter</th>
<th>Agent:</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy D1</td>
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</table>
| 1.1 **I object** to the change by way of deletion of paragraph 4.5.8: “We will expect development to respond to local character and history, reflecting the identity of its context whilst allowing for innovative and forward thinking design….
| 1.2 There is no reasoned justification for this deletion and its omission will not make places better. |
| **What changes (2016)/further amendments (2017) do you suggest should be made to the document?** |
| **Attached documents:** |

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/9805</th>
<th>Respondent: 10853249 / Evan Parry-Morris</th>
<th>Agent:</th>
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<tr>
<td>Disproportionate size of sites in relation to rural locations</td>
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<tr>
<td>I object to the allocation of land to the sites of Wisley Airfield, Garlick’s Arch on the Ripley/Send border, and Gosden Hill at Clandon as the proposed development will have an adverse and permanent impact on local villages and their communities.</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>
<th>Comment ID: PSLPP16/621</th>
<th>Respondent: 10855777 / Ian Gray</th>
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</table>
• I object to the idea of linking villages together and killing the heart of surrey as it stands – this is not progress and against government statements on green belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8853  Respondent: 10857889 / William Kyte OBE  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I PART OBJECT, PART SUPPORT this policy

I support the emphasis on views, natural features, local distinctiveness, and layout of surrounding buildings but object to the lack of reference to design criteria, vernacular or historic guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1726  Respondent: 10857889 / William Kyte OBE  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

There is no justification for deletion of paragraph 4.5.8 : “We will expect development to respond to local character and history, reflecting the identity of its context whilst allowing for innovative and forward thinking design….

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/661  Respondent: 10858657 / Fiona Gray  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

• I object to the idea of linking villages together and killing the heart of surrey as it stands – this is not progress and against government statements on green belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18605  Respondent: 10858977 / Angela Otterson  Agent:
I object to Policy D1 Making better places

I object to the absence of any reference to vernacular or historic design guidelines, even in Conservation Areas. Most of the borough, especially the rural areas, has vernacular design guidelines that are available to give suggestions as to appropriate design. These should have mandatory planning force.

The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design? Should it not result in better-designed buildings?

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>PSLPP16/3580</th>
<th>Respondent: 10859585 / Irene Grainger</th>
<th>Agent:</th>
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<tr>
<td>Legally Compliant?</td>
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</table>

I object to the proposal in the local plan on the grounds that this would cause loss of village identity, be detrimental to the community and increase flood risk.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

<table>
<thead>
<tr>
<th>Comment ID</th>
<th>PSLPP16/10915</th>
<th>Respondent: 10866721 / Andy Court</th>
<th>Agent:</th>
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<tr>
<td>Legally Compliant?</td>
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</tbody>
</table>

Not meeting the needs of local communities

Poor quality of layout and housing design

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

<table>
<thead>
<tr>
<th>Comment ID</th>
<th>PSLPP16/9783</th>
<th>Respondent: 10871329 / Lyn Gargan</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy D1</td>
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<td>Legally Compliant?</td>
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</tbody>
</table>

This local plan is in danger of joining all the villages in to and extension of London suburbs, creating a huge urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

<table>
<thead>
<tr>
<th>Comment ID</th>
<th>PSLPP16/6547</th>
<th>Respondent: 10872577 / Carol Finlayson</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy D1</td>
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<tr>
<td>Legally Compliant?</td>
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</tbody>
</table>
• The building of such high density houses in the village in quite a concentrated area will destroy what is a quiet and rural village, which has been in existence for hundreds of years. These developments clash in style and density to the existing character of the village and will change the village forever. The increase in housing equates to an increase of approx. 35% in existing West Horsley households, an increase larger than any other in the Guildford Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16708  Respondent: 10877057 / Jennifer Dodd  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

5) In my view implementation of theses proposals would ruin for ever the essential characteristics of the Horsleys by converting them into an urban dormitory for commuters to work elsewhere.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17080  Respondent: 10877665 / Audrey Ivatts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the large amount of proposed development which will permanently alter the semi rural nature of the Send and Ripley area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4329  Respondent: 10877697 / Derek Howorth  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the number of The Horsleys Development sites. This would result in additional 593 homes which is, in my view, far to many and would totally change the village character.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/13270  Respondent: 10881217 / Ben Stevens  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I believe that your decision to destroy our precious Green Belt with these housing developments, the industrial site and the other proposed changes would change the nature of this beautiful area for ever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4260  Respondent: 10883905 / Anita Marshall  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The threat to Ockham, in particular, where I have lived for several decades is horrific. You propose to turn this “Rural Oasis” ( as one of your former Chief Executives called it), into a high density housing settlement, more in keeping with a new town than a Domesday village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4282  Respondent: 10884929 / Kim Mackenzie  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

PLEASE LOOK AGAIN AT THE NEEDS OF THE RESIDENTS, PAST AND FUTURE.

They are the lifeblood of any community. Ignore them, as appears to be your intent now, and you will rapidly destroy what has taken centuries to create for the benefit of all.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18142  Respondent: 10910273 / Lynda M Williams  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We support this policy.
### Comment ID: PSLPP16/7490  **Respondent:** 10910433 / Linda Willis  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to all the pockets of green breathing space being infilled in East and West Horsley, and surrounding villages. This would completely spoil the feel and look of the village. There must be some brownfield sites in larger towns like Guildford and Woking? Why does everybody have to be accommodated in the South East. Are Sheerness and the Isle of Sheppey and the Isle of Grain overloaded like we are in danger of being? Maybe some new towns with agriculture and light industry could be encouraged there. Or further north using up some of their green spaces.

### Comment ID: PSLPP16/17176  **Respondent:** 10910753 / Heather Thompson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

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 because, in effect, it merges the villages along the A3 in to a new urban sprawl. In the process, the individual villages, along with their very individual identities, will be lost for ever.

### Comment ID: PSLPP16/16136  **Respondent:** 10912513 / Sarah Green  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Following the approval of the revised Local Plan by the full council of Guildford Borough Council on 24th May, I object to the provisions set out in the Local Plan as they threaten to destroy the established nature and identity of our villages by building on Green Belt land and will add considerably to the already unacceptable levels of traffic on the A3, A247 and M25 and many other roads in the borough.

### Comment ID: PSLPP16/11331  **Respondent:** 10923297 / Matthew Burnham  **Agent:**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
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<th>Comment ID: PSLPP16/13131</th>
<th>Respondent: 10924609 / H Perryman</th>
<th>Agent:</th>
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<tr>
<td>I OBJECT TO POLICY D1 (BETTER PLACES):</td>
<td></td>
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<tr>
<td>• Poor monitoring.</td>
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<td>• No force given to vernacular or historic design guidelines.</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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<table>
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<tr>
<th>Comment ID: PSLPP16/1719</th>
<th>Respondent: 10933793 / Julia Tilbury</th>
<th>Agent:</th>
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<tr>
<td>I object to the fact that the proposed plan does not meet the requirements of local communities. Neighbourhood Plans have not been taken into account. The semi-rural aspect, clean air and country lanes are important to local residents and most want to retain them. Ripley has already accommodated more than a 10% increase in housing in the last few years and it will only take a little more to change its character dramatically. Thousands of new houses are proposed in the immediate vicinity, plus more over the northern border of the borough in Woking. This will mean congested roads and the destruction of the rural aspect.</td>
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POLICY D1 - Making better places

I OBJECT to the absence of any reference to vernacular or historic design guidelines, even in Conservation Areas. Most of the borough, especially the rural areas, has vernacular design guidelines that are available to give suggestions as to appropriate design. These should have mandatory planning force.

The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design? Should it not result in better-designed buildings?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16455  Respondent: 10934689 / Adam Fox  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

As stated previously, this development is not warranted or welcomed to our rural village. We want an end to continually having to object to plans unfitting for this village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15376  Respondent: 10935201 / Cathryn Walton  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

I OBJECT to the absence of any reference to vernacular or historic design guidelines, even in Conservation Areas. Most of the borough, especially the rural areas, has vernacular design guidelines that are available to give suggestions as to appropriate design. These should have mandatory planning force.

The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design? Should it not result in better-designed buildings?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16127  Respondent: 10941057 / Tim Green  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

I OBJECT to the absence of any reference to vernacular or historic design guidelines, even in Conservation Areas. Most of the borough, especially the rural areas, has vernacular design guidelines that are available to give suggestions as to appropriate design. These should have mandatory planning force.

The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design? Should it not result in better-designed buildings?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Following the approval of the revised Local Plan by the full council of Guildford Borough Council on 24th May, I would like to make it clear that I object to the provisions set out in the Local Plan as they threaten to destroy the established nature and identity of our villages by building on Green Belt land and will add considerably to the already unacceptable levels of traffic on the A3, A247 and M25 and many other roads in the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16132  Respondent: 10941057 / Tim Green  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to all sites in West Horsley for over 5 homes. The proposed sites will merge the villages of Oakham, West and East Horsley creating urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/208  Respondent: 10949601 / Victoria Parker  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1
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 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?

Attached documents:

Comment ID: PSLPP16/17901  Respondent: 10952193 / Chrissie Beard  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Large scale development would destroy the character of the villages of East and West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15174  Respondent: 10957281 / Linda Heffer  Agent:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17649</th>
<th>Respondent: 10958817 / Steve Wright</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy D1</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>

Policy D1. – needs strengthening
Tighten up this policy to make sure that high-quality development is enforced. As the policy stands it will be too easy for developers to ignore.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/259</th>
<th>Respondent: 10963137 / Gabrielle Erhardt</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy D1</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>

Guildford is a nice place to live - nice countryside (currently) and close to London. Therefore, Guildford council need to stop trying to meet all housing requirements and except that the town may not be able to meet these growth targets unless they ruin what is currently appreciated by residents – please stop trying to run the town as a business obsessed with growth, making money and purely business/commercial interests. Residents should have more of a voice.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/261</th>
<th>Respondent: 10963137 / Gabrielle Erhardt</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy D1</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>

I strongly object to the destruction of historical the villages that this development will encourage. This will destroy character and heritage of these villages through over development and overcrowding.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I strongly 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. This will negatively impact the enjoyment of this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6875  Respondent: 10970945 / Lee Snell  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I moved to Send 2 years ago with my wife for a couple of reasons.

I wanted to move near a village pub to appreciate a quiet village life with low congestion and enjoy long quiet walks in the country.

I foresee the plans as being a complete destruction to the community.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9213  Respondent: 10985057 / Anthony Parker  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY D1 Making better places – I PART SUPPORT, BUT PART OBJECT. I support the emphasis on views, natural features, local distinctiveness, and layout of surrounding buildings. There is no reference to vernacular or historic design guidelines, even in Conservation Areas and we object to the absence of this from this policy. Most of the borough, especially the rural areas, have vernacular design guidelines which are available to give suggestions as to appropriate design. These should have mandatory planning force.

The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design – should it not result in better designed buildings?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12488  Respondent: 10996737 / Sara Donnelly  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Expansion should be constrained to protect character of the town.
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/3214</th>
<th>Respondent: 11001505 / Greta Edwards</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy D1</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>
<td>9] I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.</td>
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<tr>
<td>10] I object to the continued inclusion of a site (the former Wisley Airfield - known as Three Farm Meadows - where the planning application has already been unanimously rejected by GBC’s Planning Committee.</td>
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<td>Continued……………………………</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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</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/3743</th>
<th>Respondent: 11012097 / John &amp; Jean Waters</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy D1</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>
<tr>
<td>Finally, if this Local Plan is adopted, this whole beautiful area will be completely desecrated and the character of our villages destroyed and lost to us and future generations for ever.</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>
<th>Comment ID: PSLPP16/16457</th>
<th>Respondent: 11015329 / Nick Riederer</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy D1</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>
<tr>
<td>I also object to the proposed changes to the village settlement boundaries in particular where there is no proposal to build new houses – what possible reason could there be? It is obviously a hidden agenda to permit further building in these areas at a later date without having to obtain separate approval in the future, if this plan is approved it won’t be long before the whole area will become in a London Suburb or ‘New Town’ by stealth.</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>
<td>Comment ID: PSLPP16/1851</td>
<td>Respondent: 11015489 / Lorraine Pipe</td>
<td>Agent:</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1</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>5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.</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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<table>
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<tr>
<th>Comment ID: PSLPP16/17819</th>
<th>Respondent: 11033921 / Tim Depledge</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1</td>
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<tr>
<td>I object - Again a wishy washy set of statements that any housing developer will say they comply with I pull our some statistics to prove compliance, but, will simply build a development designed to maximize returns. Furthermore, how will this be enforced??</td>
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<tr>
<td>I note that Policy D1 outlined in the Draft Local Plan states that new developments (in excess of 25 houses) must:</td>
<td></td>
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<tr>
<td>• provide a harmonious, integrated mix of uses, where appropriate, that fosters a sense of community and contributes to inclusive communities that provide the facilities and services needed by them</td>
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<tr>
<td>• provide places for communities to meet and interact, such as play and recreation and other public spaces</td>
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<tr>
<td>I cannot see how the proposed developments in West Horsley can meet these criteria. I also find it completely unacceptable that the Draft Local Plan lacks any reference to provision of additional services and addresses issues outlined above. How can we use this as a basis for future planning without considering these important issues, this therefore suggests the Draft Local Plan is not fit for purpose.</td>
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<tr>
<th>Comment ID: PSLPP16/17717</th>
<th>Respondent: 11036129 / George Dokimakis</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1</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>We are calling on the Council to respect the nature and character of our villages and impose a maximum development target of 20% housing every four years (of the total number of houses envisioned in the Local Plan).</td>
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</tbody>
</table>
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2173  Respondent: 11036129 / George Dokimakis  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- In terms of policy D1 The monitoring indicators of the same policy do not state what level success looks like. Very vague. 100% should be built for the quality mark.
- Policy D1 Design places, point 2 “should” go back to “must”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14145  Respondent: 11036289 / Osman Abdullah  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Policy D1 Making better places  I object to the absence of any reference to vernacular or historic design guidelines, even in Conservation Areas. Most of the borough, especially the rural areas, has vernacular design guidelines that are available to give suggestions as to appropriate design. These should have mandatory planning force. The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design? Should it not result in better-designed buildings?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/257  Respondent: 11051521 / J and M Baylis  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Strengthening of D1 (1) welcomed

I accept the deletion of the list in the Policy box and 4.5.8, and their replacement by the new Policy D4

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16317  Respondent: 11058817 / Janet E Sims  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- Removal of attractive, thriving villages from the green belt including Ripley, Send, West Clandon creating the prospect of an urban sprawl merging with Woking particularly when developments in that Borough are taken into consideration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8839  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 D1 (BETTER PLACES) – I object. This policy lacks measures to make sure historic and vernacular design guidelines are implemented.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14334  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 D1 Making better places I object to the absence of any reference to vernacular or historic design guidelines, even in Conservation Areas. Most of the borough, especially the rural areas, has vernacular design guidelines that are available to give suggestions as to appropriate design. These should have mandatory planning force. The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design? Should it not result in better-designed buildings?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16123  Respondent: 11100193 / Michael Turner  Agent: 
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Policy D1 Making better places I object to the absence of any reference to vernacular or historic design guidelines, even in Conservation Areas where Government policy requires development to preserve or enhance their
character. The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design rather than result in better-designed buildings?

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>PSLPP16/16313</th>
<th>Respondent:</th>
<th>11182849 / Ian Featherstone</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
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- Removal of attractive, thriving villages from the green belt including Ripley, Send, West Clandon creating the prospect of an urban sprawl merging with Woking particularly when developments in that Borough are taken into consideration.

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:</th>
<th>PSLPP16/17287</th>
<th>Respondent:</th>
<th>11458241 / Bewley Homes</th>
<th>Agent: Bewley Homes Plc (David Neame)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy D1</td>
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</table>

Policy D1 – OBJECT: UNSOUND – Not Positively Prepared or Justified:

The Council has included this policy within the Plan, which is clearly worded as a Development Management policy. Bewley considers that the inclusion of such a policy is not warranted at this stage given the clear intention set out by the Council to deal with Development Management policies in a separate Development Plan Document.

In any event the wording of the policy is overly restrictive in that it states that developments of 25 dwellings or more ‘must’ comply with all of the bullet point criteria listed. This approach fails to recognise the individual merits of development proposals and the fact that not every scheme will be able to, or indeed should, comply with all of the criteria listed in their entirety.

It is therefore considered that the policy should be deleted from the Plan and included in the later Development Management document in due course. If however the policy is to remain the wording of the introductory sentence should be amended to read as follows:

Residential developments of 25 or more dwellings should’

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>PSLPP16/17216</th>
<th>Respondent:</th>
<th>11832961 / The National Trust - London and SE (Rachel Botcherby)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy D1</td>
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</tbody>
</table>
The National Trust fully supports this policy. However since this is the key policy dealing with design in the plan we suggest that the wording of the first and fifth bullet points in the last section is amended to:

All developments will

- respond meaningfully and sensitively to the site, its characteristics and constraints, and the layout, grain, massing and height of surrounding buildings taking into account the context in which they are sited.
- Be expected to use art, materials and landscaping of a nature appropriate to their setting.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
27 POLICY D1 MAKING BETTER PLACES

27.1 I object to Policy D1 Making better places

27.2 I object to the absence of any reference to vernacular or historic design guidelines, even in Conservation Areas. Most of the borough, especially the rural areas, has vernacular design guidelines that are available to give suggestions as to appropriate design. These should have mandatory planning force.

27.3 The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design? Should it not result in better-designed buildings?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/706  Respondent: 15084897 / Save Send Action Group (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 change by way of deletion of paragraph 4.5.8 : “We will expect development to respond to local character and history, reflecting the identity of its context whilst allowing for innovative and forward thinking design….”

1.2 There is no reasoned justification for this deletion and its omission will not make places better.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/124  Respondent: 15106785 / Giles Puckle  Agent:

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 land to the strategic sites of Wisley Airfield, Garlicks Arch (Ripley/ Send border) and Gosden Hill (Clandon). Our local villages are unable to cope with these proposed extra homes and the local communities will be negatively impacted as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8940  Respondent: 15107297 / Ian McQuattie  Agent:

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 land to the strategic sites of Wisley Airfield, Garlicks Arch (Ripley/ Send border) and Gosden Hill (Clandon). Our local villages are unable to cope with these proposed extra homes and the local communities will be negatively impacted as a result.

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 D1 (BETTER PLACES):

• Poor monitoring.
• No force given to vernacular or historic design guidelines.

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 permanent impact on the surrounding local villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/187  Respondent: 15111905 / Wendy Reed  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We purchased Bramble way in Send Marsh specifically because it was in a green belt environment. We do not want this green belt taking away and becoming a suburb of Guildford/Woking which it will become with no green space in between and a mass of housing and traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/196  Respondent: 15112257 / Richard Winzor  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

2) I object to the plan to remove green belt status to this largely rural area of Surrey, which will create ribbon development along the A3, and set a precedent for further such developments in the future.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/205  Respondent: 15112769 / Gordon Laidlaw  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The size of this development would particularly change the character of these villages to part of an urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/215  Respondent: 15112769 / Gordon Laidlaw  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

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 draft plan for the building of the thousands of houses in my area of Send, Ripley and Clandon. These proposals would completely destroy the character of these villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/252  Respondent: 15120129 / Anthony Merryweather  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

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 proposed development of six sites in East and West Horsley. The proposal to allow the building of an additional 533 properties is completely unsuitable for this area. The area lies in the green belt, and there are also a number of conservation areas with in this area, this is completely incompatible with the proposal. I appreciate the government is placing councils under pressure to build more homes, but the type of homes that will no doubt be built - if these developments are allowed to go ahead - will be identikit mini Surrey mansions, completely unsuitable for the sort of starter homes at are actually needed. This is because the developers will need to maximise their profits and starter homes don't do it for them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/269  Respondent: 15122049 / Rebekah Day  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1
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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4515  Respondent: 15127777 / Keith Hammond  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Density of housing
The density of housing proposed on all sites is completely out of character with the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9685  Respondent: 15140065 / Daron Jones  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I'm sure I do not need to say any more, we pay a premium to live in a village and what you are proposing to do is going to turn our lovely villages into a town, and myself like many others bought our houses away from the hustle and bustle of busy towns, I see this is not a government proposal and only a Guildford borough council one, I strongly disagree with what you are wanting to do, it would make many people viewing your plans very angry and see GBC as being greedy and just thinking of the profits many more houses would bring in. This is a protest from my household not only myself and that's 5 people.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9755  Respondent: 15140225 / Stephen Reed  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
We purchased Bramble way in Send Marsh specifically because it was in a green belt environment. We do not want this green belt taking away and becoming a suburb of Guildford/Woking which it will become with no green space in between and a mass of housing and traffic.

We do not wish to live in a large town hence we moved to a village in the green belt.

There are sufficient brown sites available and Woking and Guildford are already inundated with tower blocks of new flats.

We strongly object to the way Guildford B.Council is attempting to reduce green belt and built houses and incur congestion where it is not appropriate.

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 local plan proposal to remove Send village from the green belt as I believe Woking and Guildford will just merge in to one big suburb and Send will lose its identity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Policy D1: Making better places

5.10 We agree that high quality design should be sought in all new developments. We are supportive of the good design principles outlined in the policy outlining that all developments will:

- promote and reinforce local distinctiveness to create a sense of place. Innovative architecture will be encouraged and supported in the appropriate context;
- be expected to have regard to and perform well against Building for Life criteria;
- be expected to use art and materials of a nature appropriate to their setting;
- take account of the context in which they are sited.

5.11 We also agree that in schemes of 20 or more dwellings or 0.5 hectares or more developments should make provision for a mix of uses, and the facilities and services needed by the new community. We agree that this should include places for communities to meet and interact, such as play and recreation and other public spaces.

5.12 We agree that new development should be designed to facilitate and promote walking and cycling by providing a high quality environment for pedestrians, convenient and safe routes through the development and to nearby areas for cyclists and that where possible, residential development should allow short walking distances to amenities.

5.13 We are in agreement that priority to non-car based modes of transport should be given, and we wish to emphasise that park and ride facilities make an important contribution to non-car modes of transport into Guildford centre. This is the case for both neighbouring residents who can walk/cycle to the facilities, as well as those from further afield who drive and park, who would otherwise drive into the centre of Guildford. Park and Ride facilities provide an important and significant reduction in automobile traffic, congestion, fumes and pollution in Guildford and thus enhance the environmental quality of Guildford town centre.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I was horrified to read when I was in Ripley yesterday that there is a plan afoot to create a massive amount of new homes in the Guildford Borough. Although we do not live in the Borough, we frequently visit Ripley, Send and Clandon and so appreciate these lovely ancient villages. As a family we are all too aware that new homes have to be built to accommodate an ever increasing population BUT there must be other sites that would not ruin our beloved villages. Once they are gone, they will never return and it is villages like these that make our country special.

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: PSLPP16/1031  Respondent: 15192257 / Jennifer Cliff  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

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, which will destroy our environment, and shows no respect to those rate-players who live outside Guildford centre. There appears to be no recognition of the need for the conservation of these villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1115  Respondent: 15195969 / Carrie Wheeler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I know I am one of many residents who has raised concerns over what is proposed, I do hope that you will listen to our objections, and see that what you have put forward is totally impractical and threatens to change the whole local environment, if our Green Belt status is removed, thereby allowing unlimited developments, we will no longer be a village, but a suburban ghetto!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1296  Respondent: 15216321 / Douglas Ollington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. Disproportionate size of sits in relation to rural locations

I object to the allocation of land to the strategic sites of Garlicks Arch (Ripley/Send border), Gosden Hill (Clandon) and Wisley Airfield. The proposed development of these sites will have a disproportionate impact on the surrounding local villages. They will have a permanent and negative 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: PSLPP16/1337  Respondent: 15227329 / Sharon Pask  Agent:
I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a development of more than 2,000 dwellings, with five storey high urban-style buildings and a population density higher than most London boroughs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/1577</th>
<th>Respondent: 15239297 / T Fleming</th>
<th>Agent:</th>
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<tr>
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</table>

Objections to the 2016 local Plan

Following the approval of the revised Local Plan by the full council of Guildford Borough Council on 24th May, I would like to make it clear that I object to the provisions set out in the Local Plan as they threaten to destroy the established nature and identity of our villages by building on Green Belt land and will add considerably to the already unacceptable levels of traffic on the A3, A247 and M25 and many other roads in the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/1645</th>
<th>Respondent: 15240929 / P. A. Finch</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1</td>
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</tbody>
</table>

6 I object to the Borough wide strategy for over 13,000 new houses without any constraints. This differs to all the other borough councils in Surrey and is over twice the figures for previous years. There is already too much new development in Wisley, Ripley and Clandon. If the proposed development goes ahead then these villages would lose their individual identities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/1747</th>
<th>Respondent: 15244641 / Wesley Raynbird-Tilbury</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1</td>
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</table>

POLICY D1 -Making better places

I OBJECT to the absence of any reference to vernacular or historic design guidelines, even in Conservation Areas. Most of the borough, especially the rural areas, has vernacular design guidelines that are available to give suggestions as to appropriate design. These should have mandatory planning force.

The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design? Should it not result in better-designed buildings?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
### Comment ID: PSLPP16/1811  Respondent: 15247265 / Aileen Aitcheson  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

<table>
<thead>
<tr>
<th>1. DESIGN POLICIES</th>
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<tbody>
<tr>
<td>This section sets out the basis for a number of design policies relating to proposed developments in the Borough.</td>
</tr>
</tbody>
</table>

**POLICY D1: Making better places**

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: PSLPP16/1835  Respondent: 15247745 / Brian Aitcheson  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

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<tr>
<td>This section sets out the basis for a number of design policies relating to proposed developments in the Borough.</td>
</tr>
</tbody>
</table>

**POLICY D1: Making better places**

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: PSLPP16/1845  Respondent: 15248321 / Gordon Pipe  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

| 5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs. |

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/1856</th>
<th>Respondent: 15248449 / Peter Bessler</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1</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>

4) I most strongly object to the threat the Local Plan poses to the historic rural village of The Horsleys, and Ockham and the blight on properties there. The plan calls for these relatively small and old villages consisting primarily of residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/1919</th>
<th>Respondent: 15253889 / Carole Gale</th>
<th>Agent:</th>
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<tbody>
<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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</tbody>
</table>

7) I object to the impact these developments will have on neighbouring areas such as Pyrford, which has not been taken into account.

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: PSLPP16/5758</th>
<th>Respondent: 15254433 / Peter Gatford</th>
<th>Agent:</th>
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<tbody>
<tr>
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</table>

I am born and bred a Guildfordian, I suspect, unlike many of those proposing the acceptance of this housing explosion in our area. Many come here because it is a lovely town still surrounded by greenbelt countryside, yet having a diversity of employment suitable to most, this but still outside the sprawling London suburbs they have left. Surely to retain that attraction we have to maintain it, not destroy it! We are already seeing the awful effects around us of home extensions and the anything goes policy of planning applications. Destroying the character of many areas. Perhaps we are looking at this from the wrong end. Maybe we should be looking at Local Authority/Government built housing, to satisfy the huge demand by that end of the market! Be it shared housing or rented. Control and asset ownership then is in the hands of the people/ council. My experience is that housing markets are dictated by first time buyers. This is a way of controlling that process. Building thousands of houses at the £600,000 to £1 million pound end around Guildford is not the way forward. This just to satisfy the pockets of the developers, the ego of council development officers and the niche end of the market.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
11.16 Policy D1 of the Proposed Submission Local Plan requires “all new developments to achieve high quality design and enhance the environment in which they are set.”

11.17 Whilst the requirement for ‘high quality design’ by the Council is supported and is in accordance with Paragraph 56 of the NPPF which “attaches great importance to the design of the built environment” (Paragraph 56) it is noted that the NPPF states that “it is important to plan positively for the achievement of high quality inclusive design” (Paragraph 57).

11.18 The Council is therefore seeking to apply a much greater requirement on new development in respect of design than is set out in the NPPF by requiring proposals to not only “achieve high quality design” but also “enhance the environment in which they are set”. This requirement is more closely aligned to the protection given to historic environments which as set out in Policy D3 of the Proposed Submission Local Plan should be ‘conserved and enhanced’.

11.19 No suitable justification has been provided by the Council to support this approach and as such the wording of Policy D1 should be revised to align with the requirements of the NPPF and not afford all development sites the same level of status as heritage assets, which are dealt with in Policy D3.

11.20 As set out previously in these representations whilst the insertion of ‘Policy D4: Development in urban areas and inset villages’ is supported it is considered that the wording of the Policy should be revised to avoid unnecessary duplication with other policies in the Local Plan.

11.21 In particular Policy D4 requires new development to “conserve locally and nationally important heritage assets and conserve and enhance their settings” however this matter is addressed explicitly in ‘Policy D3: Historic environment’ which relates to all developments not just those in urban areas and inset villages.

11.22 Policy D4 also requires new development to have “no unacceptable effect on the amenities enjoyed by the occupants of buildings in terms of privacy, noise, vibration, pollution, dust, smell and access to sunlight and daylight.”

11.23 Whilst there is no objection raised to the requirements of this text from Policy D4 it is noted that Policy D4 is explicitly stated to relate to ‘urban areas and inset villages’. This amenity requirement should be applicable to all forms of development within the Borough and as such should be incorporated into a different policy such as Policy D1.

11.24 The additional repetition of matters addressed elsewhere in the policies of the Local Plan is unnecessary and unjustified. The policies in the Proposed Submission Local Plan should therefore be revised accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Strongly support the importance of good design, having regard to heritage and effects on views, natural features etc. As expressed in paragraph 4.5.8, especially as applied to Guildford urban area

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9908  Respondent: 15263937 / Jim Holloway  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

An expansion of this size would seriously damage the character of the town and spoil the surrounding countryside. Guildford Council should choose to constrain it's overall housing growth and it's unacceptable that this is not put in place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17054  Respondent: 15277185 / David Skinner  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

It is also extremely important that expansion is kept sufficiently low that it protects the overall character of the town - I don't accept that the proposed plan does this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10960  Respondent: 15282625 / Kelly Graves  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY D1 (BETTER PLACES):
• Poor monitoring.
• No force given to vernacular or historic design guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2601  Respondent: 15287489 / John Bound  Agent:
I am particularly concerned with the over development proposed for the Horsleys, Send, Ripley and the proposals for the Wisley Airfeld.

Such overdevelopment will change the character of the area beyond all recognition. The proposed removal of the Horsleys from the Green belt would leave the area to the mercy of developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I support the GRA response and Oppose Guildford expanding by a quarter.

Expansion should be constrained to protect the character of town and country in our very congested gap town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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:
I object to Policy D1 Making better places  I object to the absence of any reference to vernacular or historic design guidelines, even in Conservation Areas. Most of the borough, especially the rural areas, has vernacular design guidelines that are available to give suggestions as to appropriate design. These should have mandatory planning force. The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design? Should it not result in better-designed buildings?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3456  Respondent: 15320737 / Steven Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to POLICY D1 - Making better places

• There is no reference to vernacular or historic design guidelines, even in Conservation Areas. Most of the borough, especially the rural areas, has vernacular design guidelines that are available to give suggestions as to appropriate design. These should have mandatory planning force.
• The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3152  Respondent: 15323041 / Jane Doherty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

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: PSLPP16/3270  Respondent: 15326881 / J and E Font Freide  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I support Guildford Residence Association’s response to the Local Plan and the Project should be in-line with the character of Guildford town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/3587  Respondent: 15342113 / Jane Carwardine  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. Changes in the boundaries will make future building beyond this plan able to encroach on more green spaces.

I object to the proposed change to the Settlement area. Our village and locality will become just an extension of Greater London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3798  Respondent: 15348321 / Vivien Sale  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I wish to protest very strongly against the proposed level of new housing for Guildford.

In particular,

Town character: expansion should be constrained to protect the character of town and country in our already extremely congested historic market town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3831  Respondent: 15348641 / Clare Bennett  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am sure there will be accusations of Nimbyism but I entirely support new development and provision of homes for younger families to bring fresh blood to our community.

However, this should take into account the size and nature of the current villages......one would hope that the new local plan would seek to enhance, not ruin the local environment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/3874</th>
<th>Respondent: 15349217 / Philip Cole</th>
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<td>3. West Horsley, and indeed by its proximity East Horsley too, would be swamped with new housing, destroying the character of the villages. The National Planning Policy Framework requires that new residential development must respect the character and density of housing in the area and be limited in quantity by the availability of infrastructure and local facilities.</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: PSLPP16/3962</th>
<th>Respondent: 15350561 / Janet Riddiford</th>
<th>Agent:</th>
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<td>2. The character and beauty of Guildford will be destroyed and the pleasure of living here will be lost 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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<td>Too much development in one area of the borough but combined with the developments in other areas, will make Guildford one huge mass of villages which have joined together.</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>1. <strong>Changes in the boundaries will make future building beyond this plan able to encroach on more green spaces.</strong></td>
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</table>
I object to the proposed change to the Settlement area. Our village and locality will become just an extension of Greater London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4063  Respondent: 15353505 / Susan Mazalon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

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 inappropriate proposals to develop a large number of houses on Wisley Airfield and in the villages of East and West Horsley.

Collectively, you have failed to take into account the widespread resentment of your proposals in the local communities. In particular,

1) the residents within these communities have chosen to live in rural/semi rural surroundings. If they had wanted urbanisation then they would be living in better serviced and valued areas like Guildford or Surbiton. Our area is a magnet to visiting tourists from London and the surrounding areas to enjoy its beauty, unique wildlife and beautiful vistas in harmony with their surroundings. The amount of cyclists using our area is ever increasing and that is just one example of why it is important to protect our environment. This has a social and economic value.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4072  Respondent: 15353633 / Neal Stone  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

As any good citizen I understand the need to develop housing – especially that which is affordable for key workers. However, development must surely always be kept in check with the tone and style and density of the local spaces as well as the amenities that serve those communities. The suggested development areas earmarked in the Horsleys and the surrounding areas particularly Gosden Hill Farm and Wisley Airfield are completely out of proportion of the existing neighbourhoods and would change the feel of the local area irrevocably. And of course, other knock-on effects such as increased traffic and pollution are inevitable along with immense strain on services.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4085  Respondent: 15353633 / Neal Stone  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I suggest you really do listen to the voices of people from the communities that you serve and withdraw and then fundamentally rethink your proposed 2016 plan. Furthermore I would suggest that you truly engage with the communities that you serve and embrace their good ideas and criticism. The proposed submission is completely out of keeping with the local rural neighbourhoods and would be ruinous for generations to come, who will not get to enjoy the bucolic green spaces that their parents moved here for.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4267  Respondent: 15358497 / Liz Cooper-Mitchell  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The density of the development will totally change everything the existing area is known and loved for.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4698  Respondent: 15371809 / Susan Pengilly  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Once gone these areas cannot be reclaimed and this this area of small local village communities becoming Guildford 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: PSLPP16/4831  Respondent: 15377953 / cctvtraining.com ltd (Gordon Tyerman)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY D1 Making better places

GROUNDs FOR OBJECTION We support the emphasis on views, natural features, local distinctiveness, and layout of surrounding buildings.

There is no reference to vernacular or historic design guidelines, even in Conservation Areas and we object to the absence of this from this policy. Most of the borough, especially the rural areas, have vernacular design guidelines which are available to give suggestions as to appropriate design. These should have mandatory planning force.
The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design – should it not result in better designed buildings?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5106  Respondent: 15385601 / Richard Fletcher  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ) , is Sound? ( ) , is Legally Compliant? ( )

I also object to the proposed housing sites at A40, A41, A38, A39. These are all important open areas of land which contribute to the rural character of West Horsley. Two adjoin Ancient Woodland and are prone to flooding and are likely to create more surface water flooding along East Lane, Green Lane and Oakham Road.

This amount of development is not sustainable in this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5219  Respondent: 15389025 / Keith Cogan  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1
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?

Attached documents:

Comment ID: PSLPP16/5392  Respondent: 15391041 / Anne Lawrence  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ) , is Sound? ( ) , is Legally Compliant? ( )

I support the Guildford Residents Association (GRA) response and oppose Guildford expanding by a quarter
The evidence is flawed and is exaggerating the need for expansion as shown clearly by the GRA report on housing. Expansion should be constrained to protect the character of town and country in our congested gap town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5459  Respondent: 15398529 / Judith Linnegar  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The allocation of the land to the strategic sites of Wisley Airfield, Garlicks Arch (Ripley/Send border) and Gosden Hill (Clandon) is not sustainable. The proposed development of these sites will have a negative impact on the surrounding local villages and each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16721  Respondent: 15411457 / Emily Beynon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

All this to say nothing of the devastating impact it would have on a small rural village being transformed into something just short of urban! I will not here endeavour to point out the obvious impact on the beautiful countryside, lying as it does in an area of Outstanding Natural Beauty on the North Downs. I believe that any visitor to the village would agree it would be utterly abhorrent to encroach on the countryside around West Horsley! Surely Beatrix Potter, celebrated children’s author who used to stay at a cottage in the village with her uncle and aunt and did many of her paintings and wrote some of her books there, will be turning in her grave at the prospect of these plans for turning West Horsley 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: PSLPP16/6253  Respondent: 15427617 / Ken Scotland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

West Clandon and the villages and amenity areas around it constitute at present pleasant and peaceful semi-rural habitation. The proposed housing changes would evidently change all of that, resulting in a quasi-urban environment which is not what the local peoples wish for. I understand that there may be a need for increased housing, but would
question whether that should be done at the cost of destroying much of the quality of life of existing residents. There are other areas where such developments could be done without such consequences.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6371  Respondent: 15430241 / Tina Grace  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Most surveys conducted by parish council and local groups show a need and tolerance for no more than 50 - 100 new homes. Such a number could be slotted in around / within existing housing areas and if planned and executed sensitively, will have hopefully minimal impact on the character and practical functioning of the village

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6524  Respondent: 15433825 / Mary Howard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Expansion should be limited, to protect the character of our gap town and surrounding countryside

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6688  Respondent: 15436961 / Barbara Meredith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The proposed increase In the number of residences in the villages of Ockham, East and West Horsley is totally out of keeping with the local environment and I object very strongly to this local development plan

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6793  Respondent: 15438945 / Jacqueline Davies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to POLICY D1 - Making better places

- There is no reference to vernacular or historic design guidelines, even in Conservation Areas. Most of the borough, especially the rural areas, has vernacular design guidelines that are available to give suggestions as to appropriate design. These should have mandatory planning force.
- The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6903  Respondent: 15440513 / Alexandra Gordon  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I very 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.

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.

Please 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: PSLPP16/6911  Respondent: 15440609 / S Trower  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The proposed housing developments are at a much greater density than the existing housing. Current small scale developments have to be in keeping with the area & street scene, so why are new ones on such a higher density?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6917  Respondent: 15440705 / Jane Martin  Agent:
The proposed density of several hundred additional houses is not in keeping with the current semi-rural aspect of the village. It would be of interest to find out who will fill the additional homes proposed as there is no evidence within the Guildford plan to justify the need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT TO POLICY D1 (BETTER PLACES):
• Poor monitoring.
• No force given to vernacular or historic design guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Expansion should be limited to protect character of town

The evidence for expansion is exaggerated (GRA report on housing) and the consultation period has been limited.
We should value the unique beauty of our market town and its surrounding areas. It is these green spaces that allow us as a community to thrive. It is wrong to deny future generations the same advantages.

Both the physical and mental health of the community will be impaired by such an outlandish and disproportionate level of development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID: PSLPP16/7642   Respondent: 15450817 / Audrey Gachen   Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1**

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object to POLICY D1 - Making better places

- There is no reference to vernacular or historic design guidelines, even in Conservation Areas. Most of the borough, especially the rural areas, has vernacular design guidelines that are available to give suggestions as to appropriate design. These should have mandatory planning force.
- The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID: PSLPP16/7777   Respondent: 15452193 / Susan Hibbert   Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1**

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

It is essential to apply constraints in order to protect the unique character of Guildford, which unconstrained development will ruin.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID: PSLPP16/17358   Respondent: 15460737 / Donna Collinson   Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1**

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

There is much to be welcomed in this policy and text.
4.5.5 and 3.5.6 We need a Local Plan Development Management Policies Document urgently. We will be vulnerable without development control and design policies in place. Can relevant policies in the 2003 Plan be saved, at least to fill the gap?

The policy to “provide convenient and safe routes through the development and to nearby areas for pedestrians and cyclists” is particularly welcome given experience of developers failing to provide this.

We warmly welcome the addition of promoting green approaches to 4.5.8 which reads “The relationship of the built environment to the landscape must be taken into account and the transition from urban to rural character will need to be reflected in the design of new development with the green approaches to settlements respected.”

However, this approach should go beyond respecting to promoting. We propose that green approaches – both soft green edges to settlements and greenery along roads into settlements - are such a valued, distinctive feature of Guildford that this should be in the policy itself to guide developers. For example, “green approaches to settlements and” could be inserted after “with” in the following:

“All developments will:…promote and reinforce local distinctiveness to create a sense of place, with [green approaches to settlements and] innovative architecture encouraged and supported in the appropriate context.” We suggest “and supported” is superfluous.

Green approaches to settlements are just as important as innovative architecture in Guildford. Promoting green approaches is a dynamic concept not a brake on development. It affects how you do things and applies equally well to the design of settlement extensions and to managing change in established areas. We rely so heavily on green approaches to shape change for the better at inquiries and when responding to applications. It will become more important during a period of growth if we want to retain the qualities that distinguish Guildford and prevent it being a “could be anywhere” town.

Monitoring Indicators

Again we are concerned to avoid perverse consequences, with the possibility of reluctance to refuse due to poor design to avoid the risk of unsuccessful appeals.

Object: seeking improvements

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/8715  Respondent: 15475041 / Anne Geary  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

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: PSLPP16/8799  Respondent: 15476801 / Raymond and Monica Harmes  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

East Horsley with its characteristic mix of Lovelace buildings, thatched properties, woodland and farmland, together with West Horsley are two of Surrey's most desirable villages. Any major new housing development would be detrimental to our wonderful countryside and create an anonymous extension of Greater London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8941  Respondent: 15478017 / Kirstie Pankhurst  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY D1 (BETTER PLACES):
• Poor monitoring.
• No force given to vernacular or historic design guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9694  Respondent: 15485377 / Steve Andrews  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I have just read the Guildford Local Plan and feel I must register my objection on a number of important issues :-
The proposal to remove Ripley, Send and Clandon from the Greenbelt will completely change the character of the local environment. I do not believe there are any special circumstances to allow you to do this. Once these villages are removed from the green belt their unique identities will be lost forever as more properties will be built.

**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> 15485601 / Tim Jewers</th>
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<td>I object to the cramped over development of sites, which are out of keeping for the rural area.</td>
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<td>I would like to formally Lodge my objection to the proposed local plan, this is just another proposal of building schemes destroying our local community. Ripley village and surrounding areas have had considerable development recently, destroying our village Way of life.</td>
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<th><strong>Respondent:</strong> 15485985 / Jean Dunning</th>
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<td>I object to the allocation of land to the sites of Wlsley Airfield, Garlicks Arch and Gosden Hill. This will have an enormous and permanent impact on these village communities</td>
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<td>In fact I object to the destruction of village life which would occur when in reality the area would be turned into a town.</td>
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Comment ID: PSLPP16/9912  Respondent: 15487745 / Jon Korndorffer  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The expansion should be constrained to protect the character of the town and country in our congested gap town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10018  Respondent: 15495745 / David Williams  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

To build a large number of houses in the horsleys would completely change the character of the villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10046  Respondent: 15495873 / Gerard Duvé  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Making Better Places

I object to GBC not listening to their residents, who know better than GBC, what is needed to make their areas better places.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11808  Respondent: 15502465 / Mark Bourner  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Significant changes to the character of the village - The plan aims to build 593 new houses.  The national plan states that gaps in housing could be infilled but the proposed plan would irreversibly alter the character of the village, increasing the number of houses and population by 50%.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Once these areas are removed from the green belt there will be no distinction between them and eventually where does that end?! We lose our beloved countryside and eventually become a generic town like any other.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I OBJECT to the absence of any reference to vernacular or historic design guidelines, even in Conservation Areas. Most of the borough, especially the rural areas, has vernacular design guidelines that are available to give suggestions as to appropriate design. These should have mandatory planning force. So much new development is standards designs that are used national wide you could be anywhere in the country from Penzance to Edinburgh they certainly do not fit in to the local surroundings.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Policy D1 - Making Better Places

I object to GBC not listening to their residents, who know better than GBC, what is needed to make their areas better places.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Policy D1 - Making Better Places

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11458  Respondent: 15571425 / Monika Neczaj  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY D1 (BETTER PLACES):

• Poor monitoring.
• No force given to vernacular or historic design guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11629  Respondent: 15573793 / Alan Ridley  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I must object in the strongest terms to the proposed development in the Clandon, Ripley and Send areas. Whilst I do not live locally I have many friends who do and I was connected to the Ripley Cricket Club, one of the oldest in the world, for many years.

The English countryside is a resource that must be, for obvious reasons, preserved and cherished. Should you allow this project to happen then, in my opinion, you will alter forever the character of the above villages and you will be making a mistake that it will be impossible to rectify.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11920  Respondent: 15577377 / Rachael Hall  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
West Horsley village is a beautiful rural area, which I think is extremely important to maintain. To increase the number of houses by so much, will make it lose its status as a village and will become a densely populated small town.

This plan is reckless and I appeal to those who created it to think again

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/530   Respondent: 15584033 / Andrew Hutton   Agent:

Document:   Proposed Submission Local Plan: strategy and sites 2017 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy D1 Place Shaping

I object to 4.5.8 which formerly was a reference to development, responding to local character, history or vernacular architecture. This direction has been removed, indeed GBC appear to be encouraging unsuitable modern buildings in sensitive sites.

GBC have removed all reference to sensitive development, including being aware of and noting the characteristics of an area, constraints such as hedges and trees, and local distinctiveness.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12709   Respondent: 15585313 / Kim Styles   Agent:

Document:   Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

All this proposed development will not only ruin the essence of the villages but it will make one vast sprawling city out of Woking and Guildford which will be almost joined together. Perhaps GBC is thinking of re-naming the new city, Wokford or Guilding. Bus services are sparse. Ripley High street is very narrow as are a lot of Send roads, mornings and evenings its very congested. More traffic coming from Send Hill would only make things worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12820   Respondent: 15585889 / Tony Rodnight   Agent:

Document:   Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

proposed plan should protect (not erode) the character of Guildford town and the surrounding countryside
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12942  Respondent: 15586017 / C Maslin  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY D1 MAKING BETTER PLACES

I object to Policy D1 Making better places,

I object to the absence of any reference to vernacular or historic design guidelines, even in Conservation Areas. Most of the borough, especially the rural areas, has vernacular design guidelines that are available to give suggestions as to appropriate design. These should have mandatory planning force.

The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design? Should it not result in better-designed buildings?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12870  Respondent: 15587073 / Mark Sweeting  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. Wisley/Ripley/Send/Burnt Common/Send Marsh is a semi-rural area and development on this large scale will lead to urbanisation and permanently change the nature of the area. In particular this could provide the starting link in connecting Guildford to the M25.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13783  Respondent: 15595553 / Carol Davis  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1
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 high density housing in the Horsleys

The proposed increase of up to 35% of new homes compared to existing homes in West Horsley is greater than any other single area in the Borough. The proposals for West Horsley are unbalanced and unsustainable and would change the character of the village forever.
The NPFF requires that residential development must respect the character and density of the housing in the area and be limited in quantity 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:

|-----------------------------|---------------------------------------------|--------|--------------------------------------------------------------------------------|
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) | Design Policies: I am fully supportive of Design Policies D1 “Making better places”, D2 Sustainable design, construction and energy” and D3 “Historic 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? ( ) | - Poor monitoring.
- No force given to vernacular or historic design guidelines.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/16279  Respondent: 15603361 / Ann Watkins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? (), is Sound? (), is Legally Compliant? ()

I OBJECT TO POLICY D1 (BETTER PLACES):
• Poor monitoring.
• No force given to vernacular or historic design guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15418  Respondent: 15614497 / Hannah Yandle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? (), is Sound? (), is Legally Compliant? ()

I OBJECT TO POLICY D1 (BETTER PLACES):
• Poor monitoring.
• No force given to vernacular or historic design guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15676  Respondent: 15618881 / Jayne Barmby  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? (), is Sound? (), is Legally Compliant? ()

I OBJECT to the absence of any reference to vernacular or historic design guidelines, even in Conservation Areas. Most of the borough, especially the rural areas, has vernacular design guidelines that are available to give suggestions as to appropriate design. These should have mandatory planning force.
The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design? Should it not result in better-designed buildings?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15709  Respondent: 15619041 / Jack Cross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? (), is Sound? (), is Legally Compliant? ()
Policy D1 - Making Better Places

I object to GBC not listening to their residents saying what they need to make their areas better places.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15748  Respondent: 15623745 / Stella May  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Policy D1 Making better places I object to the absence of any reference to vernacular or historic design guidelines, even in Conservation Areas. Most of the borough, especially the rural areas, has vernacular design guidelines that are available to give suggestions as to appropriate design. These should have mandatory planning force. The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design? Should it not result in better-designed buildings?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17928  Respondent: 15627009 / Alison Morrison  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the immense damage it will do to amenity and the rural character of the area from Guildford to Effingham and south of Ripley I object to the tendency it will have to reduce the remaining rural area north of Ripley (which still retains for now a very special and distinct character) into little more than green patch surrounded by development

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16145  Respondent: 15633217 / Emma Cooper  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate amount of development in one area of the borough, our villages will lose their identities and blend into one.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to the disproportionate amount of development in one area of the borough, our villages will lose their identities and blend into one.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I OBJECT TO POLICY D1 (BETTER PLACES):
• Poor monitoring.
• No force given to vernacular or historic design guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

As a duty of care to existing residents what are you doing to support our quality of living? Is the borough strategy to compromise everything to 'below average'? The unbalanced nature of the plans can surely only have a negative result for a village of great character - on your watch will another location of great character turn into generic concrete sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
As a duty of care to existing residents what are you doing to support our quality of living? Is the borough strategy to compromise everything to ‘below average’! The unbalanced nature of the plans can surely only have a negative result for a village of great character - on your watch will another location of great character turn into generic concrete sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16714  Respondent: 15649825 / Chris Howes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

High density development would erode the character of Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16794  Respondent: 15652833 / Don Babington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Villages being absorbed by Guildford – not what the householders moved to the area for.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16881  Respondent: 15657057 / Frances Turner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY D1 MAKING BETTER PLACES

I object to Policy D1 Making better places.I object to the absence of any reference to vernacular or historic design guidelines, even in Conservation Areas where Government policy requires development to preserve or enhance their character. The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design rather than result in better-designed buildings?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Comment ID: PSLPP16/16887</th>
<th>Respondent: 15657121 / Robert Wheeler</th>
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<td>Where does this need come from to destroy a village's local identity? Because that's exactly what is going to happen [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]. Same as by allowing 'travellers' access to camp out on the fringes of the village. [Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature] Within walking distance of a school. Within touching distance of a field that is not only used by the school for Sports Days but is also used by the village for local events which create a positive buzz and an opportunity for the village to fund raise.</td>
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<th>Comment ID: PSLPP16/17269</th>
<th>Respondent: 15674689 / Chris Baker</th>
<th>Agent:</th>
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<td>I object to the proposed level of new house development within the villages of Ockham, Ripley, Send and the Horsley as it will not compliment the existing village and community way of life.</td>
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<th>Respondent: 15687329 / Kim Sweeting</th>
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I object to the absence of any reference to vernacular or historic design guidelines, even in Conservation Areas. Most of the borough, especially the rural areas, has vernacular design guidelines that are available to give suggestions as to appropriate design. These should have mandatory planning force.

The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design? Should it not result in better-designed buildings?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17762  Respondent: 15700353 / Edward Warren  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1
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 controls from the villages of Send and Ripley because there is no proper plan to deal with the increased headcount and they’ll no longer be villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18712  Respondent: 15733665 / Vortal Properties Ltd  Agent: Shrimplin Brown (James Brown)
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY D1: MAKING BETTER PLACES

The broad principles of this policy are supported, however, our Client has some concerns regarding the implications of practically applying some of the potentially ambiguous objectives and how the council may seek to apply these general principles in future detailed development control policies.

Our Client support the objective to deliver high quality design and the enhancement of the environment on all new developments. There are, however, a number of aspects of the more prescriptive policy text that should be clarified/adapted as follows:

The threshold of 25 dwellings or more is too low and does not reflect a scale of development which may in all instances:

- Deliver a mix of uses; and
- Provide play, recreation and other public spaces for the local

These objectives should be focused on larger scale residential development, particularly in the context of some of the significant sites proposed as part of the Council’s housing supply. A more realistic approach would be to set a threshold of 100 units where these objectives ‘must’ be provided and provide encouragement for these objectives on smaller sites.
With regard to the provision of play and recreation space and the tangible changes that can realistically be made in terms of prioritising non-car travel in new village sites of less than 100 units will be limited.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18713  Respondent: 15733665 / Vortal Properties Ltd  Agent: Shrimplin Brown (James Brown)
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY D1: MAKING BETTER PLACES

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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 D1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Our Client support the objective to deliver high quality design and enhancement of the environment on all new developments. There are, however, a number of aspects of the more prescriptive policy text that should be clarified/adapted as follows:

The threshold of 25 dwellings or more is too low and does not reflect a scale of development which may in all instances:

- Deliver a mix of uses; and
- Provide play, recreation and other public spaces for the local community.

These objectives should be focused on larger scale residential development, particularly in the context of some of the significant sites proposed as part of the Council’s housing supply. A more realistic approach would be to set a threshold of 100 units where these objectives ‘must’ be provided and provide encouragement for these objectives on smaller sites.

That aside the first objective for an “integrated mix of uses” and the provision of facilities and services is an objective which may be achievable on some medium scale sites 20-40 units within central town or village locations. In supporting housing schemes through infill development and the rounding off of village settlements there will be a clear role in ensuring the provision of new supporting services and facilities. Site A45 represents an opportunity to provide housing alongside new retail or commercial use.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td><strong>is Sound?</strong></td>
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**POLICY D1: PLACE SHAPING**

1.79 The broad principles of this policy are supported, however, our Client continues to have some concerns regarding the implications of practically applying some of the potentially ambiguous objectives and how the council may seek to apply these general principles in future detailed development control policies.

1.80 Our Client support the objective to deliver high quality design and enhancement of the environment on all new developments. There are, however, a number of aspects of the more prescriptive policy text that should be clarified/adapted as follows:

1.81 The Council have not addressed the previous concerns raised regarding the proposed threshold of 25 dwellings. The threshold is set too low and does not reflect a scale of development which may in all instances:

- Deliver a mix of uses; and
- Provide play, recreation and other public spaces for the local community.

1.82 These objectives should be focused on larger scale residential development, particularly in the context of some of the significant sites proposed as part of the Council’s housing supply. A more realistic approach would be to set a threshold of 100 units where these objectives ‘must’ be provided and provide encouragement for these objectives on smaller sites.

UNSOOUND: As currently drafted the policy could limit the deliverability and potential of smaller sites and as such would fail the test of being Positively Prepared or Effective.

Recommended Change: Increase the policy threshold to 100 units.
<table>
<thead>
<tr>
<th>Comment ID: pslp171/1253</th>
<th>Respondent: 15805601 / Guildford Greenbelt Group (Sir or madam)</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy D1</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>

We object to the change by way of deletion of paragraph 4.5.8: “We will expect development to respond to local character and history, reflecting the identity of its context whilst allowing for innovative and forward thinking design…. There is no reasoned justification for this deletion and its omission will not make places better.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/2128</th>
<th>Respondent: 17445345 / Albury Parish Council (Joanna Cadman)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy D1</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>

We request that the following bullet points that have been deleted are retained. These are important to Albury and its outer lying hamlets which have a well-defined character, with many buildings constructed of local stone. We believe the retention of these guidelines will better inform householders, developers, builders and architects to protect and preserve Albury Conservation area and environ, buildings of note and Conservation areas in the Borough. These are:

- Respond meaningfully and sensitively to the site, its characteristics and constraints and the layout, grain, massing and height of surrounding buildings.
- Be laid out to make the best use of the natural features such as trees and hedges and levels and enhance views into and out of the site
- Promote and reinforce distinctiveness
- Use material appropriate to setting

Page 106 4:5:8

Retain deleted wording for the same reason as stated under page 106 Policy D

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/1170</th>
<th>Respondent: 17979553 / Land to the East of White Lane, Ash (Sir or Madam)</th>
<th>Agent: Vortal Properties Ltd (Robert Symons)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy D1</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>
The changing of the wording of point (2) from ‘must’, to ‘should’ allows the required flexibility for each development to be considered on a case by case basis.

The inclusion of 4.5.8a should include wording to ensure the viability of a development is not hampered, or is considered within any viability argument over deliver of the site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Total records: 335.
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

Document part: Policy D2 - Sustainable design, construction and energy
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

Comment ID: PSLPP16/11419   Respondent: 8559297 / Holy Trinity Amenity Group (Robert Bromham)   Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

D2. Sustainable design, construction and energy. P97.

The designation of areas where new developments must make provision for connection to CHP networks needs clarification. Some of our established residential area, including Charlotteville, fall within the designated town centre “Heat priority Area”. Only isolated new developments, and extensions, are expected in these areas, and it does not make sense to impose connection requirements on these. No mention is made of provision of Solar PV Power; this needs to be included as an objective, particularly for large business buildings. Where good quality buildings are demolished to allow larger or more “contemporary” buildings to be built the loss of the embedded energy needs to be included in the energy assessment of proposals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1865   Respondent: 8561377 / The Guildford Society (Julian Lyon)   Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy D2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

In Policy D2 there are four instances where ‘must’ has been deleted and replaced with ‘are required to’. If this is a Statutory obligation, the legal instrument should be quoted. Otherwise, we would prefer the use of ‘must’.

The Guildford Society is very concerned about the availability of energy infrastructure in Guildford Borough and also the lack of provision for the generation of renewable energy and the shortage of facilities for charging electric vehicles.

Policy D2 (9) refers to a reduction in carbon emissions in new developments, but does not take account of existing building stock. There is a target of 20% for carbon reductions for new developments but no indication is given in the policy as to the baseline for this measure, albeit this is explained at 4.5.30. It would be helpful if the baseline were included in the policy itself.

We do not understand why there is a blanket exemption in Policy D2(10) for retail developments in the Town Centre, and although this is partly explained in paragraph 4.5.37a, there should be a recognition in these paragraphs rather than a specific policy exemption (after all, exactly the same argument could have been applied to Affordable Housing). We would recommend the removal of Policy D2(10).

At 4.5.30a there is reference to a financial viability test. There must be some form of hierarchy of viability tests to establish the sequence in which policy requirements (subject to viability) are withdrawn. For example, does the energy requirement come before or after Affordable Housing? It would be helpful to have a specific, clear policy on Viability as part of the Local Plan.

Otherwise we broadly agree with the amendments to Policy D2.

[Evidence Base – Viability Assessment]
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

We would recommend the removal of Policy D2(10).

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17434</th>
<th>Respondent: 8563201 / West Horsley Parish Council (Sam Pinder)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2</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>

**D2 – Sustainable design, construction and energy**

Report page: 15

WHPC view: Supports

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17479</th>
<th>Respondent: 8563201 / West Horsley Parish Council (Sam Pinder)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2</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 D2: Sustainable design, construction & energy**

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)

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/2196</th>
<th>Respondent: 8570273 / Fiona Curtis</th>
<th>Agent: Fiona Curtis</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2</td>
<td>Do you consider this section of the document: complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>

I object to Policy D2 Sustainable design, construction and energy Sustainability should be an overarching ambition, conditioning the whole local plan and running through it, as claimed in the NPPF, “like a golden thread”. It should be set out clearly in Policy S1, not buried away as a minor detail in Policy D2. This policy amounts to “greenwashing”, expounding aspirational environmental targets while ignoring the plan to build dormitory towns across the Green Belt that are environmentally and socially unsustainable. These settlements will bring vastly increased car use and will lead to unacceptable traffic congestion, overstretched social infrastructure, and more greenhouse gas emissions, noise and light
pollution. This policy should not be just about saving energy but about preserving the borough’s stock of natural capital, especially the countryside, from attempts to rig the housing market. This policy’s emphasis on Combined Cooling Heating and Power and communal heating networks is difficult to understand, since no such networks are available locally.

I am unsure of how 4.5.27 will apply to strategic sites with mixed development without a pool? Surely by their very nature ie 1000 houses plus, they will use a lot of energy and create a lot of waste?

Future proofing some houses for independent living for elderly should also be built into new builds at the planning stage. Given the ageing population, this would appear to be a serious omission. Elderly relatives can be looked after by relatives if a percentage of smaller bespoke homes are built for this purpose. This might also free up much needed family homes. The introduction of technology to new homes such as telecare / medicine would also help future proof homes and as Surrey is a leader in faster broadband applications this should be viable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/284  Respondent: 8571521 / Surrey Nature Partnership (Sarah Jane Chimbwandira)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy D2

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 the importance the Borough places on such matters through its inclusion and prominence in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13052  Respondent: 8573793 / Harry Eve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

80. This policy is another example of hypocrisy. While it says many fine things it ignores the fact that the Plan involves putting housing estates in the countryside generating a huge amount of additional traffic and greatly increasing carbon emissions. A major constraint on the housing number is needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1702  Respondent: 8573793 / Harry Eve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy D2

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 the importance the Borough places on such matters through its inclusion and prominence in the plan.
I object to retail developments being excluded from the carbon reduction requirement. The justification in 4.5.37a makes no sense and simply reflects GBCs attempt to increase town centre retail development, unnecessarily, and push housing into the countryside. This is the opposite of sustainable construction. It means that brownfield town centre sites will be wasted when they could be used to meet housing need in a much more sustainable way than the proposals in this draft local plan.

4.5.38 admits to the “particular issue of increasing pressure on water stocks in an area already classed as being under serious water stress” but seems to imply that improvements in standards of the way we use water will happen one day and that will be sufficient. Any improvement in standards is likely to be very small in comparison to the massive increase in domestic water consumption, locally, that will arise under this draft local plan. I object to the lack of a constraint based on water consumption and supply. This is an issue for planning in South-east England in general as well as for Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5959  Respondent: 8575585 / Ian Macpherson  Agent:  

Do you consider this section of the document: complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy D2: Sustainable design, construction and energy

" - reasonably achievable - ".Building regulations uses the term 'reasonable' against requirements, as otherwise trouble can be caused, and it should be used here.

It would really be much more sensible and in line with Governmental thinking to aim at compliance with national legislation, Building Regulations [ and national and NH BC technical requirements as developed], and leave it there. This can be done by way of referencing such sources.

There is a sort-of ‘arms race’ between Local Authorities [ the 'Merton effect ’ -though I understand that Merton has withdrawn from its extreme position] to demonstrate they are more 'sustainable' than their neighbours. The intention is wholly admirable. However a mass of experience is building up to show that premature or ill advised 'sustainable' works do not save the energy suggested in the original calculations and create expensive problems for the future. Solar electricity is now a well known example - the essential inverters tend to fail after about ten years [ eg through degradation of capacitors], 'spares' for that model of installation are then no longer available, and Fire Brigades are reportedly very cautious about entering to extinguish if such house do catchfire, due to the risk of roof collapse.

Another area fraught with disasters is dry lining of elderly houses.

GBC has insufficient expert scientific industry knowledge to evaluate highly technical schemes of this kind. Apart from disappointing performance , there is the side risk of GBC being sued over future failure if the works were installed as a result of formal requirement. Much better left to the Building Regulations Ad visory Committee and et al, as the Government then carries the risk.

It should be noted that the Government is becoming uneasy about the over-enthusiastic application of European legislation, and we may see changes following Brexit.

I have commented to this effect in the last 2014 round of consultation, and see that no notice has been taken. Would it be helpful if I gave references to technical articles?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/7021</th>
<th>Respondent: 8575617 / Effingham Parish Council (Ian Symes)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy D2</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>
<td>D2 Design - Sustainable design, construction and energy</td>
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<td>Support</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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<thead>
<tr>
<th>Comment ID: PSLPP16/17331</th>
<th>Respondent: 8579649 / Home Builders Federation (Mr James Stevens)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy D2</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>Parts of the policy conflict with national planning policy.</td>
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<tr>
<td><strong>Sustainability statements</strong></td>
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<tr>
<td>The first paragraph of the policy is contrary to national policy set out in the Written Ministerial Statement of 25 March 2015. Applicants for planning permission are not required to provide ‘sustainability statements’ in terms of the construction, internal layout and performance of dwellings. Applicants now need only meet the Building Regulations and the three optional technical standards relating to water, access and space if these have been adopted by the council. As the WMS states:</td>
<td></td>
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<tr>
<td>“local planning authorities (will) also need to review their local information requirements to ensure that technical detail that is no longer necessary is not requested to support planning applications.”</td>
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<tr>
<td>As stated, applicants need only demonstrate to the Building Control department that they satisfy the Building Regulations. They do not need to do more than this. Other than the optional standard relating to space (the Nationally Described Space Standard) this is not a planning area and the council cannot intrude into this area.</td>
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</table>
| There are many things wrong with the first part of the policy. For example (but not exhaustively), the Council cannot require that an applicant demonstrates that the “lowest level of carbon emissions” has been achieved since the applicant is only required to meet Part L 2013. Similarly, the applicant does not need to show how the highest levels of water efficiency have been achieved since the applicant is only required to meet the optional technical standard for water efficiency that the council has elected to adopt which is 110 litres per person per day (paragraph 4.5.20). The Council cannot require more than this because national policy in the WMS does not allow for this (“local planning authorities...
should not set out in their emerging Local Plans…any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings”

CHP

The policy also requires that all new developments must connect to (C)CHP distribution networks where they exist, or incorporate the necessary infrastructure for connection to future networks. We consider this to be contrary to national policy. The Government’s Productivity Plan (Fixing the Foundations, HM Treasury, July 2015) announced the government’s decision not to proceed with its zero carbon Allowable Solutions carbon offsetting scheme, or with its proposed 2016 increase in on-site energy efficiency standards (page 46). The purpose of this announcement was to reduce the burden of regulation on housebuilders which was ‘hindering competition by raising barriers to entry, adaptation and expansion’ (page 43). The government is concerned that the growing burden of demand is inhibiting the growth of smaller housebuilders (page 46). It is the HBF’s view that having suspended the Allowable Solutions scheme and the 2016 increase in energy efficiency standards, developers are only required to meet Part L 2013 of the Building Regulations. This will not require provision of or connection to CHP systems. Generally, meeting Part L 2013 does not require providing or connecting to CHP systems or contributing to other offsite energy efficiency measures.

The announcement in the Government’s productivity plan post-dates the NPPF. We are aware that paragraph 96 of the NPPF allows local authorities adopt local policies for the support of decentralised energy schemes but we consider that the direction of Government policy has been set by the Productivity Plan. It would not be appropriate for the local authority to specify the manner by which developers achieve their energy requirements under the Building Regulations.

Aside from the question as to whether the Council’s approach accords with national policy, there are potentially viability implications associated with this policy requirement. The DCLG document Housing Standards Review: Cost Impacts (for the DCLG by EC Harris, September 2014) provides the latest costs associated with building to the new Part L 2013. We note that the Council’s Viability Assessment has modelled the cost of building to current Part L 2013 (see paragraph 5.3.20). However, it is hard to know whether this would cover the costs associated with building CHP systems, or connecting to these. The EC Harris report referred to above does conclude that there are costs associated with renewable technologies. Since this is a local plan policy requirement the Council should calculate what it might cost for all schemes to provide CHP systems or to connect up to these.

Carbon reduction

- The Council requires a reduction in carbon emissions of at least 15%. This is unclear. Firstly, it is unclear what the baseline measurement is. Secondly, and more importantly, the policy is unsound because applicants are only required to achieve Part L 2013. The Council is unable to set any other standards relating to the performance of new dwellings other than the three optional technical standards (WMS, 25 March 2015).

Applicants are not required to demonstrate how they have achieved Part L 2013 through energy statements. As the WMS states:

“local planning authorities (will) also need to review their local information requirements to ensure that technical detail that is no longer necessary is not requested to support planning applications.”

In paragraph 4.5.16 the Council refers to zero carbon development. The Government, However, has determined that zero carbon development is unfeasible for the time-being, hence its suspension of the 2016 zero carbon homes requirement. This reference should be deleted from the Local Plan.

Water efficiency
We note paragraph 4.5.20. If the Council wishes to adopt the optional standard for water efficiency then it needs to put this in policy. It cannot introduce this via SPD. It will also need to address the tests set out in the NPPG. One of those tests is viability. It is unclear from the Viability Assessment that has been published (December 2014) whether the Council has assessed this cost.

**Paragraph 4.5.21**

The Council indicates within this paragraph that it may impose other requirements on developers, and lists what these might be. It proposes to decide these on a case-by-case basis. This is contrary to the NPPF in paragraphs 15, 17 and 154 and the underlying principle of the plan-led system. The Local Plan ought to provide clarity for applicants so that decisions can be made without delay. The local plan should not to be starting point for negotiation.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/17565  **Respondent:** 8581505 / Burpham Neighbourhood Forum (Jim Allen)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is **Sound?** ( ), is **Legally Compliant?** ( )

This policy contains a FLA (4 letter acronym) (C)CHP, which is indecipherable.

This is a thirty year document so FLA’s and TLA’s should be spelt out early in the text so in 25 years time it is still understandable on the first read.

“Combined Cooling, Heat and Power (CCHP)
Combined Cooling, Heat and Power (CCHP), or trigeneration as it is also known, is the most economical and environmentally sound way to generate electricity, heat and cooling, making it the ideal solution for organisations which have significant cooling requirements.

CCHP energy schemes integrate Combined Heat and Power (CHP) systems with absorption chillers.

Waste heat provides energy to produce chilled water which is then used for cooling.”

While this policy is ‘admirable’ in thought, in ‘UK practice’ the proposal would work in large factories and barracks style / student accommodation where one central supplier has a responsibility for the whole operation.

For domestic houses (owner occupied) - this ‘communist style’ communal power and heating process is highly contentious. This type of system requires a central ‘boiler/engine/generator’ to feed a number of properties and thus requires a central service provider ‘on site’. We do not believe the policy itself is ‘sustainable’ as it will require the setting up of an ‘independent’ power station with associated company and staff. None of this is mentioned within the overall plan.

As there is no Plan Policy, Proposal, or Aspiration within the plan for such CCHP infrastructure this Policy fails the basic soundness test of being integrated with the rest of the Plan or in fact being deliverable in the life of the Plan.

CCHP for commercial premises is a sound policy, and is welcomed. However for disconnected owner occupied properties, the implications are a challenge. The distribution of hot and cold(chilled) water is unsustainable over wider ranges.
Web research has shown that this ‘new version’ of the old idea has less than 1,000 units worldwide. It is an unproven project notwithstanding the principles are excellent.

This policy needs seriously re-wording to make development sustainable and energy efficient, but not overly onerous on developers never mind the owner occupiers.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** pslp171/2234  **Respondent:** 8581505 / Burpham Neighbourhood Forum (Jim Allen)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy D2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

Sustainable design, Construction and Energy – Inappropriate heading

*Subsection (1) too vague – delete.

4.5.19
Why has this statement been removed? Reinstate. This statement displays serious concern for water supplies; removing it attempts to hide reality.

4.5.30a
Should be removed in full.

*Key Evidence*
The community has not been consulted on the evidence at Reg 18.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** pslp171/2460  **Respondent:** 8585601 / Jennie Kyte  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy D2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**POLICY D2: Sustainable design, construction and energy**

4.5.30 **I object** to the addition of the words: “New buildings, except retail developments in Guildford Town Centre must achieve a reasonable reduction in carbon emissions through the provision of appropriate low and zero carbon technologies in the locality of the development.”

It will not be possible to meet carbon reduction targets, if such exceptions are made. The proposed retail development in North St with housing above should install low carbon technology, such as Combined Heat and Power (CHP).

4.5.37a **The retail development in North St is not just a retail development but also a housing development. The carbon emission reduction requirement should be applied to this site. If this is not viable, the development should not go ahead.**

**I object to the weakening of the carbon emission reduction requirement in para. 4.5.37a**
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2114  Respondent: 8591041 / Surrey Wildlife Trust (Mike Waite)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy D2: Sustainable development, construction and energy.

We welcome this policy, and the apparent importance the Borough places on such matters through its inclusion and prominence in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17180  Respondent: 8591329 / The House of Commons (Anne Milton MP)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I hope GBC will anticipate societal trends and advancing technology. A great deal of work is being done with so called 'smart cities' to enhance people's quality of life and increase efficiency of services to lower cost. We should be looking at new materials that allow buildings to be built faster and cheaper than traditional forms of building. We should be setting standards to reduce the need for lighting and heating. These ideas need to be embraced in the final Local Plan.

---------------

There is a wealth of new technology being explored and in new forms, eg roads that can now be laid with solar panels to generate energy. I understand Greenwich is networking solar panels, energy from water (the Thames) and other sources as it becomes a test bed for smart city energy technology. This information can be used continually to inform and improve people's quality of life in every new building.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12105  Respondent: 8594177 / Michael Conoley Associates (Michael Conoley)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy D2: Sustainable design, construction and energy
The government has withdrawn the Code for Sustainable Homes to encourage development, sustainable design is appropriately and successfully regulated by the Building Regulations. The requirement for applicants to provide energy statements at the planning submission stage which detail a 15% reduction in carbon emissions is at odds with government guidance and will create unnecessary red tape and costs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1265  Respondent: 8608865 / WBDRA. (David Bird)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

WBDRA COMMENTS that there should be an inclusion of Grey Water Usage (using Attenuation Tanks) and Grey Water Recovery

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9855  Respondent: 8627393 / Worplesdon Parish Council (Gaynor White)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

D2 Sustainable Design, construction and energy

This policy should include grey water usage (via attenuation tanks) and grey water recovery.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10092  Respondent: 8640353 / Julian Cranwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We object to Policy D2 Sustainable design, construction and energySustainability should be an overarching ambition, conditioning the whole local plan and running through it, as claimed in the NPPF, “like a golden thread”. It should be set out clearly in Policy S1, not buried away as a minor detail in Policy D2. This policy amounts to “greenwashing”, expounding aspirational environmental targets while ignoring the plan to build dormitory towns across the Green Belt that are environmentally and socially unsustainable. These settlements will bring vastly increased car use and will lead to unacceptable traffic congestion, overstretched social infrastructure, and more greenhouse gas emissions, noise and light pollution. This policy should not be just about saving energy but about preserving the borough’s stock of natural capital,
especially the countryside, from futile attempts to rig the housing market. This policy’s emphasis on Combined Cooling Heating and Power and communal heating networks is meaningless, since no such networks are available locally.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2321  Respondent: 8671969 / Valerie Thompson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

D2 Sustainable design construction and energy

What is sustainability? Surely it means that the infrastructure of an area is also considered when development is planned
I object to the fact the GBC has taken none of these considerations into account when drawing up its Draft Local Plan and
encouraging a further approximately 30,000 cars onto the local roads.

There are no plans for better roads apart from the A3.

There are no plans for extending the Hospital

There are no plans for sufficient school places (Wisley proposed a couple of schools, but only after 500 houses were built, where, in the meantime will the children from these houses go?)

There are no plans for more surgeries (The above statement also applies here)

There will be a considerable increase in light pollution

There will be a considerable increase in noise pollution

There will be a considerable increase in exhaust pollution. (The Wisley site is already polluted severely from the A3/M25 junction)

There are no facilities to supply the Combined Cooling, Heating and Power and Communal Heating networks proposed by GBC

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15203  Respondent: 8672993 / Kes Heffer  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

All measures to improve energy efficiency by better insulation etc. are laudable. However, this policy should explicitly preclude the possibility of building wind-farms or solar electricity farms in the Borough, which are extremely inefficient
forms of energy production. Both suffer from the intermittency problem, and, as a consequence for wind turbines, even the contributions to reducing carbon dioxide emissions are highly dubious. Those analyses rigorously demonstrate that wind developments of various sizes cause extra fuel consumption (and hence carbon dioxide emissions) instead of fuel saving, when compared to electricity production with modern high-efficiency gas turbines only. However, power from so-called renewable sources receives large Government subsidies which are attractive to landowners, and, under the proposed policy D2 would be allowed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT TO POLICY D2 (SUSTAINABLE DESIGN ETC):

- Targets unachievable if Green Belt is covered with amount of housing as proposed, causing traffic chaos, infrastructure failure and unacceptable levels of pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Sustainability should be the main ambition, conditioning the whole local plan and running through it, as claimed in the NPPF, “like a golden thread”. It should be set out clearly in Policy S1.

Your plan wants to build towns in the Green Belt that are environmentally unsustainable. Bringing increased car use and unacceptable traffic congestion, overstretched social infrastructure, and more greenhouse gas emissions, noise and light pollution. It’s counter-intuitive and contradictory.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to POLICY D2 - Sustainable design, construction and energy

- Targets unachievable if Green Belt covered with amount of housing as proposed, causing traffic chaos, infrastructure failure and unacceptable levels of pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy D2 Sustainability

The provision of 8000 homes with the associated increase in traffic is not sustainable; the infrastructure does not exist and the desirable character of the area will be destroyed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9457  Respondent: 8728865 / Neville Bryan  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Object

I do not see how 8000 houses built on the greenbelt meets the definition of sustainable. There will be 16000 additional cars (2 per house is the norm), increased pollution and a biodiversity reduction.

The council is also currently reluctant to do emissions testing due to cost. Air quality testing is something which should be required in planning to protect our environment from overdevelopment and should have a clear policy statement and develop is required by law to meet emissions standards.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16890  Respondent: 8728865 / Neville Bryan  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Object

Sustainability should be a key aim and therefore defined in Policy S1.

We do not see how 8000 houses plus required infrastructure on the Greenbelt, together with the 16000 cars (2 per house is the norm) is in anyway sustainable.

The council is currently reluctant to do emissions testing due to costs. We see this as something required in planning to protect our environment from overdevelopment and should have a clear policy statement.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1141  Respondent: 8776417 / Nici Holland  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

I do not see how 8000 houses plus required infrastructure on the Greenbelt, together with the 16000 cars (2 per house is the norm) is in anyway sustainable.

The council is currently reluctant to do emissions testing due to costs. We see this as something required in planning to protect our environment from overdevelopment and should have a clear policy statement.

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? ( )

<table>
<thead>
<tr>
<th>1. We should be supporting the move to a low carbon environment, reducing pollution, reusing previously developed land (brownfield sites), conserving heritage assets, making the fullest use of public transport and cycling.</th>
</tr>
</thead>
<tbody>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
</tr>
<tr>
<td>Attached documents:</td>
</tr>
</tbody>
</table>

**Comment ID:** PSLPP16/14439  **Respondent:** 8801953 / Sarah Relf  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**POLICY D2**

I object because sustainability should run through the whole local plan, as claimed in the NPPF, “like a golden thread”. It should be set out clearly in Policy S1, not as minor detail in Policy D2. This policy amounts to “greenwashing”: expounding aspirational environmental targets while ignoring the fact that building so many new homes across the Green Belt will be environmentally and socially unsustainable (bringing unacceptable traffic congestion, overstretched schools and medical facilities, and more pollution)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/15777  **Respondent:** 8836129 / Roger Shapley  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The emphasis on CCHP (Combined Cooling Heating and Power) and communal heating networks is misplaced when no such networks are currently locally available.

The imposition of aspirational environmental targets ignores the fact that building dormitory communities is environmentally unsustainable. These all require increased car use and will lead to increased congestion with associated air pollution and higher carbon dioxide emissions; a few solar panels on roofs will not compensate for the considerable environmental cost.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/16227  **Respondent:** 8839041 / Jon Maslin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to Policy D2 Sustainable design, construction and energy.

Sustainability should be an overarching ambition, conditioning the whole local plan and running through it, as claimed in the NPPF, ‘like a golden thread’. It should be set out clearly in Policy S1, not buried away as a minor detail in Policy D2.

This policy amounts to ‘greenwashing’, expounding aspirational environmental targets while ignoring the plan to build dormitory towns across the Green Belt that are environmentally and socially unsustainable. These settlements will bring vastly increased car use and will lead to unacceptable traffic congestion, overstretched social infrastructure, and more greenhouse gas emissions, noise and light pollution. This policy should not be just about saving energy but about preserving the borough’s stock of natural capital, especially the countryside, from attempts to rig the housing market.

This policy’s emphasis on Combined Cooling Heating and Power and communal heating networks is difficult to understand, since no such networks are available locally.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3204  Respondent: 8850433 / Ian Doherty  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

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: PSLPP16/2318  Respondent: 8851905 / Jonathan Mitchell  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Guildford still has a population of Swifts (Apus apus). This is threatened by work and structural changes to existing buildings. Nesting facilities for Swifts should be incorporated into a proportion of new buildings, so as to maintain the population of Swifts in Guildford.

Targets for light pollution should be set for all new developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17788  Respondent: 8858113 / Ramsey Nagaty  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D2
<table>
<thead>
<tr>
<th><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong></th>
<th><strong>No</strong></th>
<th><strong>is Sound?</strong></th>
<th><strong>No</strong></th>
<th><strong>is Legally Compliant?</strong></th>
<th><strong>()</strong></th>
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**I object** to Policy D2 Sustainable design, construction and energy

Sustainability should be an overarching ambition, conditioning the whole local plan and running through it, as claimed in the NPPF, “like a golden thread”. It should be set out clearly in Policy S1, not buried away as a minor detail in Policy D2.

This policy amounts to “greenwashing”, expounding aspirational environmental targets while ignoring the plan to build dormitory towns across the Green Belt that are environmentally and socially unsustainable. These settlements will bring vastly increased car use and will lead to unacceptable traffic congestion, overstretched social infrastructure, and more greenhouse gas emissions, noise and light pollution. This policy should not be just about saving energy but about preserving the borough’s stock of natural capital, especially the countryside, from futile attempts to rig the housing market.

This policy’s emphasis on Combined Cooling Heating and Power and communal heating networks is meaningless, since no such networks are available locally.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/2433  **Respondent:** 8858433 / Eric Peters  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

**Policy D2 -Sustainable Design, Construction and Energy**

I object. Building in the Green Belt will lead to increased traffic congestion and pollution. The infrastructure can't cope. The policy emphasises combined cooling and heating networks where no such networks are available locally.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/2232  **Respondent:** 8860897 / Julia Shaw  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

**Policy D2 -Sustainable Design, Construction and Energy**

I OBJECT to this policy

The emphasis on energy and waste hierarchies and reduction of carbon emissions as part of building design are welcomed.

However, the emphasis on CCHP (Combined Cooling Heating and Power) and communal heating networks seems curious – no such networks are currently locally available.
There is an element of “greenwashing” – the imposition of aspirational environmental targets while ignoring the simple fact that building dormitory towns is environmentally unsustainable.

These all require increased car use and will lead to increased congestion and so air pollution and higher carbon dioxide emissions and a few solar panels on roofs will not compensate for the considerable environmental cost.

Sustainability should be an overarching ambition, conditioning the whole local plan and running through it, as claimed in the NPPF, “like a golden thread”. It should be set out clearly in Policy S1, not buried away as a minor detail in Policy D2.

This policy amounts to “greenwashing”, expounding aspirational environmental targets while ignoring the plan to build dormitory towns in the Green Belt that are environmentally and socially unsustainable. These settlements will require vastly increased car use and will lead to unacceptable traffic congestion, overstretched social infrastructure, and higher greenhouse gas emissions and noise and light pollution. This policy should not be just about saving energy but about preserving the borough’s stock of natural capital, especially the countryside, from futile attempts to rig the housing market.

This policy’s emphasis on Combined Cooling Heating and Power and communal heating networks is meaningless, since no such networks are available locally.

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 D1 (BETTER PLACES):

- Poor monitoring.
- No force given to vernacular or historic design guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4631  Respondent: 8906113 / Sally Clarke  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

One of the reasons for me moving to West Horsley 3 years ago was to move to a more rural location, with less traffic, for health reasons as I have a chronic illness. I am concerned that the proposals to add houses, and with a much greater density than currently, would lead to an increase in air pollution in the area as there would be more people using cars.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18542  Respondent: 8914945 / Nichola Armstrong  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Policy D1 and D2. This is a weak Policy because no thought or vision has been attached to conservation areas or historic value which makes an area unique. By building outside the Town Centre and urban area, The Plan encourages congestion on our road network so I can't see how the reduction of the Borough's footprint is actually going to work. building outside the Town Centre and urban areas is not sustainable development and will not reduce the carbon footprint. The roads will just become more and more congested because all of the development is outside of the town and urban areas. Any changes to the way energy infrastructure is supplied should be made to the Town and urban areas first because high density building uses more energy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15154  Respondent: 8926529 / Annie Cross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
**Policy D2 - Sustainable Design, Construction and Energy**

I agree that all new developments, whatever the size, should conform to the above.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID: PSLPP16/72  Respondent: 8929057 / East Horsley Parish Council (Nick Clemens)  Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**POLICY D2: Sustainable design, construction & energy**

We 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: PSLPP16/8784  Respondent: 8933185 / Peter See  Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

4.5.10 Policy D2: Sustainable Design, Construction and Energy

Note: The heading 'Climate Change and the Low Carbon Economy' should be 'bold'.

Lack of water supply is yet another reason for not building all the homes which you plan to build, especially in the Green Belt. See also Paragraph 4.5.38.


(C)CHP - Please give the full name of these distribution networks before '(C)CHP'.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID: PSLPP16/16055  Respondent: 8941761 / FLGCA (Paul Kassell)  Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We generally support this policy, although we note that as far as we know there are no CCHP networks 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:** PSLPP16/17591  **Respondent:** 8944737 / Martin Grant Homes (Martin Grant Homes)  **Agent:** Barton Willmore (Michael Knott)

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

8.1 MGH objects to the requirement under ‘Sustainable development’ which requires proposals for development to be supported by the submission of a sustainability statement. In particular, the requirement to set out how they will deliver “the lowest level of carbon emissions (direct and embodied) that is achievable” is in conflict with the NPPF and is unsound.

8.2 Having regard to the high standards of energy and water required by national Building Regulations, it is unreasonable in our view to require developers to provide evidence of viability and feasibility in support of planning applications 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:** PSLPP16/9382  **Respondent:** 8948385 / Gillian Eve  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

Policy D2: Sustainable design, construction and energy

I OBJECT. What is the point of setting out aims for sustainable design, etc when the rest of the planned local plan is all about unsustainable development: destruction of Green Belt, housing development based on unreasonably high population projections, urbanisation of villages etc.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/16169  **Respondent:** 8948385 / Gillian Eve  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I OBJECT. What is the point of setting out aims for sustainable design, etc when the rest of the planned local plan is all about unsustainable development: destruction of Green Belt, housing development based on unreasonably high population projections, urbanisation of villages etc.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17309  Respondent: 8967233 / University of Surrey (University of Surrey)  Agent: Terence O'Rourke (Luke Vallins)

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The University supports this policy and welcomes the recognition in the policy that effective sustainable design and construction measures need to be practical and viable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13103  Respondent: 8993121 / Shelagh Yeomans  Agent:  

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy D2: Sustainable design, construction and energy

I OBJECT to this policy

• The emphasis on CCHP (Combined Cooling Heating and Power) and communal heating networks seems curious – no such networks are currently locally available.
• There is an element of “greenwashing” – the imposition of aspirational environmental targets while ignoring the simple fact that building dormitory towns is environmentally unsustainable.
• These all require increased car use and will lead to increased congestion and so air pollution and higher carbon dioxide emissions and a few solar panels on roofs will not compensate for the considerable environmental cost.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8681  Respondent: 9050337 / Nigel Geary  Agent:  

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

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?
### POLICY D2 Sustainable design, construction and energy

Generally OBJECT The emphasis on energy and waste hierarchies and reduction of carbon emissions as part of building design are welcomed. However, the emphasis on CCHP (Combined Cooling Heating and Power) and communal heating networks seems curious – no such networks are currently locally available. There is an element of “Greenwashing” – the imposition of aspirational environmental targets while ignoring the simple fact that building dormitory towns is environmentally unsustainable. These all require increased car use and will lead to increased congestion and so air pollution and higher carbon dioxide emissions and a few solar panels on roofs will not compensate for the considerable environmental cost.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

### Policy D2: Sustainable Design

Object (not justified, effective nor consistent with national planning policy in respect of NPPF paragraph 182)

WPI considers that Policy D2 is unjustified and contrary to national planning policy on the basis that it is largely repetitive of matters which should be covered by the Building Regulations (Part L). The policy requirement for all developments to be zero carbon, based on regulated energy use, would place the Borough as out of step with many Districts.

The Government’s Ministerial Statement of 25 March 2015 set out that that from the date the Deregulation Bill is given royal assent (26 March 2015), Local Plans should not include any additional (to the new “optional building regulations” and the new national space standards) local technical standards or requirements relating to the construction, layout or performance of new dwellings. As set out within GBC’s own Sustainability Topic Paper:

"Written ministerial statements are material planning considerations. The Deregulation Bill has now been given royal assent so Local Plans should not set technical standards for construction, layout or performance of dwellings except the optional building regulations, the planning space standard and energy performance requirements up to the equivalent of Code for Sustainable Homes Level 4, without a compelling reason to do so."

The whole purpose of the Standards Review was to impose consistency across the country, to assist with the delivery of development and thus matters such as water and energy efficiency are addressed by the Building Regulations. Paragraph
95 of the NPPF states that when setting local requirements for a building's sustainability, local planning authorities must do so in a way consistent with the Government’s zero carbon buildings policy and adopt nationally described standards. Following the royal assent of the Housing and Planning Bill the Government’s proposed Zero Carbon Standard has been deleted and in its stead, the Government has introduced a clause to the Bill which commits to a review of the energy efficiency standard for new homes in building regulations. There is no time scale nor is there any specific criteria for the review.

As set out within the Planning Practice Guidance (PPG), local planning authorities have the option to set additional technical requirements exceeding the minimum standards required by Building Regulations in respect of access and water. However, in doing so the local planning authority will need to gather evidence to determine whether there is a need for additional standards in their area, and justify setting appropriate policies in their Local Plans (Reference ID: 56-002-20160519). It is not clear where the evidence behind the requirements of Policy D2 is located within the Local Plan evidence base.

The requirement for all developments to connect or make provision for Combined Heat and Power (CHP) is unjustified, and un-evidenced. There are some locations where CHP can be made both viable and feasible, however, these are typically higher density developments, in urban locations. There are limited, if any, examples nationally of major and large scale developments of lower densities (below 50 dph) enabling CHP. NPPF paragraph 173 states that pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking.

WPI understands that Policy D2 is intended to align with national legislation, policy and guidance by offering strong support for low and zero carbon and decentralised energy with a particular focus on Combined Heat and Power (CHP). However, WPI suggests that the wording of Policy D2 be amended to make clear the policy is ‘encouraging’ rather than requiring measures to be met.

Finally, the policy is ineffective, as it makes no reference to viability or feasibility factors, in requiring the implementation of zero carbon. There are no references to any ‘allowable solutions’, which are off-site sources of energy generation, which may count towards carbon offset.

**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)
4.24. Furthermore, the WMS made it clear that the optional new national technical standards should only be required through any new local plan policy if they address a clearly evidenced need and where their impact on viability has been considered. GBC, in its updated Sustainability Topic Paper (June 2017), has acknowledged that it should not seek to exceed the Building Regulations requirements unless there is a compelling reason to do so (para 2.14). Essentially there needs to be a specific, well evidence, local justification for setting standards that are above those in the Building Regulations.

4.25. The Updated Sustainability Topic Paper refers to national objectives and targets but there is limited, if any, local justification provided and with the exception of brief references to the 2013 Guildford Borough Environmental Sustainability and Climate Change Study (ESCC), it is not clear where the evidence to support the Council’s approach is located.

4.26. GBC’s argument for the approach in policy D2 is that there is no “quantifiable target” but rather, a design standard that is set by a “qualitative standard” to achieve the lowest level of carbon emissions or the highest level of efficiency. Whilst no specific figures are stated in the policy, the policy continues to enable GBC to raise objections to development on the basis that standards, in excess of those set out in the Building Regulations, are not being met, and thus enables GBC to exceed the requirements of the Standards Review, the purpose of which was fundamentally to assist with the faster delivery of development. The policy, or associated text should at the very least, make it clear that the targets being sought will reflect current Building Regulations requirements.

4.27. The Focused Amendments have sought to make the policy wording clearer and in some instances more flexible, and this results in a policy that is more effective. However, whilst it is agreed that the wording is clearer, carbon reduction targets have increased, without the relevant local justification being provided. Although some flexibility has now been inserted into the policy paragraph 9, WPI’s objection is maintained in respect of policy D2 as regards the carbon requirements.

4.28. WPI recommended, in representations to the Submission GBLP that the policy requirement for Combined Heat and Power (CHP) was amended to be encouraging. It was highlighted that WPI believed this to align more appropriately with national policy and guidance supporting carbon reduction and decentralised energy, and ensuring that viability of CHP was considered. It is disappointing to see that there has been no change to policy D2 in relation to CHP provision and therefore the flexibility required to policy D2 is not in place. Subsequently, WPI maintains their objection on the basis that the NPPF clearly recognises that pursuing sustainable development requires careful attention to viability and costs (para 173).

4.29. WPI also recommended that policy D2 was updated to include reference to viability and feasibility in relation to support for zero carbon development. However, no reference to such factors is included, and subsequently, WPI remain of the view that the policy is ineffective.

Changes Sought

4.30. The policy should reflect the Housing Standards Review, and therefore require a fair and reasonable approach to carbon reduction, which takes full account of economic viability and technical feasibility factors.

4.31. The requirement for CHP connection for any development should be amended, to make clear that the policy is ‘encouraging’ rather than requiring CHP to be provided.

4.32. Carbon reduction requirements should be returned to 15% as per the Submission Plan, unless GBC can provide sufficient, local justification to require this standard.
Policy D2: Sustainable Design
Page 97

The policy should reflect the Housing Standards Review, and therefore require a fair and reasonable approach to carbon reduction, which takes full account of economic viability and technical feasibility factors.

The wording of Policy D2 should be revised to reflect the Housing Standards Review and not repeat or seek to conflict with Part L of the Building Regulations.

The requirement for CHP connection for any development should be amended, to make clear that the policy is ‘encouraging’ rather than requiring so that it states that "...all new developments are encouraged to connect to CHP...."

(Pages 109 and 110).

The policy (paragraph 9) has changed to required 20% rather than 15% carbon reduction. However, measures are to be provided in the locality rather than on site.

A new paragraph 10 has been added to the policy. This states that “A Use Classes” in Guildford will not be subject to the requirements of para 9.

Wording of policy D2 has slightly changed from “must” to “are required to”.

The suggested text relating to CHP connections has not been included in the Focused Amendments.

WPI welcome the clarification to the policy to provide additional flexibility, and hence the policy is more effective.

Clarification Requested (Objection Maintained). However, WPI question the justification for a carbon reduction increase in the amendment policy.

Further commentary on this representation is provided in Section 4.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14959  Respondent: 9327009 / sp2 Consulting Limited (Stephen Parker)  Agent:

I OBJECT. The emphasis on energy and waste hierarchies and reduction of carbon emissions as part of building design are welcomed. However, the emphasis on CCHP (Combined Cooling Heating and Power) and communal heating networks seems curious – no such networks are currently locally available. There is an element of “Greenwashing” – the imposition of aspirational environmental targets while ignoring the simple fact that building dormitory towns is environmentally unsustainable. These all require increased car use and will lead to increased congestion and so air pollution and higher carbon dioxide emissions and a few solar panels on roofs will not compensate for the considerable environmental cost.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Policy D2: Sustainable Design, Construction and Energy

I ACCEPT this policy as far as it goes, but it needs some extension.

It is important to include a specific comment that the higher initial construction cost of energy efficient homes will not be allowable as a grounds for viability waivers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Partly SUPPORT / partly OBJECT (on 3 distinct grounds)

1. The almost certain uptake of electric vehicles will require charging points in the vast majority of dwellings within the timescale of the Local Plan. Therefore this Policy should make provision for electric charging points to be installed in all new dwellings and in conversions of existing buildings to domestic residences.
2. Paragraph 4.5.18b is poorly worded. How is it proposed (within the planning system) to offset the carbon that will be emitted during the occupied life of a building?
3. In paragraph 4.5.30, why is Guildford town centre exempted from the requirement for new buildings to “achieve a reasonable reduction in carbon emissions of at least 20 percent …”? Similarly, the second half of paragraph 4.5.37a, indicates that retail developments in the town centre will be exempted from the general requirements for low carbon development. Climate change is a serious global problem, and will not be solved unless meaningful targets are pursued on all fronts. This Policy needs to ensure that residential and businesses premises both meet the environmental standards for the benefit of everybody. Overall these paragraphs need to be significantly tightened up.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
2.39 The Government has adopted a clear stance of moving away from locally set standards in respect of renewable energy for housing schemes, with such matters instead addressed through the Building Regulations. As such we are concerned that the policy is unsound in that it is not consistent with national policy. In addition we have concerns regarding the practicality of implementing certain of the detailed criteria currently proposed as discussed below.

Sustainable Development

2.40 Criterion 1b requires the sustainability statement to set out how the development will deliver “the lowest level of carbon emissions (direct and embodied).” Similarly, criterion 1c requires “the highest levels of energy and water efficiency.” As currently it is considered that the proposed policy wording is ineffective.

2.41 No clarity is provided as to what constitutes the lowest or highest levels. For instance, should a new form of emerging technology be able to deliver a lower level of carbon emissions but this is not currently widely available this would seemingly fail the currently proposed policy test. Similarly if there is a form of technology available but this would be prohibitively expensive and would render the development unviable, this would again fail the proposed policy test. Further clarity and flexibility must therefore be introduced to the proposed policy wording.

Renewable, low carbon and decentralised energy

2.42 The policy requires all new developments to “connect to (C)CHP distribution networks where they exist, or incorporate the necessary infrastructure for connection to future networks, unless it can be clearly demonstrated that doing so is not feasible or that utilising a different energy supply would be more sustainable.”

2.43 Clearly (C)CHP is unlikely to be delivered in all locations. The proposed policy wording does provide some flexibility in respect of demonstrating if it is feasible, however this test needs to be applied to the site itself and the wider context. Whilst it may be feasible for the development to provide the necessary infrastructure for connection to future networks, if it can be robustly demonstrated that the location in general is not feasible for a future network to be delivered then this should equally apply. The proposed policy text should be updated to clarify this approach.

Carbon reduction

2.44 The policy also seeks to require new buildings to achieve a reduction in carbon emissions of at least 20%. If the principle of this requirement is accepted, we continue to have concerns regarding the potential implications for the viability of developments. Whilst the implications of the proposed increase to 20% have been assessed in the Assessment of the Viability of Carbon Emission Targets for New Builds (April 2017) prepared by Evora Edge, this has not been considered in combination with the other proposed revised policy requirements through an updated viability assessment. The current requirement is therefore considered to be unsound in that it is neither justified nor effective.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT. Sustainability should be an overarching ambition, conditioning the whole local plan and running through it, as claimed in the NPPF, “like a golden thread”. It should be set out clearly in Policy S1, not buried away as a minor detail in Policy D2.

This policy amounts to “greenwashing”, expounding aspirational environmental targets while ignoring the plan to build dormitory towns in the Green Belt that are environmentally and socially unsustainable. These settlements will require vastly increased car use and will lead to unacceptable traffic congestion, overstretched social infrastructure, and higher greenhouse gas emissions and noise and light pollution. This policy should not be just about saving energy but about preserving the borough’s stock of natural capital, especially the countryside, from futile attempts to rig the housing market.

This policy’s emphasis on Combined Cooling Heating and Power and communal heating networks is meaningless, since no such networks are available locally.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Policy D2 – Sustainable design, construction and energy

I OBJECT. I agree with the definitions of sustainability and I am passionate about the issues. We ourselves have installed photovoltaic cells, rainwater harvesting for use in the house and a ground-source heat pump. The Local Plan seems to be paying lip service to the need for sustainability, but the council’s track record on delivery is woeful.

The traffic resulting from the vast increases in housing will result in more cars on the already congested roads of our villages, increasing pollution levels, noise and damage to the environment.

The references to CCHP appear to have been cut and pasted from the document “Model policies for energy in neighbourhood plans” (https://www.regensw.co.uk/communities/wp-content/uploads/sites/5/2016/05/Energy-in-Neighbourhood-Planning-model-policies-with-context.pdf). Of course, GBC are using it for the Local Plan rather than a Neighbourhood Plan. The Local Plan omits the final section of the document: “Before energy policies are developed for a neighbourhood plan, a clear objective on energy for the NP needs to be established following consultation with the community. Appropriate policies for the area can then be developed through an evidence base gathering and consultation process. These policies need to be reviewed together to ensure that they form a cohesive whole – reinforcing, rather than contradicting each other."

Should this not have happened already if it is to be such an integral part of the plan?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/13707</th>
<th>Respondent: 10782625 / Heather Alexander</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2</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 OBJECT TO POLICY D2 (SUSTAINABLE DESIGN ETC):

Targets unachievable if Green Belt covered with amount of housing as proposed, causing traffic chaos, infrastructure failure and unacceptable levels of pollution.

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: PSLPP16/4340</th>
<th>Respondent: 10782689 / Murray Dudgeon</th>
<th>Agent:</th>
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I object that housing on the Green Belt will increase traffic, lead to slower journey times and increase pollution and danger on the already busy roads.

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: PSLPP16/342</th>
<th>Respondent: 10799169 / Neal Basson</th>
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POLICY D2 Sustainable design, construction and energy

Generally OBJECT The emphasis on energy and waste hierarchies and reduction of carbon emissions as part of building design are welcomed. However, the emphasis on CCHP (Combined Cooling Heating and Power) and communal heating networks seems curious – no such networks are currently locally available. There is an element of “Greenwashing” – the imposition of aspirational environmental targets while ignoring the simple fact that building dormitory towns is environmentally unsustainable. These all require increased car use and will lead to increased congestion and so air pollution and higher carbon dioxide emissions and a few solar panels on roofs will not compensate for the considerable environmental cost.

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<th>Comment ID: PSLPP16/17539</th>
<th>Respondent: 10799425 / Guildford Greenbelt Group (Susan Parker)</th>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6648  Respondent: 10829121 / Julie Brown  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to POLICY D2 - Sustainable design, construction and energy

• Targets unachievable if Green Belt covered with amount of housing as proposed, causing traffic chaos, infrastructure failure and unacceptable levels of pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3483  Respondent: 10843361 / Natalie Brown  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to POLICY D2 - Sustainable design, construction and energy

• Targets unachievable if Green Belt covered with amount of housing as proposed, causing traffic chaos, infrastructure failure and unacceptable levels of pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14458  Respondent: 10846625 / Frank Drennan  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D2
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 D2 “Sustainable design, construction and energy” on the grounds that;

1.2 Sustainability should be an overarching ambition, conditioning the whole local plan and running through it, as claimed in the NPPF, “like a golden thread”. It should be set out clearly in Policy S1, not buried away as a minor detail in Policy D2.
1.3 This policy amounts to “greenwashing”, expounding aspirational environmental targets while ignoring the plan to build dormitory towns across the Green Belt that are environmentally and socially unsustainable. These settlements will bring vastly increased car use and will lead to unacceptable traffic congestion, overstretched social infrastructure, and more greenhouse gas emissions, noise and light pollution. This policy should not be just about saving energy but about preserving the borough’s stock of natural capital, especially the countryside, from futile attempts to rig the housing market.

1.4 This policy’s emphasis on Combined Cooling Heating and Power and communal heating networks is meaningless, since no such networks are available locally.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8854  Respondent: 10857889 / William Kyte OBE  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to this policy

The emphasis on energy and waste hierarchies and reduction of carbon emissions as part of building design are welcomed.

The building of dormitory towns is unsustainable and will require increased car use. This will lead to increased congestion, more air pollution and higher carbon dioxide emissions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/18606  Respondent: 10858977 / Angela Otterson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Policy D2 Sustainable design, construction and energy

Sustainability should be an overarching ambition, conditioning the whole local plan and running through it, as claimed in the NPPF, “like a golden thread”. It should be set out clearly in Policy S1, not buried away as a minor detail in Policy D2.

This policy amounts to “greenwashing”, expounding aspirational environmental targets while ignoring the plan to build dormitory towns across the Green Belt that are environmentally and socially unsustainable. These settlements will bring vastly increased car use and will lead to unacceptable traffic congestion, overstretched social infrastructure, and more greenhouse gas emissions, noise and light pollution. This policy should not be just about saving energy but about preserving the borough’s stock of natural capital, especially the countryside, from futile attempts to rig the housing market.
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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: PSLPP16/16032</th>
<th>Respondent: 10859553 / MARK Curtis</th>
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POLICY D2 SUSTAINABLE DESIGN

I object to Policy D2 Sustainable design, construction and energy

Sustainability should be an overarching ambition, conditioning the whole local plan and running through it, as claimed in the NPPF, “like a golden thread”. It should be set out clearly in Policy S1, not buried away as a minor detail in Policy D2.

This policy amounts to “greenwashing”, expounding aspirational environmental targets while ignoring the plan to build dormitory towns across the Green Belt that are environmentally and socially unsustainable. These settlements will bring vastly increased car use and will lead to unacceptable traffic congestion, overstretched social infrastructure, and more greenhouse gas emissions, noise and light pollution. This policy should not be just about saving energy but about preserving the borough’s stock of natural capital, especially the countryside, from attempts to rig the housing market.

This policy’s emphasis on Combined Cooling Heating and Power and communal heating networks is difficult to understand, since no such networks are available locally.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/18144</th>
<th>Respondent: 10910273 / Lynda M Williams</th>
<th>Agent:</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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<tr>
<th>Comment ID: PSLPP16/11333</th>
<th>Respondent: 10923297 / Matthew Burnham</th>
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I OBJECT TO POLICY D2 (SUSTAINABLE DESIGN ETC):

- Targets unachievable if Green Belt covered with amount of housing as proposed, causing traffic chaos, infrastructure failure and unacceptable levels of pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1720  Respondent: 10933793 / Julia Tilbury  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY D2 - Sustainable design, construction and energy

I OBJECT. Sustainability should be an overarching ambition, conditioning the whole local plan and running through it, as claimed in the NPPF, "like a golden thread". It should be set out clearly in Policy 51, not buried away as a minor detail in Policy 02.

This policy amounts to "greenwashing", expounding aspirational environmental targets while ignoring the plan to build dormitory towns across the Green Belt that are environmentally and socially unsustainable. These settlements will bring vastly increased car use and will lead to unacceptable traffic congestion, overstretched social infrastructure, and more greenhouse gas emissions, noise and light pollution. This policy should not be just about saving energy but about preserving the borough's stock of natural capital, especially the countryside, from futile attempts to rig the housing market.

This policy's emphasis on Combined Cooling Heating and Power and communal heating networks is meaningless, since no such networks are available locally.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1692  Respondent: 10933857 / C J Tilbury  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY D2 - Sustainable design, construction and energy

I OBJECT. Sustainability should be an overarching ambition, conditioning the whole local plan and running through it, as claimed in the NPPF, "like a golden thread". It should be set out clearly in Policy 51, not buried away as a minor detail in Policy 02.

This policy amounts to "greenwashing", expounding aspirational environmental targets while ignoring the plan to build dormitory towns across the Green Belt that are environmentally and socially unsustainable. These settlements will bring vastly increased car use and will lead to unacceptable traffic congestion, overstretched social infrastructure, and more greenhouse gas emissions, noise and light pollution. This policy should not be just about saving energy but about...
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This policy's emphasis on Combined Cooling Heating and Power and communal heating networks is meaningless, since no such networks are available locally.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/15377  **Respondent:** 10935201 / Cathryn Walton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

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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:** PSLPP16/9214  **Respondent:** 10985057 / Anthony Parker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

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POLICY D2 Sustainable design, construction and energy - I OBJECT. The emphasis on energy and waste hierarchies and reduction of carbon emissions as part of building design are welcomed. However, the emphasis on CCHP (Combined Cooling Heating and Power) and communal heating networks seems curious – no such networks are currently locally available. There is an element of “Greenwashing” – the imposition of aspirational environmental targets while ignoring the simple fact that building dormitory towns is environmentally unsustainable. These all require increased car use and will lead to increased congestion and so air pollution and higher carbon dioxide emissions and a few solar panels on roofs will not compensate for the considerable environmental cost.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
Policy D2 - Sustainable Design, Construction and Energy

I object.

Building in the Green Belt will lead to increased traffic congestion and pollution.

The infrastructure can't cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Policy D2 point 9 commendable increase. New developments should also include charging points for electric vehicles. We should be planning for the future.

4.5.16a about sustainable development should say appropriate to the development instead of proportionate

4.5.30 retails buildings should not be exempt from the carbon reduction. All measures apply equally across the board. No distinctions should be made between housing and retail.

4.5.37a should be removed

4.5.30a allows for a way out of meeting carbon emission needs. It should be removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to Policy D2 Sustainable design, construction and energy. Sustainability should be an overarching ambition, conditioning the whole local plan and running through it, as claimed in the NPPF, “like a golden thread”. It should be set out clearly in Policy S1, not buried away as a minor detail in Policy D2. This policy amounts to “greenwashing”, expounding aspirational environmental targets while ignoring the plan to build dormitory towns across the Green Belt that are environmentally and socially unsustainable. These settlements will bring vastly increased car use and will lead to unacceptable traffic congestion, overstretched social infrastructure, and more greenhouse gas emissions, noise and light pollution. This policy should not be just about saving energy but about preserving the borough’s stock of natural capital, especially the countryside, from attempts to rig the housing market. This policy’s emphasis on Combined Cooling Heating and Power and communal heating networks is difficult to understand, since no such networks are available locally.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1878  Respondent: 11037441 / Bryan Joseph  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

There is no explicit statement of energy use objectives of the buildings. One would suggest a bias to encourage local generation, Combined Heat and Power schemes, Solar Power usage would have also featured in the document.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/258  Respondent: 11051521 / J and M Baylis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

4.5.37a: it is not obvious why viability should be a reason for exemption. Exactly the same argument could be applied to affordable housing:

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/8840  Respondent: 11071553 / Nicholas Roberts  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY D2 (SUSTAINABLE DESIGN ETC) – I object because the policy simply cannot be implemented if the countryside is developed with amount of housing as proposed, causing traffic gridlock, infrastructure breakdown and dangerous levels of pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14336  Respondent: 11080097 / David & Julia Hunt  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Policy D2 Sustainable design, construction and energy Sustainability should be an overarching ambition, conditioning the whole local plan and running through it, as claimed in the NPPF, “like a golden thread”. It should be set out clearly in Policy S1, not buried away as a minor detail in Policy D2. This policy amounts to “greenwashing”, expounding aspirational environmental targets while ignoring the plan to build dormitory towns across the Green Belt that are environmentally and socially unsustainable. These settlements will bring vastly increased car use and will lead to unacceptable traffic congestion, overstretched social infrastructure, and more greenhouse gas emissions, noise and light pollution. This policy should not be just about saving energy but about preserving the borough’s stock of natural capital, especially the countryside, from attempts to rig the housing market. This policy’s emphasis on Combined Cooling Heating and Power and communal heating networks is difficult to understand, since no such networks are available locally.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2403  Respondent: 11157345 / John Harrison  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

With regard to power requirements, sustainable solutions close to significant development should be explored such as solar, possibly on the roofs of new dwellings, and the suitability of the Downs as a site for wind turbines, especially perhaps associated with the Research Park and the University area - where a modern and progressive image is appropriate - should be explored. In many senses turbines can be aesthetically beautiful, particularly once what they achieve and what they avoid is known.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Much of this section could be ‘unsustainable’ legally as it stands. The text would possibly benefit from a study of the careful drafting of the Building Regulations. An example is the deletion of “that are achievable” in 1(c). That leaves an open-ended requirement that could be taken to mean the wholly closed levels that manned space craft achieve.

*Obj – carefully re-draft.*

Para (7) would, as written, require new dwellings everywhere [eg the country ends of East Horsley] to be ‘connection-ready’. It has to be understood that ‘connection-ready’ means a sizing of heating systems appropriate for {C}CHP, and so probably unsuitable for whatever is a more suitable method for the location [eg maybe heat pumps].

*Redraft?*

Para (9) now specifies a carbon emission reduction of 20% on-what? [presumably the Building Regulations, but it should say so].

It remains wholly unclear why this figure was chosen. The supporting papers contain a study which costs the extra works required – this form of study has been carried out multiple times by various authorities, there is nothing unusual about Guildford and there seems no reason therefore why Guildford should have funded a further study, with perhaps its own set of potential errors. In depth studies are always carried out by the Government’s Building Regulation Advisory Committee – most are published and linked research reports are available. Those give reasoned explanation as to choice, and it would obviously be helpful to Members if these were abstracted and made available if members are insistent on going down a particularly pace-setting path.

Meanwhile Members should be aware that there are widespread reports in the industry of building failures arising out of energy conservation requirements running ahead of the ability of the majority of designers and constructors. And of failure, sometimes remarkable failure, to achieve predicted savings, arising out of the inability of building users to use to the full what has been supplied to them.

A graphic, terrible example, is a recent fire in a high block of flats, where externally applied thermal insulation applied to upgrade the energy conservation of that block largely caused a major human tragedy. The most efficient thermal insulation nearly always is highly flammable.

It would be far more sensible, if more boring, to follow national guidance.

*Obj - reconsider*

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
28.1 I object to Policy D2 Sustainable design, construction and energy

28.2 Sustainability should be an overarching ambition, conditioning the whole local plan and running through it, as claimed in the NPPF, “like a golden thread”. It should be set out clearly in Policy S1, not buried away as a minor detail in Policy D2.

28.3 This policy amounts to “greenwashing”, expounding aspirational environmental targets while ignoring the plan to build dormitory towns across the Green Belt that are environmentally and socially unsustainable. These settlements will bring vastly increased car use and will lead to unacceptable traffic congestion, overstretched social infrastructure, and more greenhouse gas emissions, noise and light pollution. This policy should not be just about saving energy but about preserving the borough’s stock of natural capital, especially the countryside, from futile attempts to rig the housing market.

28.4 This policy’s emphasis on Combined Cooling Heating and Power and communal heating networks is meaningless, since no such networks are available locally.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8942  Respondent: 15107297 / Ian McQuattie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY D2 (SUSTAINABLE DESIGN ETC):

- Targets unachievable if Green Belt covered with amount of housing as proposed, causing traffic chaos, infrastructure failure and unacceptable levels of pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13751  Respondent: 15227905 / Nigel Alexander  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY D2 (SUSTAINABLE DESIGN ETC):

Targets unachievable if Green Belt covered with amount of housing as proposed, causing traffic chaos, infrastructure failure and unacceptable levels of pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2317  Respondent: 15244097 / Persimmon Homes (Craig Hatton)  Agent:

I OBJECT TO POLICY D2 (SUSTAINABLE DESIGN ETC):

Targets unachievable if Green Belt covered with amount of housing as proposed, causing traffic chaos, infrastructure failure and unacceptable levels of pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy 02: Sustainable design, construction and energy

This policy is unsound in parts and conflicts with national policy: This policy does not support the requirements of sustainable development

Sustainable development is a golden thread which runs through the National Planning Policy Framework. As a result, all development should be achieving sustainability as part of overarching planning policy. Persimmon Homes ensure that all development sites are in sustainable locations and look to achieve the highest levels of sustainability.

This Policy states that strong support will be given to proposals for zero carbon development. As part of such development the following are set out as points that must be delivered as part of any new development:

• The highest levels of energy and water efficiency that are achievable and,
• The lowest level of carbon emissions that is achievable

As with Policy H2 regarding Affordable Homes, Persimmon would not support proposals that result in unviable development. There is ambiguity as to what 'the lowest level of carbon emissions' means and we have reservations about its enforcement. Further down in the policy there is mention of a requirement to achieve a reasonable reduction of at least 15%. It is unclear as to whether this figure relates to the lowest level of carbon emissions that is achievable or if this is a set figure which has to be achieved. In addition to this, the planning contributions SPD has an existing requirement for a reduction of 10% for carbon emissions.

Persimmon Homes have reservations that any change from the existing reduction of 10% would have an impact on the viability of future schemes. We are unsure as to whether it would be practicable for delivery of the level of housing required if an increase in reduction was required. In addition to this, Persimmon also has reservations about the practicality of having all developments connect to (C)CHP distribution networks as there are a number of areas within Guildford where such a connection will not be possible. This will therefore have a further impact on the viability of schemes and will restrict developments to particular areas, in a borough which is already heavily restricted by Green Belt. It is arguable that this policy does not a-line with sustainable development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy reps.pdf (1.0 MB)
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I trust that everything is in order and that the above comments are helpful, however, should you require any further help then please do not hesitate to contact me.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1748  Respondent: 15244641 / Wesley Raynbird-Tilbury  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY D2 - Sustainable design, construction and energy

I OBJECT. Sustainability should be an overarching ambition, conditioning the whole local plan and running through it, as claimed in the NPPF, "like a golden thread". It should be set out clearly in Policy 51, not buried away as a minor detail in Policy 02.

This policy amounts to "greenwashing", expounding aspirational environmental targets while ignoring the plan to build dormitory towns across the Green Belt that are environmentally and socially unsustainable. These settlements will bring vastly increased car use and will lead to unacceptable traffic congestion, overstretched social infrastructure, and more greenhouse gas emissions, noise and light pollution. This policy should not be just about saving energy but about preserving the borough's stock of natural capital, especially the countryside, from futile attempts to rig the housing market.

This policy's emphasis on Combined Cooling Heating and Power and communal heating networks is meaningless, since no such networks are available locally.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Comment ID: PSLPP16/1812</th>
<th><strong>Respondent:</strong> 15247265 / Aileen Aitcheson</th>
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**POLICY D2: Sustainable design, construction & energy**

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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<tr>
<th>Comment ID: PSLPP16/1836</th>
<th><strong>Respondent:</strong> 15247745 / Brian Aitcheson</th>
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**POLICY D2: Sustainable design, construction & energy**

I support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<th>Comment ID: PSLPP16/2280</th>
<th><strong>Respondent:</strong> 15275009 / Compton Parish Council (Fiona Curtis)</th>
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We object to Policy D2 Sustainable design, construction and energy. Sustainability should be an overarching ambition, conditioning the whole local plan and running through it, as claimed in the NPPF, “like a golden thread”. It should be set out clearly in Policy S1, and not presented as a minor detail in Policy D2. This policy amounts to “greenwashing”, expounding aspirational environmental targets while ignoring the plan to build dormitory towns across the Green Belt that are environmentally and socially unsustainable. These settlements will bring vastly increased car use and will lead to unacceptable traffic congestion, overstretched social infrastructure, and more greenhouse gas emissions, noise and light pollution. This policy should not be just about saving energy but about preserving the borough’s stock of natural capital, especially the countryside, from attempts to manipulate the housing market. This policy’s emphasis on Combined Cooling Heating and Power and communal heating networks is difficult to understand, since no such networks are available locally.

There is also no mention of future proofing homes for older people so that they may maintain independent living within the home. The implementation of technology that will permit telecare or telemedicine is perfectly achievable given the high level of broadband in Surrey.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<tr>
<th>Comment ID: PSLPP16/10961</th>
<th>Respondent: 15282625 / Kelly Graves</th>
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<th>Comment ID: PSLPP16/14096</th>
<th>Respondent: 15299201 / Samira Abdullah</th>
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<th>Comment ID: PSLPP16/2869</th>
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• The emphasis on CCHP (Combined Cooling Heating and Power) and communal heating networks seems curious – no such networks are currently locally available.
• There is an element of “greenwashing” – the imposition of aspirational environmental targets while ignoring the simple fact that building dormitory towns is environmentally unsustainable.

These all require increased car use and will lead to increased congestion and so air pollution and higher carbon dioxide emissions and a few solar panels on roofs will not compensate for the considerable environmental cost.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3457  Respondent: 15320737 / Steven Brown  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to POLICY D2 - Sustainable design, construction and energy

• Targets unachievable if Green Belt covered with amount of housing as proposed, causing traffic chaos, infrastructure failure and unacceptable levels of pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3153  Respondent: 15323041 / Jane Doherty  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

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: PSLPP16/4304  Respondent: 15359137 / George Sprankling  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the increased pollution that a large number of houses would create.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/4832</th>
<th>Respondent: 15377953 / cctvtraining.com ltd (Gordon Tyerman)</th>
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**POLICY D2 Sustainable design, construction and energy**

**GROUNDS FOR OBJECTION** The emphasis on energy and waste hierarchies and reduction of carbon emissions as part of building design are welcomed. However, the emphasis on CCHP (Combined Cooling Heating and Power) and communal heating networks seems curious – no such networks are currently locally available. There is an element of “Greenwashing” – the imposition of aspirational environmental targets while ignoring the simple fact that building dormitory towns is environmentally unsustainable. These all require increased car use and will lead to increased congestion and so air pollution and higher carbon dioxide emissions and a few solar panels on roofs will not compensate for the considerable environmental cost.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<th>Comment ID: PSLPP16/6794</th>
<th>Respondent: 15438945 / Jacqueline Davies</th>
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**I object to POLICY D2 - Sustainable design, construction and energy**

- Targets unachievable if Green Belt covered with amount of housing as proposed, causing traffic chaos, infrastructure failure and unacceptable levels of pollution.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<th>Comment ID: PSLPP16/14376</th>
<th>Respondent: 15446401 / Louise Yandle</th>
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**I OBJECT TO POLICY D2 (SUSTAINABLE DESIGN ETC):**

- Targets unachievable if Green Belt covered with amount of housing as proposed, causing traffic chaos, infrastructure failure and unacceptable levels of pollution.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<th>Comment ID: PSLPP16/7643</th>
<th>Respondent: 15450817 / Audrey Gachen</th>
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<td><strong>I support this policy.</strong></td>
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</tbody>
</table>
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9080  Respondent: 15478785 / Alicia Grainger  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The targets are unsustainable if the Green Belt is covered with the amount of housing as proposed, causing traffic chaos, infrastructure failure and unacceptable levels of pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10047  Respondent: 15495873 / Gerard Duvé  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Sustainable Design, Construction and Energy

I agree that all new developments, whatever the size, should conform to the above.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11086  Respondent: 15509057 / Richard Golding  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT. Sustainability should not be confined to just the building it should also apply to access to the buildings and with public transport slowly being reduced these settlements will bring vastly increased car use and will lead to unacceptable traffic congestion, overstretched social infrastructure, and more greenhouse gas emissions, noise and light pollution. Build dormitory towns across the Green Belt that are environmentally and socially unsustainable are totally unacceptable. This policy should not be just about saving energy but about preserving the borough’s stock of natural capital, especially the countryside, from futile attempts to rig the housing market. This policy’s emphasis on Combined Cooling Heating and Power and communal heating networks is meaningless, since no such networks are available locally. And developers will have no interest in installing these because it will affect their bottom line

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/11282  Respondent: 15570145 / Owen Eszeki  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy D2 - Sustainable Design, Construction and Energy

I agree that all new developments, whatever the size, should conform to the above.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11281  Respondent: 15570209 / Emily Cross  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy D2 - Sustainable Design, Construction and Energy

I agree that all new developments, whatever the size, should conform to the above.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11459  Respondent: 15571425 / Monika Neczaj  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY D2 (SUSTAINABLE DESIGN ETC):

• Targets unachievable if Green Belt covered with amount of housing as proposed, causing traffic chaos, infrastructure failure and unacceptable levels of pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11488  Respondent: 15571553 / Darren Carbine  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY D2 - Sustainable design, construction and energy - I OBJECT.
Sustainability should be the overriding ambition of the entire local plan and running through it, as claimed in the NPPF, “like a golden thread”. It should be set out clearly in Policy S1, not buried away as a minor detail in Policy D2. These settlements will bring vastly increased car use and will lead to unacceptable traffic congestion, overstretched social infrastructure, and more greenhouse gas emissions, noise and light pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12945  Respondent: 15586017 / C Maslin  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY D2 SUSTAINABLE DESIGN

I object to Policy D2 Sustainable design, construction and energy.

Sustainability should be an overarching ambition, conditioning the whole local plan and running through it, as claimed in the NPPF, ‘like a golden thread’. It should be set out clearly in Policy S1, not buried away as a minor detail in Policy D2.

This policy amounts to ‘greenwashing’, expounding aspirational environmental targets while ignoring the plan to build dormitory towns across the Green Belt that are environmentally and socially unsustainable. These settlements will bring vastly increased car use and will lead to unacceptable traffic congestion, overstretched social infrastructure, and more greenhouse gas emissions, noise and light pollution. This policy should not be just about saving energy but about preserving the borough’s stock of natural capital, especially the countryside, from attempts to rig the housing market.

This policy’s emphasis on Combined Cooling Heating and Power and communal heating networks is difficult to understand, since no such networks are available locally.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14271  Respondent: 15601953 / Stephen Yandle  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

• Targets unachievable if Green Belt covered with amount of housing as proposed, causing traffic chaos, infrastructure failure and unacceptable levels of pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14337  Respondent: 15602177 / Julia Hunt  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2
I object to Policy D2 Sustainable design, construction and energy. Sustainability should be an overarching ambition, conditioning the whole local plan and running through it, as claimed in the NPPF, “like a golden thread”. It should be set out clearly in Policy S1, not buried away as a minor detail in Policy D2. This policy amounts to “greenwashing”, expounding aspirational environmental targets while ignoring the plan to build dormitory towns across the Green Belt that are environmentally and socially unsustainable. These settlements will bring vastly increased car use and will lead to unacceptable traffic congestion, overstretched social infrastructure, and more greenhouse gas emissions, noise and light pollution. This policy should not be just about saving energy but about preserving the borough’s stock of natural capital, especially the countryside, from attempts to rig the housing market. This policy’s emphasis on Combined Cooling Heating and Power and communal heating networks is difficult to understand, since no such networks are available locally.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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I OBJECT. Sustainability should be an overarching ambition, conditioning the whole local plan and running through it, as claimed in the NPPF, “like a golden thread”. It should be set out clearly in Policy S1, not buried away as a minor detail in Policy D2.

This policy amounts to “greenwashing”, expounding aspirational environmental targets while ignoring the plan to build dormitory towns across the Green Belt that are environmentally and socially unsustainable. These settlements will bring vastly increased car use and will lead to unacceptable traffic congestion, overstretched social infrastructure, and more greenhouse gas emissions, noise and light pollution. This policy should not be just about saving energy but about preserving the borough’s stock of natural capital, especially the countryside, from futile attempts to rig the housing market.

This policy’s emphasis on Combined Cooling Heating and Power and communal heating networks is meaningless, since no such networks are available locally.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15710  Respondent: 15619041 / Jack Cross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy D2 - Sustainable Design, Construction and Energy

I agree that all new developments, whatever the size, should conform to the above.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/18691  Respondent: 15619201 / Michael Conoley Associates (James Deverill)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy D2: Sustainable Design, Construction and Energy

The government has withdrawn the Code for Sustainable Homes to encourage development because sustainable design is appropriately and successfully regulated by the Building Regulations. The requirement for applicants to provide energy statements at the planning submission stage which detail a 15% reduction in carbon emissions is at odds with government guidance and will create unnecessary red tape and costs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15749  Respondent: 15623745 / Stella May  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to Policy D2 Sustainable design, construction and energy Sustainability should be an overarching ambition, conditioning the whole local plan and running through it, as claimed in the NPPF, “like a golden thread”. It should be set out clearly in Policy S1, not buried away as a minor detail in Policy D2. This policy amounts to “greenwashing”, expounding aspirational environmental targets while ignoring the plan to build dormitory towns across the Green Belt that are environmentally and socially unsustainable. These settlements will bring vastly increased car use and will lead to unacceptable traffic congestion, overstretched social infrastructure, and more greenhouse gas emissions, noise and light pollution. This policy should not be just about saving energy but about preserving the borough’s stock of natural capital, especially the countryside, from attempts to rig the housing market. This policy’s emphasis on Combined Cooling Heating and Power and communal heating networks is difficult to understand, since no such networks are available locally.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I OBJECT TO POLICY D2 (SUSTAINABLE DESIGN ETC): • Targets unachievable if Green Belt covered with amount of housing as proposed, causing traffic chaos, infrastructure failure and unacceptable levels of pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Policy D2 – Sustainable design, construction and energy

The Environment Agency has designated the Thames Water region to be “seriously water stressed” which reflects the extent to which available water resources are used. Future pressures on water resources will continue to increase and key factors are population growth and climate change.

Water conservation and climate change is a vitally important issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore, Thames Water supports water conservation and the efficient use of water and the references to this in paragraphs 4.5.10 and 4.5.19, but consider that there should be clearer reference in Policy D2 itself.

Thames Water support the mains water consumption target of 110 litres per head per day as set out in the NPPG (Paragraph: 015 Reference ID: 56-015-20150327) and consider that this should be covered in Policy D2.

Thames Water have a water efficiency website:

http://www.thameswater.co.uk/save-water/3786.htm
Customers can discover how you can start saving water, help protect the environment, reduce your energy bill and even cut your water bill if you have a meter. You can calculate your water use, see how you compare against other Thames Water customers and the Government's target, and get lots of hints and tips on how to save water. Thames Water customers, can also order a range of free devices to help save water. The Policy/supporting text could make reference to this guidance.

However, managing demand alone will not be sufficient to meet increasing demand and Thames Water adopt the Government’s twin-track approach of managing demand for water and, where necessary, developing new sources, as reflected in the latest Thames Water Water Resource Management Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17397  Respondent: 15682465 / Nick Beesly  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Design Policies: I am fully supportive of Design Policies D1"Making better places", D2 Sustainable design, construction and energy" and D3 "Historic Environment".

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17614  Respondent: 15688481 / Sally Lescher  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Policy D2 Sustainable design, construction and energy

Sustainability should be an overarching ambition, conditioning the whole local plan and running through it, as claimed in the NPPF, “like a golden thread”. It should be set out clearly in Policy S1, not buried away as a minor detail in Policy D2.

This policy amounts to “greenwashing”, expounding aspirational environmental targets while ignoring the plan to build dormitory towns across the Green Belt that are environmentally and socially unsustainable. These settlements will bring vastly increased car use and will lead to unacceptable traffic congestion, overstretched social infrastructure, and more greenhouse gas emissions, noise and light pollution. This policy should not be just about saving energy but about preserving the borough’s stock of natural capital, especially the countryside, from attempts to rig the housing market.

This policy’s emphasis on Combined Cooling Heating and Power and communal heating networks is difficult to understand, since no such networks are available locally.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
POLICY D2 SUSTAINABLE DESIGN, CONSTRUCTION AND ENERGY

It is important that new development achieves a good level of design that respects existing character, however, the Council have a balancing exercise to ensure that they make the maximum productive use of identified sites in order to ensure that the most important ‘natural, built and heritage environments are protected.’ Including making maximum use of sustainably located sites within and adjoining existing settlements.

The Council must also be careful to ensure that unrealistic design standards or the constraints of historic character do not undermine the delivery of new growth.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

2.40 The Government has adopted a clear stance of moving away from locally set standards in respect of renewable energy for housing schemes, with such matters instead addressed through the Building Regulations. The NPPG makes clear that additional requirements on technical standards can only be applied with regard to water, accessibility and nationally described space standards. As such we are concerned that the policy is unsound in that it is not consistent with national policy. In addition we have concerns regarding the practicality of implementing certain of the detailed criteria currently proposed as discussed below.

Sustainable Development

2.41 Criterion 1b requires the sustainability statement to set out how the development will deliver “the lowest level of carbon emissions (direct and embodied).” Similarly, criterion 1c requires “the highest levels of energy and water efficiency.” As currently it is considered that the proposed policy wording is ineffective.

2.42 No clarity is provided as to what constitutes the lowest or highest levels. For instance, should a new form of emerging technology be able to deliver a lower level of carbon emissions but this is not currently widely available this would seemingly fail the currently proposed policy test. Similarly if there is a form of technology available but this would be prohibitively expensive and would render the development unviable, this would again fail the proposed policy test. Further clarity and flexibility must therefore be introduced to the proposed policy wording.

Renewable, low carbon and decentralised energy
2.43 The policy requires all new developments to “connect to (C)CHP distribution networks where they exist, or incorporate the necessary infrastructure for connection to future networks, unless it can be clearly demonstrated that doing so is not feasible or that utilising a different energy supply would be more sustainable.”

2.44 Clearly (C)CHP is unlikely to be delivered in all locations. The proposed policy wording does provide some flexibility in respect of demonstrating if it is feasible, however this test needs to be applied to the site itself and the wider context. Whilst it may be feasible for the development to provide the necessary infrastructure for connection to future networks, if it can be robustly demonstrated that the location in general is not feasible for a future network to be delivered then this should equally apply. The proposed policy text should be updated to clarify this approach.

Carbon reduction

2.45 The policy also seeks to require new buildings to achieve a reduction in carbon emissions of at least 20%. If the principle of this requirement is accepted, we continue to have concerns regarding the potential implications for the viability of developments. Whilst the implications of the proposed increase to 20% have been assessed in the Assessment of the Viability of Carbon Emission Targets for New Builds (April 2017) prepared by Evora Edge, this has not been considered in combination with the other proposed revised policy requirements through an updated viability assessment. The current requirement is therefore considered to be unsound in that it is neither justified nor effective.

Policy D2 – Further clarity is required to ensure the proposed policy wording is effective. Flexibility should also be introduced into the proposed policy wording.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
This policy includes requirements in regard to additional standards to meet carbon reductions. This requirement is not consistent with national policy, and therefore any additional standards such as those relating to carbon reduction in Policy D2 should not be included 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:** pslp171/1208  **Respondent:** 17348225 / Thakeham Homes (Katherine Munro)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy D2: Sustainable design, construction and energy

This policy includes requirements in regard to additional standards to meet carbon reductions. This requirement is not consistent with national policy, and therefore any additional standards such as those relating to carbon reduction in Policy D2 should not be included 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:** pslp171/1601  **Respondent:** 17406209 / Guildford Vision Group (Andrew Black)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY D2: Sustainable design, construction and energy

3.56 GVG supports the laudable policies on ensuring new development minimises the need for heat and energy through quality design and construction, and requiring developers to provide statements as to how this is to be achieved. However, GVG is concerned that the Plan has only taken a very narrow view of the “Energy” position, both in the UK and locally, only to minimum NPPF requirements. Requiring developers to utilise only Renewable Energy Sources and then not making any provision for them in the Plan will, in effect, limit the amount of new development possible in the Borough. The GBC-commissioned report by the Centre for Sustainable Energy concluded that only very limited amounts of Renewable Generation was “deployable”.

3.57 The Policy section on Energy does not extend far enough into either the general shortage of supply of any energy or the demand side. It does not allow for, amongst others, the impact of electric vehicles, the use of Smart Grids and Battery Farm Storage potential. There is also no mention of the potential for Carbon Sequestration.

3.58 GVG takes the view that a review of the general energy provision, both from the National Grid and Renewable Sources needs to be included in the plan. The Local Distribution network operator needs to be consulted as to what power availability there is to support the Borough’s aspirations for both economic and domestic development.

3.59 Options for Renewable Local Embedded Energy Centres need to be part of any Plan, along with the consideration of the application of smart grids and battery storage farms. Financial support from the CIL levy could support retrofitting on large warehouse roofs at Slyfield and other big industrial estates, for instance, as GBC is the freehold owner of a number of the industrial estates. Advanced Thermal treatment is in wide use throughout Scandinavia, Europe and the Far East and...
there are an increasing number of plants in the UK. This has the potential to provide substantial renewable power and heat locally. The minimum requirement should be for all new development to be linked into Smart Grids which then manage and reduce significantly the power usage automatically.

3.60 GVG believe a far more proactive approach is needed to the consideration of energy and heat provision in the Plan, leading our town towards a low and zero carbon future whilst still promoting growth, new jobs and homes. As it is, the Plan seeks merely to pass this on to individual developers to deal with the matter on a piecemeal basis.

3.61 Only a comprehensively masterplanned town centre will enable sustainable energy to be harnessed and employed successfully and productively. The masterplan approach favoured by GVG would enable sites to be planned in a conjoined way and make it possible to deliver a unique energy network in the town centre with the ability for future phases of development to plug into this in later years of the Plan process. Piecemeal planning will not achieve that outcome and the town centre is one of only three areas in the borough where such benefits can be achieved.

3.62 Section 4 of policy D2 sets out that combined cooling heating and power (CCHP) networks will be strongly supported and encouraged. However, the current piecemeal approach being taken to different sites within the town centre by GBC will hamper the viability and deliverability of a CCHP network. The Plan is silent on any potential sites for CCHP central facilities, GVG believes the Slyfield Regeneration Proposals offers potential to provide a ‘state of the art’ CCHP facility.

3.63 Overall, the aims of this policy need to be fundamentally reconsidered and the council must recognise the role which a properly masterplanned town centre has to play in the delivery of 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: pslp171/2100  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 D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

6.1 This policy sets out the Council’s aspirations for sustainable features to be integrated into all development in the Borough, new or existing. To this end, the Council requires that all development must be supported by a Sustainability Statement which details how the proposal will perform in terms of efficiency and embodied carbon emissions. This by itself is a further onerous requirement set by the Council and it is unclear why such measures for new build are necessary, when standards set as part of evolving Building Regulations (Part L).

6.2 This policy also introduces the requirement for connection to Combined Heat and Power (CHP) networks, where achievable. In addition the Policy seeks to achieve a reduction in carbon emissions through renewable and low carbon technologies. As part of the latest consultation document, the proposed level of renewable development sought has been increased from 15% to 20%. RPS considers that this matter has not been properly considered to date and the latest amendment only worsens the position in relation to the soundness of the policy. One of the principal soundness issues the policy faces is the consideration of viability.

6.3 The Council’s October 2016 Local Plan and Viability Study (LPVS) recognises that this policy has cost implications (Table 3.1 refers), however it has failed to capture the extent of the costs associated with development. The LPVS indicates at Paragraph 5.3.32 that the Council was considering a 15% reduction in carbon reduction, is similar to the ‘Merton Rule’, adopted by Merton Council in 2003, which seeks 10% on-site renewable provision. As a result of this, a build cost of 2.5% has been factored into the viability assumptions.
6.4 The actual position is somewhat different, as the Council is not seeking a carbon reduction, but expresses a preference for low carbon technologies. The LPVS is therefore incorrect in assuming that the Council’s previous 15% figure was akin to the Merton Rule, indeed it was 5% higher, meaning that the Council’s modelling of this in the LPVS was incorrect. The new consultation document takes this further still, requiring 20% low carbon/renewable sources should be provided with new development. There is no policy basis for this figure and the financial implications of this have not been tested by the Council to even see whether this is a viable proposition.

6.5 Merton Council no longer apply the Merton Rule, acknowledging that this planning policy has since been superseded by changes to building regulations, which seek to implement a fabric first approach to a reduction in carbon emissions, as indicated in the Council’s Energy Hierarchy. Building Regulations are constantly evolving to take into account new approaches to carbon reduction. It is therefore considered that this policy as currently drafted is not soundly based in evidence and Government policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/1171</th>
<th>Respondent: 17979553 / Land to the East of White Lane, Ash (Sir or Madam)</th>
<th>Agent: Vortal Properties Ltd (Robert Symons)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy D2</td>
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Whilst in principle the increased carbon reduction requirement from 15 per cent to 20 per cent is acceptable, the inclusion of the wording in 4.5.30a ‘the financial viability of the requirements set out in Policy D2 will be considered as part of the planning application process’ is supported to recognise potential viability implications.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Total records: 141.
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

Document part: Policy D3 - Historic environment
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16017</th>
<th>Respondent: Historic England (Alan Byrne)</th>
<th>Agent: 8555425</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Guildford Borough Local Plan: Strategy and Sites 2013-2033

The Submission Local Plan seeks to achieve an appropriate balance between needs of protecting environmental qualities, including the historic environment, and the necessary growth and development to ensure Guildford’s continued vitality and economic, social and environmental sustainability. In its high incidence of references to heritage and the historic environment, and the role this plays in achieving sustainable development, the plan largely succeeds in this respect.

There are a few matters of detail that Historic England would like to see addressed in the final version of the plan, but we do not think these are fundamental impediments to its adoption.

The heritage evidence base, referred to as being contained in the GBC Historic Environment Information (April 2016) requires further work; we note this is still in draft form and could be enhanced by inclusion of assessments of significance and value of historic environment as a whole and constituent assets. It would be useful to identify any actions necessary to sustain and enhance the significances of the historic environment and, in particular, how issues affecting the long-term sustainability of heritage assets, such as this at risk, may be addressed.

A clearer explanation of how this evidence links to and underpins a positive strategy for the historic environment in the Local Plan should be included.

We support Policy P1: Surrey Hills Area of Outstanding Natural Beauty in particular the intention to protect objects of historical significance.

Re. Policy E7: Guildford Town Centre; we broadly support both the Vision (p 84) and policy for the town centre. A key characteristic of and a significant factor in its success is the historic environment, focussed on the setted High Street, and the range and concentration of heritage assets and features (ref. para 4.4.68). However, it will be important to proactively sustain these qualities and integrate their protection and enhancement into efforts to improve the retail and associated offer of the town, and we would like to see the wording of the policy strengthened in this respect; for instance, by the addition of an additional bullet point to this effect in the first paragraph of the policy or by explicitly connecting this policy to Policy D3.

We support Policy D1: Making better places.

We think that Policy D3: Historic environment is weak in its wording though supported by a good introduction and an appropriate reasoned justification. The weakness in the policy arises from its focus being reactive, and we would suggest a more proactive form of wording is sought that reflects some of the intentions set out para 4.5.45. As with other areas of policy, the NPPF requires the local plan to actively promote and support actions to sustain, enhance and enjoy the historic environment (ref. paras 126 and 157, final bullet) addressing, in particular, heritage at risk.

We support Policy D4: Development in urban areas and inset villages. In view of the proposed removal of a number of historic villages form the Green Belt it is suggested, where appropriate, that conservation area appraisals are updated and revised to ensure any new development respects and reinforces the character, distinctiveness and setting of the settlements (this could be linked to Policy D3).

Allocated Sites - with regards to allocated sites, Historic England will be pleased to advise on development proposals as they come forward in respect of any effects on the historic environment or heritage assets within or in proximity to the sites. Some of the more significant (strategic) sites will require archaeological investigation / assessment prior to
development especially where there is known to be historical activities that may be retain structures or remains of heritage significance (e.g. at former Wisley Airfield, heritage assessment needed in relation to the sites historic association with aviation development/innovation).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6281  Respondent: 8557985 / Artington Parish Council (Philip Gorton)  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Artington’s contribution to the Borough’s heritage

Residents passionately believe that Mount Browne and The University of Law sites should be considered as an integral part of the wider environmental setting. This setting represents a unique feature of the Borough's heritage, yet disappointingly is not recognised as a separate entity in the Draft Local Plan.

Broadly, the setting covers the area contained within the boundaries of the small parish of Arlington, other important features of which include:

- to the north, the historic North Downs Way and also Sandy Lane, the latter with several houses of great architectural interest;
- to the east, the River Wey crossed by North Downs Way, with St Catherine’s Hill and its chapel;
- to the south, outstanding views over a rural landscape and more houses of architectural interest along the Old Portsmouth Road.

With its interconnecting network of footpaths, the whole of this area is very attractive and accessible to visitors, with the attendant benefits they bring to the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17684  Respondent: 8561377 / The Guildford Society (Julian Lyon)  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

104. The Guildford Society response to this consultation will include both the Town Centre and Urban Guildford.

105. The Guildford Society has a well-publicised suite of policy documents seeking to protect and enhance the character of Guildford, which depends considerably upon its Heritage Buildings, its Conservation Areas and its Topography as a Gap Town within an Area of Outstanding Beauty and our aspirational policy of “Greening the Approaches”.

106. The Local Plan is very dependent on the provision of infrastructure, which if it is delivered at all, will be towards the end of the plan Period. The Design & Heritage Knowledge Group reiterates the concern to ensure that development does
not take place until the necessary infrastructure is approved.

107. Constraints cannot be managed on a site by site basis. Good or bad, early proposals will succeed and later proposals will fail— without control, this will not provide the degree of control or predictability that would be expected from a Local Plan process.

108. Large infrastructure projects and modal shift will take many years to achieve, and the plan does not seem to allow for this delay.

109. Once again, the D&H Group echoed that Social Housing is needed throughout the Borough and is concerned about how to enforce the 40% aspiration.

110. Section 3.2 in the LP Document refers to "exemplary design". This reads well, but; “Exemplary Design” means very good and suitable to be copied. It does not require designs to be fit for purpose or respect the character of the area. This is an example of weak language creating loopholes for inappropriate development. [see also comments under Planning Group regarding the South East Regional Design Panel]

111. It also says "All development within the town centre will need to respect and enhance the unique setting and historical character of the town and be of the highest design and environmental standards." This is welcome; But what about respecting the setting and historical character of the rest of Guildford Borough. It is not just Conservation Areas that need respect. Where people live is also important.

112. Policy P1 uses the phrase “conserve and/or enhance the setting and views of the AONB” is weak, especially to someone not familiar with the topography of Guildford. Parts of the AONB are visible from the Town Centre and there are views from the AONB across Guildford Town, in particular the views from Henley Fort, the Chantries and through the Wey Gap. I would suggest that “conserve and/or enhance the setting and views into and out of the ANOB” would be clearer and therefore easier to manage.

113. The Local Plan does make reference to the Central Government’s “Planning Practice Guidance on Natural Environment – Landscape”, published in March 2014. But only by saying that the AONB Management plan is a material consideration in determining planning applications within and adjacent to the AONB.

114. The Local Plan should emphasize the importance of protecting the setting of AONBs. There is a statutory duty imposed upon planning authorities by the Countryside and Rights of Way Act 2000, Paragraph 3, to have regard to the purposes of AONB designation when considering development proposals situated outside an AONB.

115. These words from the Rights of Way Act 2000 should be included in the Local Plan. “The duty is relevant in considering development proposals that are situated outside National Park or Area of Outstanding Natural Beauty boundaries, but which have an impact on the setting of, and implementation of, the statutory purposes of these protected areas”.

116. Policy D3 4.5.42 states that “Non designated heritage assets are identified by the local authority; the borough’s Local List includes over 200 buildings and structures and the Register of Historic Parks and Gardens includes 52 sites”.

117. Policy D3: Key Evidence lists the Local List, conservation area character appraisals and management plans and existing Conservation Area Character Appraisals. The Local Plan does not, however, provide any protection to these 252 heritage assets or reference any plan to get them designated.
118. In particular, many existing Conservation Areas, particularly in the town centre have no “existing Conservation Area Character Appraisal” or at least none published and accessible on the Council Website. Without a Character Appraisal it is difficult or impossible to judge the merits of a planning application in a Conservation Area, or to uphold decisions at appeal. The Local Plan should include a commitment for every Conservation Area to have a published and accessible Character Appraisal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1868  Respondent: 8561377 / The Guildford Society (Julian Lyon)  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY D3 – Historic environment

aaaaa) We agree the amended wording of Policy D3.

bbbbbb) Paragraph 4.5.42 is acceptable but the character assessments are ten years old and should at least be reviewed to confirm they are current and defensible.

cccccc) In paragraph 4.5.42a, there is reference to ‘sites of archaeological significance’. There needs to be a plan showing where it is considered archaeological remains may be discoverable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6180  Respondent: 8562273 / The Clandon Society (Christopher Dean)  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY D3 - Historic environment

We object to this policy as it is very weak and we do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets. Taken together with the current Council policy of “sweating assets” we fear this policy leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17435  Respondent: 8563201 / West Horsley Parish Council (Sam Pinder)  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
POLICY D3: Historic environment

West Horsley contains a wide range of heritage assets which make an important contribution to the look and feel of the village and its character. WHPC fully supports this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

8.I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
This policy doesn’t go far enough. I, therefore object to policy D3 Historic Environment.  

This policy clashes with the strongly pro-development agenda of the rest of the plan and fails to address the contradiction. History is unamenable to improvement, so the policy should commit the Council firmly to protecting and preserving our heritage assets from development. Instead, the specific policy pledge to “support development” that might “enhance” heritage assets leaves wide scope for abuse in the form of destructive commercialization and financial leveraging of relevant sites. This policy is based on the false premise that Guildford’s heritage is inherently in decay. This is a developer’s charter – a short step away from the idea that the historic environment needs to pay its way to be preserved. The Council’s reviews of Guildford Museum and the Electric Theatre support this interpretation. Whatever the “reasoned justification”, the actual policy wording in the blue box leaves too many loopholes. Development close to historical assets is harmful and should be expressly prohibited. This policy fails to meet the requirements of NPPF paragraphs 126 and 131-133. 

We are very lucky as we have several noted historians in Guildford who really do understand history and its relevance and importance and not just in terms of buildings or how to make money from it. They are however not listed or even consulted (according to them). Indeed, their opinions are often unwelcome which does not give me faith in the sincerity of this policy. 

History is more than just buildings, it can apply to gardens and aspects that have influenced the changes in the town and villages. The area next to the fire station in Guildford has one of the biggest prehistoric finds of flint weaponry, yet few know about it. GBC was given the opportunity to purchase the home that Lewis Carroll stayed in but did not, this was a lost opportunity. Quarry Street is awash with offices, yet could be a unique historic quarter if it were conserved rather than exploited. 

4.5.45 I disagree that GBC meets NPPF requirements. The Conservation dept. at GBC is so small (1 permanent member of staff and possibly a part-timer, I think), that it cannot work effectively. If GBC wishes to take this policy seriously it must put adequate resources in place to make it workable. I recently notified the department of a house that met Grade II listing requirements but was pointed to the English Heritage website and hence completed all the forms and site visits and justification, myself. The Rectory in Compton is now Grade II listed, but simply stating that you support such endeavors is not good enough. Resources must be in place to permit timely and adequate response and action. 

4.5.42 There is a historic monument in the grounds of Blackwell Farm, this area is completely neglected and any visitor or walker would not even know it was there as it is covered in weeds and bushes. I have seen this for myself and if GBC had the resources to send someone out on a site visit they would have to concur. Blackwell Farm is also the site of a Historic Park and given its close proximity to Watts Gallery and Limnerslease and Greyfriars, the entire area could become an area of local and National importance but instead, the University wishes to build 1,800 houses on it? How does that comply with this policy? 

What changes (2016)/further amendments (2017) do you suggest should be made to the document? 

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/2381</th>
<th>Respondent: 8570273 / Fiona Curtis</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy D3</td>
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</tbody>
</table>
| Policy D3 Historic Environment | Adequate resources must be given to ensure the policies can be carried out. Conversely, to the statement that conservation and economic sustainable growth are complimentary objectives, this is not always the case and policies must be put into place to better define outcomes where the two do not co-exist. For instance, there is an ancient monument within Blackwell Farm that is overgrown and completely neglected. In what way will policies that support economic growth also support the restoration and setting of this monument and its surroundings (historic royal park)?

Many conservation reports / assessments are 20–30 years old and to date resources are not in place to keep up to date with this.

Last year I suggested that the Arts and Craft building (1912) that was the former Rectory in Compton, should be listed. It was agreed but again due to lack of resources it was necessary to source and provide all the evidence that was needed myself.

The policy does not provide a framework for the enjoyment of the historic environment and in order to fulfill 4.5.45, resources must be put into place to fulfill the programme.

Key Evidence

Planning practice guide has been removed as has the NPPG, without any justification? These should remain in place unless justification is supplied for their removal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/13053  Respondent: 8573793 / Harry Eve  Agent:</th>
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</thead>
<tbody>
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</tbody>
</table>

81. It is worth pointing out here that this policy could come into conflict with highways infrastructure developments that will be found to be necessary to keep traffic moving at junctions in limited space in built-up areas where there are historic buildings. Examples of two such locations are Ripley and Effingham. A major constraint on the housing number 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: PSLPP16/7025  Respondent: 8575617 / Effingham Parish Council (Ian Symes)  Agent:</th>
</tr>
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<tbody>
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</table>

D3 Design– Historic Environment
### Comment ID: PSLPP16/17566  Respondent: 8581505 / Burpham Neighbourhood Forum (Jim Allen)  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

<table>
<thead>
<tr>
<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>This Policy fails to encompass ‘artefacts’ and fails to provide ongoing a location where artefacts are stored and made available to the public.</td>
</tr>
</tbody>
</table>

The Plan is lacking inclusion of an Archaeology Policy in respect of these virgin Green Belt development sites. Noting that Gosden Hill, while having been ploughed in recent times is the second hill and adjacent hill to where the Simian Pot was found in 1892 implying potential archaeological remains could exist on this site.

This is a short coming in the Plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

### Comment ID: pslp171/2235  Respondent: 8581505 / Burpham Neighbourhood Forum (Jim Allen)  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy D3

<table>
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<tbody>
<tr>
<td>4.5.42 Historical Environment: fine.</td>
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</tbody>
</table>

**4.5.42a**

Neighbourhood Plans invariably provide a good reference of historical design standards and should be used.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

### Comment ID: PSLPP16/12172  Respondent: 8582017 / The Clandon Society (J Wright)  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

<table>
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I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.
The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<tr>
<th>Comment ID: PSLPP16/12181</th>
<th>Respondent: 8582017 / The Clandon Society (J Wright)</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
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I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

**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: PSLPP16/13501</th>
<th>Respondent: 8582977 / Guildford Environment Forum (John Bannister)</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
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**POLICY D3**

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<tr>
<th>Comment ID: PSLPP16/13520</th>
<th>Respondent: 8582977 / Guildford Environment Forum (John Bannister)</th>
<th>Agent:</th>
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**POLICY D3**
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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: PSLPP16/15529  Respondent: 8585601 / Jennie Kyte  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy D3: Historic environment

Para. 4.5.38: The sentence in this paragraph: “We will seek to ensure that there is an imaginative approach to ensuring that heritage assets are kept in use and do not fall into disrepair.” is so important that it should be included in Policy D3 policy box. It would be considerably strengthened if the words “seek to” were deleted.

Para. 4/5/42, bullet point 4: I fully support the sentence: “identify heritage assets that make an important contribution to the local character of the area and update our local list on a regular basis.” In any supporting document, Guildford’s Victorian heritage should be protected. Bright Hill close to the town centre is proposed to be developed with housing. Over-looking the site is a magnificent example of a Victorian school. It is a landmark building and locally listed. Also within the site is a locally listed public house. These two buildings should be preserved and the development sensitively designed with regard to these buildings. The views from the site over an AONB, as well as to Guildford Cathedral, should be protected for those walkers and drivers descending Bright Hill.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/2461  Respondent: 8585601 / Jennie Kyte  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY D3: Historic environment

4.5.42 The addition of the words: “Historic landscapes are also undesignated heritage assets and their local distinctiveness can be considered through the Guildford and Surrey Landscape Character Assessments.” is welcomed.

I support the above

4.5.42a The added paragraph is welcomed.
4.5.43 The addition of the word ‘must’ is welcomed.

I support the two paragraphs above.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15877  Respondent: 8586369 / Mr Luigi Fort  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3).

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13960  Respondent: 8591169 / Michael Bruton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11211  Respondent: 8602337 / Cross Group (Mr Colin Cross)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy D3 - Historic Environment
I object to GBC not respecting the historic environment of the rural villages when considering inappropriate large developments. These areas need protecting, not destroying due to the effects of increased traffic, parking problems and wholly inappropriate development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/3240</th>
<th>Respondent: 8605889 / Surrey County Council (Sue Janota)</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy D3</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>Paragraph 4.5.42a should add (for accuracy) &quot;and Potential.&quot;at the end (&quot;The County Archaeologist will be consulted on all planning applications on sites of archaeological importance and potential.&quot;) This is an important additional point, as the two areas are distinct (see below) are highlighted differently in the NPPF, and can prompt entirely different management and investigative techniques during development. Appendix H (Maps) We are about to supply GBC with an entirely new series of Areas of High Archaeological Potential and County Sites of Archaeological Importance maps. They will need to ensure that their final plan contains the correct 2017 dataset before its publication. The Listed Buildings' discussion in the table on page 290 refers to PPG15. This document was rescinded in 2012 - they might wish to bring this reference up-to-date. What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td>Attached documents:</td>
<td></td>
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</tbody>
</table>

<table>
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<tr>
<th>Comment ID: PSLPP16/8653</th>
<th>Respondent: 8608225 / Valerie Jenner</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</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>Ripley and Send together only have about 3000 households and the development would damage the historic environment as a result of the scale of the proposed development (Policy D3).</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: PSLPP16/1266</th>
<th>Respondent: 8608865 / WBDRA. (David Bird)</th>
<th>Agent:</th>
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<tbody>
<tr>
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<td></td>
</tr>
<tr>
<td>WBDRA SUPPORTS this policy and suggests the inclusion of a list of listed building</td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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</tr>
</tbody>
</table>
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: PSLPP16/2393</th>
<th>Respondent: 8609217 / West Clandon Parish Council (John Stone)</th>
<th>Agent:</th>
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POLICY D3 - Historic environment

We object to this policy as it is very weak and we do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which we fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<th>Comment ID: PSLPP16/9856</th>
<th>Respondent: 8627393 / Worplesdon Parish Council (Gaynor White)</th>
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D3 Historic Environment

Support. Subject to the inclusion of locally listed buildings.

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: PSLPP16/10093</th>
<th>Respondent: 8640353 / Julian Cranwell</th>
<th>Agent:</th>
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We object to policy D3 Historic Environment. This policy clashes with the strongly pro-development agenda of the rest of the plan and fails to address the contradiction. History is unamenable to improvement, so the policy should commit the Council firmly to protecting and preserving our heritage assets from development. Instead, the specific policy pledge to “support development” that might “enhance” heritage assets leaves wide scope for abuse in the form of destructive commercialisation and financial leveraging of relevant sites. This policy is based on the false premise that Guildford’s heritage is inherently in decay. This is a developer’s charter – a short step away from the idea that the historic environment needs to pay its way to be preserved. The Council’s aggressive reviews of Guildford Museum and the Electric Theatre support this interpretation. Whatever the “reasoned justification”, the actual policy wording in the blue box leaves too many loopholes. Development close to historical assets is harmful and should be expressly prohibited.
This policy fails to meet the requirements of NPPF paragraphs 126 and 131-133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/5240  Respondent: 8655233 / Kay Mackay  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY D3

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5247  Respondent: 8655233 / Kay Mackay  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY D3

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5045  Respondent: 8667713 / Victoria Sinnett  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
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: PSLPP16/5052  Respondent: 8667713 / Victoria Sinnett  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

15. POLICY D3

I OBJECT to Policy D3 Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2322  Respondent: 8671969 / Valerie Thompson  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

D3 Historic environment

How on earth can development enhance our heritage assets? Not NPPF paras 126 and 131-133.

Development adjacent to historic buildings or landscape damages those assets and should be prohibited.

I object to any suggestion that our heritage can be improved by development.

History is what it is..history, and historic buildings only need looking after, preventing decay, and GBC should support those who care for such properties and landscape.

Subtle improvements to access to the Museum and its links with the Castle do not need aggressive developments.

The Electric Theatre should remain a community asset, and rents based on what local, amateur groups, for whom it was created, can reasonably pay. GBC should never have considered selling it off. They should have spent some of the
money wasted on useless sculptures around the Borough on improving these facilities, making the car-park more efficient and opening up the riverside to the general public.

GBC should not have spent a small fortune on improving their own offices at the expense of facilities for the public.

GBC should not have overspent on buying an office building at a price well beyond that agreed by the Council.

GBC have wasted our rates on pointless vanity projects.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/1085  **Respondent:** 8687265 / Dagero Ltd (David Roberts)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**POLICY D3 - Historic environment**

I OBJECT. This policy clashes with the strongly pro-development agenda of the rest of the plan and fails to address the contradiction. History is unamenable to improvement, so the policy should commit the Council firmly to protecting and preserving our heritage assets from development. Instead, the specific policy pledge to “support development” that might “enhance” heritage assets leaves wide scope for abuse in the form of destructive commercialisation and financial leveraging of relevant sites.

This policy is based on the false premise that Guildford’s heritage is inherently in decay. This is a developer’s charter – a short step away from the idea that the historic environment needs to pay its way to be preserved. The Council’s aggressive reviews of Guildford Museum and the Electric Theatre support this interpretation. Whatever the “reasoned justification”, the actual policy wording in the blue box leaves too many loopholes.

Development close to historical assets is harmful and should be expressly prohibited. This policy fails to meet the requirements of NPPF paragraphs 126 and 131-133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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**Comment ID:** PSLPP16/2637  **Respondent:** 8693153 / Vicki Willetts  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY D3 (HISTORIC ENVIRONMENT): • Supports overdevelopment: you can’t “enhance” history. Doesn’t ban private interests from trying to make aggressive profits from privatising, commercialising and Disneyfying public historic assets. • Doesn’t ban development near historic assets. • Ignores NPPF 126, 131, 132, 133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPP16/8889  **Respondent:** 8694369 / Nicola Ogilvie Smals  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The NPPF and draft local plan emphasises the need to consider the historic environment. Site 38 contains a grade II listed farmhouse and West Horsley Village contains a number of listed buildings. The incorporation of so many houses within the curtilage of listed buildings does not comply with D3

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/15021  **Respondent:** 8708545 / Nigel Wicks  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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:** PSLPP16/4501  **Respondent:** 8709249 / Geoff Spink  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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Attached documents:
### Comment ID: PSLPP16/4508  Respondent: 8709249 / Geoff Spink  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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**Attached documents:**

### Comment ID: PSLPP16/4736  Respondent: 8711841 / Rosmarie Roberts-Kunz  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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**Attached documents:**

### Comment ID: PSLPP16/17064  Respondent: 8717921 / Helen Jefferies  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

**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. |
| • I object to the disproportionate size of sites relative to the historic rural villages they will |
| **What changes (2016)/further amendments (2017) do you suggest should be made to the document?** |

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<td>• I object to the lack of consideration for the protection of heritage. There appears to be no concept of understanding that the number of HGVs used during major construction either of infrastructure or housing has a huge negative impact on listed buildings due to shaking foundations for example, increase in pollution [and impact on brickwork/mortar etc].</td>
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<th>Comment ID: PSLPP16/3229</th>
<th>Respondent: 8726529 / Eric Palmer</th>
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Document page number 1696
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3236  Respondent: 8726529 / Eric Palmer  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
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1. POLICY D3

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3501  Respondent: 8726529 / Eric Palmer  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Object

Wording is woolly and ineffective. It needs to be stronger, and much more prominent.

I would add that any development close to historical assets is harmful and should be expressly prohibited. This policy fails to meet the requirements of NPPF paragraphs 126 and 131-133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Object

The policy is weak and fails to get to the core issue of protecting our history and heritage against over development. The policy should protect and preserve our heritage assets and new development be sympathetic with it.

Wording need to be stronger, and much more prominent.

We would add that any development close to historical assets is harmful and should be expressly prohibited. This policy fails to meet the requirements of NPPF paragraphs 126 and 131-133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I support the addition in paragraph 4.5.42, which recognises that “Historic landscapes are also undesignated heritage assets”. However, merely “considering” their local distinctive “through the Guildford and Surrey Landscape Character Assessments” is not enough. GBC’s Landscape Character Assessment (LCA) considers that the landscape of the Hog’s Back a key asset, which should be conserved.

Its landscape strategy states:

“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.” (Page 41 - emphasis mine.)
This strategy has been disregarded in the Blackwell Farm site allocation (policy A26), which proposes to build over this open landscape and damage views from the ridge line. This policy should be strengthened to ensure that recommendations in the LCA are adopted.

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)

Comment ID: PSLPP16/6703  Respondent: 8731649 / Ian Slater  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
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: PSLPP16/6710  Respondent: 8731649 / Ian Slater  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13925  Respondent: 8732993 / Michael Weber  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
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:** PSLPP16/13935  **Respondent:** 8732993 / Michael Weber  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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:** PSLPP16/15804  **Respondent:** 8732993 / Michael Weber  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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**Comment ID:** PSLPP16/15826  **Respondent:** 8732993 / Michael Weber  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
**Comment ID:** PSLPP16/3193  **Respondent:** 8733857 / Tony Edwards  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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**Comment ID:** PSLPP16/12939  **Respondent:** 8735873 / David and Gillian Allan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

Continued…………………………………2/

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/12965  **Respondent:** 8735873 / David and Gillian Allan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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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: PSLPP16/5111  Respondent: 8741377 / Lisanne Mealing  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3917  Respondent: 8744161 / Michael Bridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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: PSLPP16/3939  Respondent: 8744257 / Mary E Bridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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Attached documents:

Comment ID: PSLPP16/9297  Respondent: 8744417 / Mark & Gillie Hammersley  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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Comment ID: PSLPP16/9340  Respondent: 8744417 / Mark & Gillie Hammersley  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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Attached documents:

Comment ID: PSLPP16/12308  Respondent: 8749473 / Charlotte Beckett  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
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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:** PSLPP16/12546  **Respondent:** 8769793 / Laura Richards  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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**Comment ID:** PSLPP16/5069  **Respondent:** 8770177 / Phil Attwood  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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**Attached documents:**
Comment ID: PSLPP16/4891  Respondent: 8771233 / Ranald Mackinnon  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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Comment ID: PSLPP16/4898  Respondent: 8771233 / Ranald Mackinnon  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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Attached documents:

Comment ID: PSLPP16/5586  Respondent: 8771265 / H C MacKinnon  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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**Comment ID:** PSLPP16/2980  
**Respondent:** 8796673 / Suzanne Burroughs  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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**Comment ID:** PSLPP16/7565  
**Respondent:** 8798849 / David Williams  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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**Comment ID:** PSLPP16/7589  
**Respondent:** 8798849 / David Williams  
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Attached documents:

Comment ID: PSLPP16/2735  Respondent: 8798881 / H L Cousins  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
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Comment ID: PSLPP16/12748  Respondent: 8800545 / Bill Taylor  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
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Attached documents:

Comment ID: PSLPP16/4102  Respondent: 8805249 / Peter Warburton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5275  Respondent: 8810113 / Louise Stewart  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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Comment ID: PSLPP16/5282  Respondent: 8810113 / Louise Stewart  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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Comment ID: PSLPP16/16541  Respondent: 8810849 / Charles Lee  Agent:
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Comment ID: PSLPP16/16648  Respondent: 8810849 / Charles Lee  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
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Attached documents:

Comment ID: PSLPP16/9296  Respondent: 8812097 / Clare Benzikie  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
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Comment ID: PSLPP16/9339  Respondent: 8812097 / Clare Benzikie  Agent:
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Comment ID: PSLPP16/2752  Respondent: 8813601 / Gaenor Richards  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
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Comment ID: PSLPP16/6130  Respondent: 8817953 / Sheena Ewen  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
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<th>Comment ID: PSLPP16/16449</th>
<th>Respondent: 8818625 / Beth and Frank Fuller</th>
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<td>8826081 / Simon Wilcockson</td>
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Attached documents:

Comment ID: PSLPP16/13398  Respondent: 8826369 / Tim Madge  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6101  Respondent: 8826913 / Gemma Harrison  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4571  Respondent: 8827777 / Mary English  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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Comment ID: PSLPP16/4578  Respondent: 8827777 / Mary English  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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Comment ID: PSLPP16/2992  Respondent: 8827809 / Robert Wood  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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Comment ID: PSLPP16/3011  Respondent: 8827809 / Robert Wood  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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<th>Comment ID: PSLPP16/11100</th>
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<th>Comment ID: PSLPP16/17406</th>
<th>Respondent: 8834689 / of NLP Ltd c/o Solum Regeneration (Dennis Pope)</th>
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As currently expressed, we do not consider Policy D3 to be consistent with the NPPF (paras 126 - 134) as the distinction between development that leads to “substantial” harm of a heritage asset as opposed to “less than substantial harm” is not made clear.

Paragraph 2 of draft Policy D3 states that works which would cause harm to the significance of a heritage asset, whether designated or non-designated, or its setting, will not be permitted without a clear justification to show that the public benefits of the proposal considerably outweigh any harm to the significance or special interest of the heritage asset in question.

Where there is “substantial” harm to a heritage asset the NPPF makes clear that the relevant test is whether the substantial harm is necessary to achieve substantial public benefits that outweigh the harm. However, where there is "less than substantial harm" the NPPF advises that the decision-maker should weigh the harm against the public benefits of the proposal.

We would suggest therefore that this distinction should be reflected in Policy D3 so that the second paragraph reads:

"Heritage assets are an irreplaceable resource and works which would cause substantial harm to the significance of a heritage asset, whether designated or non-designated, or its setting, will not be permitted without a clear justification to demonstrate that substantial harm is necessary to achieve substantial public benefits that outweigh the harm. Where the harm is assessed to be less than substantial this harm will need to be weighed against the public benefits of the proposal."

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8301  Respondent: 8835425 / Martin O'Hara  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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HISTORIC ENVIRONMENT

I, like many others, have been proud to have played an active part of the local community of West Horsley. Our village is proud of its 41 listed buildings, including the 11th century St. Mary’s Church and West Horsley Place, and it is therefore essential that we careful consider what will be appropriate for the well-being of the village, and these listed buildings, whilst planning the next phase of its history and development.

As you will be aware, both West Horsley, and neighbouring East Horsley, benefits from a number of historic individual buildings of quality and character, in particular the use of brick and flint. Any new housing proposed, in any location within the village, be it a larger proposed site or a small, single dwelling redevelopment, should therefore be of high quality design and materials, sensitively woven into the existing grain of the village. Permitting the bland ‘one style fits all’ of the volume house builders would be an unacceptable travesty.

I therefore SUPPORT Policy D3: Historic environment

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Conserving and enhancing the historic environment may be damaged by supporting ancillary development. In historic locations (Chilworth Gunpowder Mills, the NT sites like Clandon Park or Hatchlands, Guildford Castle, Guildford Museum etc) this policy needs to have an overriding emphasis on protection rather than supporting development.</td>
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Development close to historical assets is harmful and should be expressly prohibited. This policy fails to meet the requirements of NPPF paragraphs 126 and 131-133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13415  Respondent: 8840033 / Jimmy Daboo  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
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Comment ID: PSLPP16/13425  Respondent: 8840033 / Jimmy Daboo  Agent:
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Attached documents:

Comment ID: PSLPP16/5338  Respondent: 8846849 / David Berliand  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3205  Respondent: 8850433 / Ian Doherty  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

East Horsley contains a wide range of heritage assets which make an important contribution to the look and feel of the village and its character. I fully 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: PSLPP16/13331  Respondent: 8850945 / Richard Bayes  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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POLICY D3: Historic environment

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Comment ID: PSLPP16/10599  Respondent: 8855969 / Jonathan Murphy  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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Comment ID: PSLPP16/17789  Respondent: 8858113 / Ramsey Nagaty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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This policy is based on the false premise that Guildford’s heritage is inherently in decay. This is a developer’s charter – a short step away from the idea that the historic environment needs to pay its way to be preserved. The Council’s aggressive reviews of Guildford Museum and the Electric Theatre support this interpretation. Whatever the “reasoned justification”, the actual policy wording in the blue box leaves too many loopholes.

Development close to historical assets is harmful and should be expressly prohibited. This policy fails to meet the requirements of NPPF paragraphs 126 and 131-133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPP16/2434  Respondent: 8858433 / Eric Peters  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy D3 - Historic Environment

I object. This should oppose not support development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPP16/10386  Respondent: 8858881 / Stephen Meredith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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I object to the impact which the proposed local plan will have on special countryside. The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland which includes over 80 ancient oak trees that surrounds and runs through the site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/2231  Respondent: 8860897 / Julia Shaw  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( )

I PART OBJECT, PART SUPPORT this policy

The policy appears reasonable.

However, conserving and enhancing the historic environment may be damaged by supporting ancillary development.

In historic locations (Chilworth Gunpowder Mills, the NT sites like Clandon Park or Hatchlands, Guildford Castle, Guildford Museum etc) this policy needs to have an overriding emphasis on protection rather than supporting development.

The emphasis on supporting some development – in the context of an authority that has already set in place aggressive reviews of Guildford Museum and the Electric Theatre – should be viewed with some caution.

The reasoned justification seems reasonable but it must be noted that it is the wording of the policy, rather than the associated explanation, that must be key.

This policy clashes with the strongly pro-development agenda of the rest of the plan and fails to address the contradiction. History is unamenable to improvement, so the policy should commit the Council firmly to protecting and preserving our heritage assets from development. Instead, the specific policy pledge to “support development” that might “enhance” heritage assets leaves ample scope for abuse in the form of destructive commercialisation and financial leveraging.

This policy is based on the false premise that Guildford’s heritage is inherently in decay. This is a developer’s charter – a short step away from the idea that the historic environment needs to pay its way to be preserved. The Council’s aggressive reviews of Guildford Museum and the Electric Theatre support this interpretation. Whatever the “reasoned justification”, the actual policy wording in the blue box leaves too many loopholes.

Development close to historical assets is harmful and should be expressly prohibited. This policy fails to meet the requirements of NPPF paragraphs 126 and 131-133.

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<th>Respondent: 8865537 / P Waldner</th>
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Attached documents:

Comment ID: PSLPP16/7641  Respondent: 8875457 / Mark Ground  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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Attached documents:

Comment ID: PSLPP16/3997  Respondent: 8880353 / Judith Allen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

5) I object to the threat that the Local Plan poses to the historic village of Ockham and the blight on its properties. The Plan calls for a village of 159 residences (with narrow lanes, no street lights, very few pavements and many listed houses) to be subsumed into a 2000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London Boroughs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7159  Respondent: 8881345 / Lynne Ground  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
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1.1 We object to policy D3 Historic Environment

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<th>Comment ID: PSLPP16/12143</th>
<th>Respondent: 8896097 / Andrew Fordham</th>
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<th>Respondent: 8899617 / Claire Nix</th>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8036  Respondent: 8899713 / Tessa Crago  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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Comment ID: PSLPP16/8043  Respondent: 8899713 / Tessa Crago  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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Comment ID: PSLPP16/4254  Respondent: 8900705 / Susan Fuller  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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<th>Comment ID</th>
<th>Respondent: 8901825 / Raymond Woolfson</th>
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7. I object to the threat to listed buildings in contradiction of NPPF sections 17, 65, 126,128 & 129 etc

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8164  Respondent: 8902465 / Linda Slater  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY D3 (HISTORIC ENVIRONMENT):

- Supports overdevelopment: you can’t “enhance” history. Doesn’t ban private interests from trying to make aggressive profits from privatising, commercialising and Disneyfying public historic assets.
- Doesn’t ban development near historic assets.
- Ignores NPPF 126, 131, 132, 133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/18525  Respondent: 8903265 / Susan Anderson  Agent:

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Comment ID: PSLPP16/15033  Respondent: 8904129 / Elizabeth Ross  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15050  Respondent: 8904129 / Elizabeth Ross  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1458  Respondent: 8904161 / Geoffrey & Lesley Tregaskes  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to Ockham, an historic village made up of very few houses, many of them listed and grouped in small hamlets in one of the first areas of real countryside to the southwest of London, being subsumed into a 2,000+ dwelling development, with building up to five storeys high and a population density higher than most London boroughs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/4189  **Respondent:** 8904673 / Colin Burnside  **Agent:**
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. **POLICY D3**

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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:** PSLPP16/4198  **Respondent:** 8904673 / Colin Burnside  **Agent:**
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. **POLICY D3**

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/15075  **Respondent:** 8905537 / Christopher Ross  **Agent:**
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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: PSLPP16/15082</th>
<th>Respondent: 8905537 / Christopher Ross</th>
<th>Agent:</th>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</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: PSLPP16/9642  Respondent: 8906305 / Anne Fort  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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: PSLPP16/18426  Respondent: 8909761 / Diana Grover  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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: PSLPP16/18442  Respondent: 8909761 / Diana Grover  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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: PSLPP16/12078  Respondent: 8914945 / Nichola Armstrong  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to D3 because there is no importance attached to the historic conservation or preservation of the Town Centre or conservation areas within the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13221  Respondent: 8919009 / Andrew Kukielka  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY D3

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13250  Respondent: 8919009 / Andrew Kukielka  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
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: PSLPP16/11985  Respondent: 8921377 / Paul Maycox  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
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: PSLPP16/11994  Respondent: 8921377 / Paul Maycox  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy D3 - Historic environment

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13010  Respondent: 8921569 / Steven Cliff  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
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 will have a negative impact on the countryside in our borough.

The ancient woodland that surrounds the site of the proposed development at Garlick’s Arch (A43) will be permanently impacted, including over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

1. POLICY D3

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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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<tr>
<th>Comment ID: PSLPP16/5787</th>
<th>Respondent: 8924577 / Charles Lee</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
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<th>Comment ID: PSLPP16/1209</th>
<th>Respondent: 8925153 / D B Saidman</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
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<th>Comment ID: PSLPP16/15156</th>
<th>Respondent: 8926529 / Annie Cross</th>
<th>Agent:</th>
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Section page number 65 of 266
Policy D3 - Historic Environment

I object to GBC not respecting the historic environment of the rural villages when considering inappropriate large developments. These areas need protecting, not destroying due to the effects of increased traffic, parking problems, etc.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11710  Respondent: 8928033 / P. Richardson  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3 
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

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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: PSLPP16/11934  Respondent: 8928289 / Trevor Skerritt  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3 
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: PSLPP16/73  Respondent: 8929057 / East Horsley Parish Council (Nick Clemens)  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3 
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY D3: Historic environment
East Horsley contains a wide range of heritage assets which make an important contribution to the look and feel of the village and its character. We fully support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4457  Respondent: 8930209 / Ray Corstin  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY D3

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4464  Respondent: 8930209 / Ray Corstin  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY D3

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15914  Respondent: 8930625 / Malcolm Scott  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the threat to the historic rural village of Ockham and the blight on properties there. The plan calls for this village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8785  Respondent: 8933185 / Peter See  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

4.5.42 Policy D3: Historic Environment

its: their

program : programme

Note: see 4.6.19 for consistency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/819  Respondent: 8933537 / Annie Ladd  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy D3
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: PSLPP16/2964  Respondent: 8933889 / Nicholas Travers  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

3) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 164 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17119  Respondent: 8940225 / Glen Ruddy  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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: PSLPP16/16056  Respondent: 8941761 / FLGCA (Paul Kassell)  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

8.3 D3 Historic Environment FLAG agrees with this policy

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17214  Respondent: 8944929 / A Jefferies  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the disproportionate size of sites relative to the historic rural villages they will ruin.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17229  Respondent: 8944929 / A Jefferies  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the lack of consideration for the protection of heritage assets. There appears to be no recognition that the number of HGVs used during major construction either of infrastructure or housing has a huge negative impact on listed buildings due to shaking foundations and increase in pollution [and impact on brickwork/mortar etc].

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16170  Respondent: 8948385 / Gillian Eve  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to this policy in its current form. Whilst it is important to protect the historic assets of the borough, the wording is too imprecise and will leave Guildford’s valuable historic sites at risk of inappropriate development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11968  Respondent: 8979265 / Rachel Taylor  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8682  Respondent: 9050337 / Nigel Geary  Agent:
East Horsley contains a wide range of heritage assets which make an important contribution to the look and feel of the village and its character. I fully support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11471  Respondent: 9062913 / Susan Parker  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY D3 Historic environment

PART SUPPORT, PART OBJECT The policy appears reasonable. However, conserving and enhancing the historic environment may be damaged by supporting ancillary development. In historic locations (Chilworth Gunpowder Mills, the NT sites like Clandon Park or Hatchlands, Guildford Castle, Guildford Museum etc) this policy needs to have an overriding emphasis on protection rather than supporting development. The emphasis on supporting some development – in the context of an authority that has already set in place aggressive reviews of Guildford Museum and the Electric Theatre – should be viewed with some caution. The reasoned justification seems reasonable but it must be noted that it is the wording of the policy, rather than the associated explanation, that must be key.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7024  Respondent: 9094753 / D Jones  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7061  Respondent: 9094753 / D Jones  Agent:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/4481</th>
<th>Respondent: 9298465 / Peter Grover</th>
<th>Agent:</th>
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<tr>
<td>Comment ID: PSLPP16/14960</td>
<td>Respondent: 9327009 / sp2 Consulting Limited (Stephen Parker)</td>
<td>Agent:</td>
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<th>Comment ID: PSLPP16/5876</th>
<th>Respondent: 9412065 / Stephen Bray</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
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<tr>
<td>D3 - Historic environment and heritage: West Horsley benefits from a wealth of history and heritage as I discuss in the following sections of this consultation response. That there is a proposed policy to recognise this has my wholehearted support, but the proposed development of West Horsley should specifically take the opportunity to reclaim and embrace its past.</td>
<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: PSLPP16/6337</th>
<th>Respondent: 9607905 / Anne Pascoe</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
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</table>
Comment ID: PSLPP16/6436  Respondent: 9607905 / Anne Pascoe  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10525  Respondent: 10299041 / F McHugh  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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: PSLPP16/10563  Respondent: 10299041 / F McHugh  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2296  Respondent: 10423265 / Jillian Tallick  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

8. I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

The Garlick’s Arch (A43) proposal would double the built area in the locality, and would irrevocably damage the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICY D3 - Historic environment

I OBJECT. This policy clashes with the strongly pro-development agenda of the rest of the plan and fails to address the contradiction. History is unamenable to improvement, so the policy should commit the Council firmly to protecting and preserving our heritage assets from development. Instead, the specific policy pledge to “support development” that might “enhance” heritage assets leaves ample scope for abuse in the form of destructive commercialisation and financial leveraging.

This policy is based on the false premise that Guildford’s heritage is inherently in decay. This is a developer’s charter – a short step away from the idea that the historic environment needs to pay its way to be preserved. The Council’s aggressive reviews of Guildford Museum and the Electric Theatre support this interpretation. Whatever the “reasoned justification”, the actual policy wording in the blue box leaves too many loopholes.

Development close to historical assets is harmful and should be expressly prohibited. This policy fails to meet the requirements of NPPF paragraphs 126 and 131-133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/13445</th>
<th><strong>Respondent:</strong> 10701537 / Ben Gamble</th>
<th><strong>Agent:</strong></th>
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1. I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I object to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development a Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

**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: PSLPP16/3845</th>
<th><strong>Respondent:</strong> 10702561 / Emily Gamble</th>
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7. I object to the damage to the historic environment as a result of the scale of the proposed development

It is a violation to permanently destroy the Ancient Woodland that surrounds the Garlick’s Arch site on two sides and includes over 80 ancient oak trees.

**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: PSLPP16/17912</th>
<th><strong>Respondent:</strong> 10722049 / Richard Smith</th>
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1. I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

It appears that the historic nature of Guildford Town itself has somehow taken precedence over the historic nature of the villages, hamlets and wooded areas that surround it. I object most strongly to this. If the residents of Guildford Town really want to attract new business into the Town and wish to grow the Town into a larger urban area then that expansion must be concentrated on the Town itself and not shoved out to the Green Belt and imposed on those that live there.
In particular, Ripley is an historic village and a conservation area. Removing this village from the Green Belt will remove that protection and leave it open to further ad hoc development. Likewise, the proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11718  Respondent: 10723553 / Judith Pound  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3). Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2105  Respondent: 10730721 / The Milestone Society (Colin Woodward)  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Guildford Local Plan: Strategy and Sites

Thank you for your letter dated 2nd June 2016.

This Society wrote to you back in August 2014 about the Draft Guildford Plan Consultation. For convenience I attach a copy of this letter.

We are pleased to note that your policy D3 and justifications support conservation of both designated and non-designated historic assets.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14786  Respondent: 10735777 / S. May  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6938  Respondent: 10756449 / Richard and Valerie Overton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

The Garlick’s Arch (A43) proposal would double the built area in the locality, and would irrevocably damage the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4985  Respondent: 10758593 / Richard & Delia Baker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12215  Respondent: 10765249 / Andy & Sonja Freebody  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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Attached documents:

Comment ID: PSLPP16/12255  Respondent: 10765249 / Andy & Sonja Freebody  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12594  Respondent: 10769121 / Ali Elson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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Attached documents:

Comment ID: PSLPP16/12608  Respondent: 10769121 / Ali Elson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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Section page number  Page 80 of 266  Document page number 1757
1. POLICY D3

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Attached documents:

Comment ID: PSLPP16/13601  Respondent: 10773441 / Barry Marshall  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
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Comment ID: PSLPP16/13614  Respondent: 10773441 / Barry Marshall  Agent:
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Attached documents:

Comment ID: PSLPP16/11546  Respondent: 10774145 / P Jordan  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11562  Respondent: 10774145 / P Jordan  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12433  Respondent: 10778849 / Jonathan Cooper  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the damage to the historical character of these areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10193  Respondent: 10780929 / Naren Nanda  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
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Attached documents:

Comment ID: PSLPP16/13709  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 D3 (HISTORIC ENVIRONMENT):

• Supports overdevelopment: you can’t “enhance” history. Doesn’t ban private interests from trying to make aggressive profits from privatising, commercialising and Disneyfying public historic assets.
• Doesn’t ban development near historic assets.
• Ignores NPPF 126, 131, 132, 133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15307  Respondent: 10782689 / Murray Dudgeon  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:

Comment ID: PSLPP16/9127  Respondent: 10785633 / Penelope Eagle  Agent:

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Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15034  Respondent: 10796417 / Richard Shenton  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15051  Respondent: 10796417 / Richard Shenton  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID: PSLPP16/842  Respondent: 10798049 / Steve & Maureen Knight  Agent:**

**Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Support and also include all local listed buildings

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID: PSLPP16/343  Respondent: 10799169 / Neal Basson  Agent:**

**Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**POLICY D3 Historic environment**

PART SUPPORT, PART OBJECT The policy appears reasonable. However, conserving and enhancing the historic environment may be damaged by supporting ancillary development. In historic locations (Chilworth Gunpowder Mills, the NT sites like Clandon Park or Hatchlands, Guildford Castle, Guildford Museum, etc.) this policy needs to have an overriding emphasis on protection rather than supporting development. The emphasis on supporting some development – in the context of an authority that has already set in place aggressive reviews of Guildford Museum and the Electric Theatre – should be viewed with some caution. The reasoned justification seems reasonable but it must be noted that it is the wording of the policy, rather than the associated explanation, that must be key.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID: PSLPP16/1839  Respondent: 10799169 / Neal Basson  Agent:**

**Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

PART SUPPORT, PART OBJECT The policy appears reasonable. However, conserving and enhancing the historic environment may be damaged by supporting ancillary development. In historic locations (Chilworth Gunpowder Mills,
the NT sites like Clandon Park or Hatchlands, Guildford Castle, Guildford Museum, etc.) this policy needs to have an
overriding emphasis on protection rather than supporting development. The emphasis on supporting some development –
in the context of an authority that has already set in place aggressive reviews of Guildford Museum and the Electric
Theatre – should be viewed with some caution. The reasoned justification seems reasonable but it must be noted that it is
the wording of the policy, rather than the associated explanation, that must be key.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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The policy appears reasonable. However, conserving and enhancing the historic environment may be damaged by supporting ancillary development. In historic locations (Chilworth Gunpowder Mills, the NT sites like Clandon Park or Hatchlands, Guildford Castle, Guildford Museum, etc.) this policy needs to have an overriding emphasis on protection rather than supporting development. The emphasis on supporting some development – in the context of an authority that has already set in place aggressive reviews of Guildford Museum and the Electric Theatre – should be viewed with some caution. The reasoned justification seems reasonable but it must be noted that it is the wording of the policy, rather than the associated explanation, that must be key.

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 damage to the historic environment as a result of the scale of the proposed development (Policy D3)

The Garlick’s Arch (A43) proposed development would double the built up area in the locality, and would irrevocably damage the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees. This is totally unacceptable and again shows the Council’s complete disregard for local opinion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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The Garlick’s Arch (A43) proposed development would double the built up area in the locality, and would irrevocably damage the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees. This is totally unacceptable and again shows the Council’s complete disregard for local opinion and will wilfully fail to meet its responsibility to protect our environment and standard of living.

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 damage to the historic environment as a result of the scale of the proposed development (Policy D3)

Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11050  Respondent: 10809377 / Bernice Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY D3

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick's Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

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 and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, 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.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.
The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough's infrastructure is already heavily strained. However the plan's determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen. Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy 11. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy 11 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

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. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11061  Respondent: 10809377 / Bernice Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
1. POLICY D3

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will "enhance" heritage assets which I fear is a developer's charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11894  Respondent: 10811361 / Simon Crago  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I object to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the old and established woodland that surrounds the site on two sides and runs centrally through the site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12364  Respondent: 10811681 / Linda Knight  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

8. I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1657  Respondent: 10816705 / Maggie Cole  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
8. I object to the damage to the historic environment as a result of the scale of the proposed development

The Garlick’s Arch proposal would double the built-up area in the locality, and would irrevocably damage the trees on the site, which includes over 80 ancient Oaks. Once these historic environments are destroyed they cannot be replaced and should be protected for future generations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12213  Respondent: 10816993 / Jane Roberts  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12253  Respondent: 10816993 / Jane Roberts  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13944  Respondent: 10822913 / Karen Dougherty  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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:
I object to the local plan based on the impact it will have on the special countryside of the borough.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6649  Respondent: 10829121 / Julie Brown  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to POLICY D3 - Historic environment

- Supports overdevelopment: you can’t “enhance” history. Doesn’t ban private interests from trying to make aggressive profits from privatising and commercialising public historic assets.
- Doesn’t ban development near historic assets.
- Development close to historical assets is harmful and should be expressly prohibited. Fails to meet the requirements of NPPF 126, 131, 132, 133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3890  Respondent: 10833537 / AC Vause  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5823  Respondent: 10836033 / Katherine Gervasio  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
1. **I object to the damage to the historic environment as a result of the scale of the proposed development**

Garlick’s Arch (A43) is proposed to have development that would double the built up area in this locality and include business units which are more than likely to attract heavy goods vehicles and this would inevitably damage the character of the Ancient Woodland which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16677  Respondent: 10836033 / Katherine Gervasio  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)**

Garlick’s Arch (A43) is proposed to have development that would double the built up area in this locality and include business units which are more than likely to attract heavy goods vehicles and this would inevitably damage the character of the Ancient Woodland which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3484  Respondent: 10843361 / Natalie Brown  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**I object to POLICY D3 - Historic environment**

- Supports overdevelopment: you can’t “enhance” history. Doesn’t ban private interests from trying to make aggressive profits from privatising and commercialising public historic assets.
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14459  Respondent: 10846625 / Frank Drennan  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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 D3 “Historic Environment” on the grounds that;

1.2 This policy clashes with the strongly pro-development agenda of the rest of the plan and fails to address the contradiction. History is unamenable to improvement, so the policy should commit the Council firmly to protecting and preserving our heritage assets from development. Instead, the specific policy pledge to “support development” that might “enhance” heritage assets leaves wide scope for abuse in the form of destructive commercialisation and financial leveraging of relevant sites.

1.3 This policy is based on the false premise that Guildford’s heritage is inherently in decay. This is a developer’s charter – a short step away from the idea that the historic environment needs to pay its way to be preserved. The Council’s aggressive reviews of Guildford Museum and the Electric Theatre support this interpretation. Whatever the “reasoned justification”, the actual policy wording in the blue box leaves too many loopholes.

1.4 Development close to historical assets is harmful and should be expressly prohibited. This policy fails to meet the requirements of NPPF paragraphs 126 and 131-133.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/1775  **Respondent:** 10848513 / Martin Cole  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

8. I object to the damage to the historic environment as a result of the scale of the proposed development

The Garlick’s Arch proposal would double the built-up area in the locality, and would irrevocably damage the trees on the site, which includes over 80 ancient Oaks. Once these historic environments are destroyed they cannot be replaced and should 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:** PSLPP16/7176  **Respondent:** 10854113 / Sarah Pickering  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

WE OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

WE OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
WE OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development, which will “enhance” heritage assets, which I fear, is a developer’s charter as it leaves plenty of room for abuse

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

8. I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

The Garlick’s Arch (A43) proposal would double the built area in the locality, and would irrevocably damage the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

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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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<th>Comment ID: PSLPP16/8855</th>
<th>Respondent: 10857889 / William Kyte OBE</th>
<th>Agent:</th>
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</table>

I PART OBJECT, PART SUPPORT this policy

The policy appears reasonable.

However, conserving and enhancing the historic environment may be damaged by supporting ancillary development.

In historic locations this policy needs to have an overriding emphasis on protection rather than supporting development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/18607</th>
<th>Respondent: 10858977 / Angela Otterson</th>
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</table>

I object to policy D3 Historic Environment

This policy clashes with the strongly pro-development agenda of the rest of the plan and fails to address the contradiction. History is unamenable to improvement, so the policy should commit the Council firmly to protecting and preserving our heritage assets from development. Instead, the specific policy pledge to “support development” that might “enhance” heritage assets leaves wide scope for abuse in the form of destructive commercialisation and financial leveraging of relevant sites.

This policy is based on the false premise that Guildford’s heritage is inherently in decay. This is a developer’s charter – a short step away from the idea that the historic environment needs to pay its way to be preserved. The Council’s aggressive reviews of Guildford Museum and the Electric Theatre support this interpretation. Whatever the “reasoned justification”, the actual policy wording in the blue box leaves too many loopholes.

Development close to historical assets is harmful and should be expressly prohibited. This policy fails to meet the requirements of NPPF paragraphs 126 and 131-133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
### POLICY D3 HISTORIC ENVIRONMENT

I object to policy D3 Historic Environment

This policy clashes with the strongly pro-development agenda of the rest of the plan and fails to address the contradiction. History is unamenable to improvement, so the policy should commit the Council firmly to protecting and preserving our heritage assets from development. Instead, the specific policy pledge to “support development” that might “enhance” heritage assets leaves wide scope for abuse in the form of destructive commercialisation and financial leveraging of relevant sites.

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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:

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Comment ID: PSLPP16/10912  Respondent: 10866721 / Andy Court  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

No protection of heritage assets

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7116  Respondent: 10875969 / Valerie Austin  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the threat the Local Plan poses to the historic village of Ockham and to my Hamlet of Hatchford

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16428  Respondent: 10876033 / Lucie Paulson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to policy D3
- enhancing the historic environment is very difficult if you are building modern buildings around it and removing green land which has surrounded it for centuries in some cases.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11013  Respondent: 10878977 / Lisbet Hjort Jensen  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

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 the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

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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 D3**

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**POLICY D3**

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID: PSLPP16/9146  Respondent: 10906145 / Joe Gervasio  Agent:**

**Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3**

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

1. I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

As any view of the area from the air will tell you, the Garlick’s Arch (A43) proposal would double the built area in the locality, and would irrevocably damage the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees.

This area is an attractive area and forms part of one of the Borough’s most valuable assets – open green space. It should not be destroyed because a property developer is prepared to “gift” some land for a slip road.

The council often complains that a significant proportion of the Borough’s Green Belt. But this is a Good Thing! We should be grateful for it, appreciative of it, and protective towards it.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID: PSLPP16/18147  Respondent: 10910273 / Lynda M Williams  Agent:**

**Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3**

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

East Horsley contains a wide range of heritage assets which make an important contribution to the look and feel of the village and its character. We fully support this policy.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
Comment ID: PSLPP16/12153  Respondent: 10910753 / Heather Thompson  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

The Garlick’s Arch (A43) proposal would double the built area in the locality, and would irrevocably damage the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees.  

What changes (2016)/further amendments (2017) do you suggest should be made to the document?  
Attached documents:  

Comment ID: PSLPP16/11120  Respondent: 10911425 / Andrew Gray  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

1. I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)  

The Garlick’s Arch (A43) proposal would double the built area in the locality, and would irrevocably damage the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees.  

What changes (2016)/further amendments (2017) do you suggest should be made to the document?  
Attached documents:  

Comment ID: PSLPP16/16139  Respondent: 10912513 / Sarah Green  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3  
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 that will be caused 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:  

Comment ID: PSLPP16/12070  Respondent: 10922177 / Paul Knight  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
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**8. I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)**

Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/7658</th>
<th>Respondent: 10923265 / Colin Lewis</th>
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I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

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 D3 (HISTORIC ENVIRONMENT):
• Supports overdevelopment: you can’t “enhance” history. Doesn’t ban private interests from trying to make aggressive profits from privatising, commercialising and Disneyfying public historic assets.
• Doesn’t ban development near historic assets.
• Ignores NPPF 126, 131, 132, 133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8997  Respondent: 10928737 / Guy Pashley  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)
I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.
The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9033  Respondent: 10928737 / Guy Pashley  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy D3 - Historic environment
I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15259  Respondent: 10930945 / Peter Perry  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the damage that will be caused to the historic environment as a result of the scale of the proposed development (Policy D3)
The Ancient Woodland on the Garlick's Arch site (A43), including over 80 ancient oak trees, is something a civilized society should treasure but the vast development that is proposed would double the built area in the locality and would irrevocably damage the character of this area for future generations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1721  Respondent: 10933793 / Julia Tilbury  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY D3 - Historic environment

I OBJECT. This policy clashes with the strongly pro-development agenda of the rest of the plan and fails to address the contradiction. History is unamenable to improvement, so the policy should commit the Council firmly to protecting and preserving our heritage assets from development. Instead, the specific policy pledge to "support development" that might "enhance" heritage assets leaves wide scope for abuse in the form of destructive commercialisation and financial leveraging of relevant sites.

This policy is based on the false premise that Guildford's heritage is inherently in decay. This is a developer's charter - a short step away from the idea that the historic environment needs to pay its way to be preserved. The Council's aggressive reviews of Guildford Museum and the Electric Theatre support this interpretation. Whatever the "reasoned justification", the actual policy wording in the blue box leaves too many loopholes.

Development close to historical assets is harmful and should be expressly prohibited. This policy fails to meet the requirements of NPPF paragraphs 126 and 131-133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1693  Respondent: 10933857 / C J Tilbury  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY D3 - Historic environment

I OBJECT. This policy clashes with the strongly pro-development agenda of the rest of the plan and fails to address the contradiction. History is unamenable to improvement, so the policy should commit the Council firmly to protecting and preserving our heritage assets from development. Instead, the specific policy pledge to "support development" that might "enhance" heritage assets leaves wide scope for abuse in the form of destructive commercialisation and financial leveraging of relevant sites.

This policy is based on the false premise that Guildford's heritage is inherently in decay. This is a developer's charter - a short step away from the idea that the historic environment needs to pay its way to be preserved. The Council's aggressive
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Development close to historical assets is harmful and should be expressly prohibited. This policy fails to meet the requirements of NPPF paragraphs 126 and 131-133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6379  Respondent: 10934625 / 7UK Services (Paul Taylor)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We write to make the following objection to the draft Local Plan on behalf of businesses and residents.

We note that the draft Local Plan still has no proposals to reduce the number of conservation areas. This is illogical and inconsistent with the other proposal in the draft plan to remove some villages from the Green Belt. The existing conservation areas should be reviewed, reduced in number, and concentrate only on those areas where they are integral to the character of the area. For example, the Guildford High Street should be retained (though even this has inconsistent buildings such as Sainsbury's). Some village centers, such as Shere, should be retained. Other areas, such as those outside of the Guildford High Street, where there are residential areas which have changed significantly from what they were originally, should have their conservation area status rescinded as it is no longer applicable. Any special buildings in these areas could be Listed if they are not already.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15378  Respondent: 10935201 / Cathryn Walton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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I OBJECT. This policy clashes with the strongly pro-development agenda of the rest of the plan and fails to address the contradiction. History is unamenable to improvement, so the policy should commit the Council firmly to protecting and preserving our heritage assets from development. Instead, the specific policy pledge to "support development" that might "enhance" heritage assets leaves ample scope for abuse in the form of destructive commercialisation and financial leveraging.

This policy is based on the false premise that Guildford’s heritage is inherently in decay. This is a developer’s charter – a short step away from the idea that the historic environment needs to pay its way to be preserved. The Council’s aggressive reviews of Guildford Museum and the Electric Theatre support this interpretation. Whatever the “reasoned justification”, the actual policy wording in the blue box leaves too many loopholes.

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I OBJECT to Policy D3 - Historic environment

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/676  Respondent: 10944513 / Amber Ellis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy D3

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I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6468  Respondent: 10949921 / Jan Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3049  Respondent: 10952705 / Moira Maidment  Agent:

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I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8811  Respondent: 10953921 / Alan Knox  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16736  Respondent: 10956161 / Pauline McCallister  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

The Garlick’s Arch (A43) proposal would double the built area in the locality, and would irrevocably damage the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4647  Respondent: 10957025 / Pauline Masters  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY D3
I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4658  Respondent: 10957025 / Pauline Masters  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY D3

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7245  Respondent: 10958177 / Brian Cooke  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the threat the Local Plan poses to the historic village of Ockham and to my Hamlet of Hatchford

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6656  Respondent: 10958753 / Ingrid Molossi  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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It is vital that villages like West and East Horsley are maintained in their current size to maintain historical values that are fast diminishing. It is important that our young are able to continue to live in such beautiful, historic areas of England, where they can still see history for themselves.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<th>Comment ID: PSLPP16/18402</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:

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Comment ID: PSLPP16/1228  Respondent: 10959425 / Jan Lofthouse  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. RURAL VILLAGE LIFE WITH GRADE 11 LISTED and HISTORIC BUILDINGS
   I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10484  Respondent: 10960033 / Lucinda Kalupka  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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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Comment ID: PSLPP16/12284  Respondent: 10962689 / Martin Ladd  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12291  Respondent: 10962689 / Martin Ladd  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14401  Respondent: 10962785 / Derek Gilmore  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3  
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: PSLPP16/14414  Respondent: 10962785 / Derek Gilmore  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3  
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: PSLPP16/11953  Respondent: 10967489 / Jenny Jackson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3) The Garlick’s Arch (A43) proposal would double the built area in the locality, and would irrevocably damage the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12971  Respondent: 10972065 / Sarah Cocke  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY D3

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12993  Respondent: 10972065 / Sarah Cocke  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
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1. **POLICY D3**

I OBJECT to Policy D3 - Historic environment

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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: PSLPP16/9215  **Respondent:** 10985057 / Anthony Parker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY D3 Historic environment – I PART SUPPORT, BUT PART OBJECT The policy appears reasonable. However, conserving and enhancing the historic environment may be damaged by supporting ancillary development. In historic locations (Chilworth Gunpowder Mills, the NT sites like Clandon Park or Hatchlands, Guildford Castle, Guildford Museum etc.) this policy needs to have an overriding emphasis on protection rather than supporting development. The emphasis on supporting some development – in the context of an authority that has already set in place aggressive reviews of Guildford Museum and the Electric Theatre – should be viewed with some caution. The justification seems reasonable but it must be noted that it is the wording of the policy, rather than the associated explanation, that must be key.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: PSLPP16/4990  **Respondent:** 10986689 / Richard Harris  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: PSLPP16/9031  **Respondent:** 10987905 / Marika Chandler  **Agent:**
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I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15606  Respondent: 10987905 / Marika Chandler  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:

Comment ID: PSLPP16/8378  Respondent: 10989601 / Margaret Mew  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 damage to the historic environment as a result of the scale of the proposed development (Policy D3)

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8330  Respondent: 10990145 / Anne Lee  Agent:
1. POLICY D3

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3) and to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8337  Respondent: 10990145 / Anne Lee  Agent: 

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Attached documents:

Comment ID: PSLPP16/14631  Respondent: 10992225 / Emma Ringshaw  Agent: 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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<th>Comment ID: PSLPP16/7026</th>
<th>Respondent: 10997121 / Rob Curling</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
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<td>I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3) I OBJECT to the local plan based on the impact it will have on the special countryside of the borough. The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.</td>
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</tbody>
</table>
Comment ID: PSLPP16/7063  Respondent: 10997121 / Rob Curling  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11180  Respondent: 10998081 / David Marshall  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11196  Respondent: 10998081 / David Marshall  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy D3 -- Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3211  Respondent: 11001505 / Greta Edwards  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy D3 - Historic environment
5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10419  Respondent: 11007073 / Gyles McIver  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

The Garlick’s Arch (A43) proposal would permanently destroy the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15304  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 the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10445  Respondent: 11007425 / Kate McIver  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

The Garlick’s Arch (A43) proposal would permanently destroy the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3968  Respondent: 11008225 / Russell Pascoe  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7567  Respondent: 11010401 / J M Bates  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7591  Respondent: 11010401 / J M Bates  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13950  Respondent: 11012161 / Wendy Gathercole  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2462  Respondent: 11014881 / Linda Peters-Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy D3 - Historic Environment

I object.

This should oppose not support development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2049  Respondent: 11023585 / Jean Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

8 I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.
The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11673  Respondent: 11024257 / Jenny Richardson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

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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: PSLPP16/708  Respondent: 11029409 / John Lay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

7.) The damage caused to the historic environment as a result of the scale of the proposed development (Policy D3)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5631  Respondent: 11029409 / John Lay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the threat the Local Plan poses to the historic rural village of Ockham and the bUght on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban style buildfngs up to five storeys high and a population density higher than most London boroughs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to policy D3 Historic Environment. This policy clashes with the strongly pro-development agenda of the rest of the plan and fails to address the contradiction. History is unamenable to improvement, so the policy should commit the Council firmly to protecting and preserving our heritage assets from development. Instead, the specific policy pledge to “support development” that might “enhance” heritage assets leaves wide scope for abuse in the form of destructive commercialisation and financial leveraging of relevant sites. This policy is based on the false premise that Guildford’s heritage is inherently in decay. This is a developer’s charter – a short step away from the idea that the historic environment needs to pay its way to be preserved. The Council’s reviews of Guildford Museum and the Electric Theatre support this interpretation. Whatever the “reasoned justification”, the actual policy wording in the blue box leaves too many loopholes. Development close to historical assets is harmful and should be expressly prohibited. This policy fails to meet the requirements of NPPF paragraphs 126 and 131-133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets. Taken together with the current Council policy of “sweating assets” I fear this policy leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

8. I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/11553  Respondent: 11042433 / Sam Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I object to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12714  Respondent: 11042433 / Sam Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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 based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5502  Respondent: 11043553 / Geraldine Banks  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY D3

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/5511  Respondent: 11043553 / Geraldine Banks  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY D3

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14600  Respondent: 11044129 / Christopher Barrass  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

The proposed development at Gosden Hill Farm will also impact Ancient Woodland.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14611  Respondent: 11044129 / Christopher Barrass  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

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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Attached documents:

Comment ID: PSLPP16/12995  Respondent: 11047873 / Mary Waldner  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY D3

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7566  Respondent: 11049473 / Victor Bates  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7590  Respondent: 11049473 / Victor Bates  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12835  Respondent: 11053825 / Claire Owen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)
I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12845  Respondent: 11053825 / Claire Owen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy D3 - Historic environment
I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12323  Respondent: 11054049 / Clare Goodall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY D3

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)
I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.
The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12333  Respondent: 11054049 / Clare Goodall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY D3

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14249  Respondent: 11061185 / Peter Komisarczuk  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I strongly object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

We live close to Garlick’s Arch (A43) and this proposal would double the built area in the locality. I strongly believe that it would irrevocably damage the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees.

I have noted that access to the fields have been restricted recently – a truck deposited a whole pile of soil at the access to the left of Burnt Common Lane back in June. I don’t know if there was right of way at this point of access, but it has been there as an established point of entry for a very long time.

Obviously there is going to be ill will generated and I am deeply saddened by this turn of affairs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16742  Respondent: 11070113 / Alison Hague  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
4. POLICY D3

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3).

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16748  Respondent: 11070113 / Alison Hague  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

8. POLICY D3

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8841  Respondent: 11071553 / Nicholas Roberts  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY D3 (HISTORIC ENVIRONMENT) – I object. This is a manifesto for over-development and the commercial Disneyfication of historic sites. It is trying to “enhance” history, which is futile. It also disregards NPPF paras 126-133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12390  Respondent: 11074465 / Louise Vaughan  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY D3

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12398  Respondent: 11074465 / Louise Vaughan  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY D3

1. I OBJECT to Policy D3 - Historic environment

I object to this Policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6492  Respondent: 11074561 / Tim Anderson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY D3

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15862  Respondent: 11098369 / Neil & Nicki Covington  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

WE OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)
WE OBJECT to the local plan based on the impact it will have on the special countryside of the borough.
The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16124  Respondent: 11100193 / Michael Turner  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to policy D3 Historic Environment. This policy clashes with the strongly pro-development agenda of the rest of the plan. The policy should commit the Council firmly to protecting and preserving our heritage assets from development. Instead, the specific policy pledge to “support development” that might “enhance” heritage assets leaves wide scope for abuse in the form of destructive commercialisation and financial leveraging of relevant sites. This policy is based on the false premise that Guildford’s heritage is inherently in decay. Any development close to historical assets which is harmful should be expressly prohibited. This policy fails to meet the requirements of NPPF paragraphs 126 and 131-133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15844  Respondent: 11150913 / Sarah Marshall  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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: PSLPP16/15851</th>
<th>Respondent: 11150913 / Sarah Marshall</th>
<th>Agent:</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: PSLPP16/1129</th>
<th>Respondent: 11151617 / Nigel Tallick</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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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17219  Respondent: 11832961 / The National Trust - London and SE (Rachel Botcherby)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We support this policy. In terms of detailed policies for the protection and enhancement of the historic environment we understand that these will be prepared as part of the ‘Development Management Policies’ document and we look forward to contributing to this, particularly regarding continued protection for the Corridor of the River Wey, which we believe is a useful and important policy. We also look forward to assisting with the preparation of any Conservation Area Appraisals that the Council is undertaking which include or affect National Trust property, such as the River Wey, West and East Clandon 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: pslp171/2439  Respondent: 14177313 / Ian Macpherson

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

page 118 BOX MONITORING INDICATORS

“Reduction in percentage of appeals allowed” sounds like an invitation to refuse little or nothing in the first place. Obj. redraft

Page 121

as above 118

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2484  Respondent: 14181313 / Vision for Guildford Ltd - GVG (William Stokoe)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Page 139 of 266
The Guildford Vision Group, a group of concerned residents with very relevant commercial and professional experience, was established four years ago to press for reinvigoration of the town centre. Specifically we have called for six objectives:

1. Wider pedestrianisation of the town centre
2. Exciting new public space along a reinvigorated riverside
3. Redirection of vehicle traffic away from the centre
4. An integrated transport hub and interchange around the rail station
5. New town centre housing
6. A new and better East-West link

These are not unusual or unique objectives. They are the aim of a multitude of UK towns and cities, where many have taken positive action to bring them about. Many would envy Guildford its magnificent setting and the river running through the centre of town, yet Guildford has failed significantly over the past decades to take full advantage of its potential, especially its river. Riverside areas are taken up by surface car parks, buildings with their back to the water and suffer a legacy of piecemeal, unattractive light industrial development. Walnut Tree Close and Woodbridge Meadows, in particular, should be given over to well-planned housing and the scattered light industrial provision should be relocated to an expanded Slyfield where infrastructure and communications would be better suited.

We are thus disappointed by the lack of real ambition and aspiration in the Local Plan in respect of the town centre. There are no substantial coordinated policies or strategies in the Local Plan that will achieve the six objectives above. These objectives have received wide public support, as recognised by:

- Our 2013 document ‘Guildford on the Way’, a Vision for Guildford in 2030 (attached) as articulated by members of the public, Guildford residents and our members
- Comments and feedback from our public meetings over the past four years that have regularly attracted audiences of 200 and above
- Feedback from our frequent Newsletters to our supporters, interested parties and councillors

The council, in response to our lobbying, commissioned a masterplan for the centre. The masterplan was drawn up by Allies & Morrison, nationally-renowned masterplanners. The masterplan was approved by the council in March 2016 but is yet to be adopted. There is little recognition or acknowledgement of the masterplan in either the Local Plan policies, underpinning information or implementation strategies. We understand that the council propose an Area Action Plan (AAP) for the town centre once the Local Plan is adopted. We are concerned that the AAP will be subject to challenge if its aims are not foreshadowed in the Local Plan. We believe omission of any mention of the AAP could render the Local Plan unsound in this respect.

**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: PSLPP16/4780  Respondent: 15084897 / Save Send Action Group (Andrew Procter)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

29 POLICY D3 HISTORIC ENVIRONMENT

29.1 I object to policy D3 Historic Environment

29.2 This policy clashes with the strongly pro-development agenda of the rest of the plan and fails to address the contradiction. History is unamenable to improvement, so the policy should commit the Council firmly to protecting and preserving our heritage assets from development. Instead, the specific policy pledge to “support development” that might “enhance” heritage assets leaves wide scope for abuse in the form of destructive commercialisation and financial leveraging of relevant sites.

29.3 This policy is based on the false premise that Guildford’s heritage is inherently in decay. This is a developer’s charter – a short step away from the idea that the historic environment needs to pay its way to be preserved. The Council’s aggressive reviews of Guildford Museum and the Electric Theatre support this interpretation. Whatever the “reasoned justification”, the actual policy wording in the blue box leaves too many loopholes.

29.4 Development close to historical assets is harmful and should be expressly prohibited. This policy fails to meet the requirements of NPPF paragraphs 126 and 131-133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8944  Respondent: 15107297 / Ian McQuattie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY D3 (HISTORIC ENVIRONMENT):

• Supports overdevelopment: you can’t “enhance” history. Doesn’t ban private interests from trying to make aggressive profits from privatising, commercialising and Disneyfying public historic assets.
• Doesn’t ban development near historic assets.
• Ignores NPPF 126, 131, 132, 133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/171  Respondent: 15109537 / Elizabeth Alexander  Agent:
<table>
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<tr>
<th>Comment ID: PSLPP16/2814</th>
<th>Respondent: 15109537 / Elizabeth Alexander</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 against the Local Plan. I feel that in the Historic Environment section especially, the local plans ride roughshod over the hopes, feelings and consideration of all people living in those areas. This could be the ruination of Surrey as we know it.</td>
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<td>I refer in particular to 11.31 and 11.32 which deal with development adjacent to and within the conservation areas. The possible development of these areas do not take into account the height of new buildings on the skyline - and the Wisley development in particular where blocks of flats will dominate views as far as the Surrey Hills.</td>
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<td>As Junction 10 on the M25 will have to be completely rebuilt, this whole area including RHS Wisley Gardens will be ruined for ever.</td>
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<td>5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.</td>
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<th>Comment ID: PSLPP16/553</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. No protection of heritage assets
I STRONGLY OBJECT to the development proposed in the Local Plan as I don’t believe there has been any consideration for the protection of our heritage assets.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18700  
**Respondent:** 15145377 / WYG (S Fidgett)  
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy D3 Historic Environment

5.16 We agree that where new development would have an impact on heritage assets, it should make a positive contribution to local character and distinctiveness having regard to the significance of the heritage assets and their setting.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5327  
**Respondent:** 15147841 / N Golbengan  
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

** I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/722  
**Respondent:** 15155201 / Ann Lay  
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

7.) The damage caused to the historic environment as a result of the scale of the proposed development. ( Policy D3
1. I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

1. I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

The Garlick’s Arch (A43) proposal would double the built area in the locality, and would irrevocably damage the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees.

E. I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3). Damage to ancient woodland – oak trees etc.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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The Garlick’s Arch (A43) proposal would double the built area in the locality, and would irrevocably damage the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees.

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<td>15244641 / Wesley Raynbird-Tilbury</td>
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POLICY D3 - Historic environment

I OBJECT. This policy clashes with the strongly pro-development agenda of the rest of the plan and fails to address the contradiction. History is unamenable to improvement, so the policy should commit the Council firmly to protecting and preserving our heritage assets from development. Instead, the specific policy pledge to "support development" that might "enhance" heritage assets leaves wide scope for abuse in the form of destructive commercialisation and financial leveraging of relevant sites.

This policy is based on the false premise that Guildford's heritage is inherently in decay. This is a developer's charter- a short step away from the idea that the historic environment needs to pay its way to be preserved. The Council's aggressive reviews of Guildford Museum and the Electric Theatre support this interpretation. Whatever the "reasoned justification", the actual policy wording in the blue box leaves too many loopholes.

Development close to historical assets is harmful and should be expressly prohibited. This policy fails to meet the requirements of NPPF paragraphs 126 and 131-133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
8. I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

The Garlick’s Arch (A43) proposal would double the built area in the locality, and would irrevocably damage the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1917  Respondent: 15253889 / Carole Gale  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

5) I object to lack of protection for heritage and environmental assets

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1936  Respondent: 15254113 / R Orchard  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)
I object to the local plan based on the impact it will have on the special countryside of the borough. The proposed development at Garlick's Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13705  Respondent: 15254337 / Ben Warwick  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1949  Respondent: 15254785 / M.D. Vickers  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3  
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 local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1971  Respondent: 15255553 / J.A. Vickers  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3  
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:
8.1 OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/2065  Respondent: 15263073 / James Walker  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

8.1 OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/2083  Respondent: 15263905 / Philip Walker  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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: PSLPP16/2097  Respondent: 15264001 / Robert Peake  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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? (No), is Sound? (No), is Legally Compliant? (No)

Policy to protect Historic Environment?

But planning on chopping down and building on top of an ancient woodland with trees from the 16th century. There are no exceptional circumstances for this plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11914  Respondent: 15275201 / Jennifer Morritt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

The Garlick’s Arch (A43) proposal would double the built area in the locality, and would irrevocably damage the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18677  Respondent: 15278465 / Chris Wright  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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: PSLPP16/10962  Respondent: 15282625 / Kelly Graves  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT TO POLICY D3 (HISTORIC ENVIRONMENT):
• Supports overdevelopment: you can’t “enhance” history. Doesn’t ban private interests from trying to make aggressive
profits from privatising, commercialising and Disneyfying public historic assets.
• Doesn’t ban development near historic assets.
• Ignores NPPF 126, 131, 132, 133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2563  Respondent: 15284993 / Samantha Thompson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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: PSLPP16/2578  Respondent: 15285121 / Audrey Boughton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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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: PSLPP16/2593  Respondent: 15285345 / Mike Boughton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object to policy D3 Historic Environment

This policy clashes with the strongly pro-development agenda of the rest of the plan and fails to address the contradiction. History is unamenable to improvement, so the policy should commit the Council firmly to protecting and preserving our heritage assets from development. Instead, the specific policy pledge to “support development” that might “enhance” heritage assets leaves wide scope for abuse in the form of destructive commercialisation and financial leveraging of relevant sites. This policy is based on the false premise that Guildford’s heritage is inherently in decay. This is a developer’s charter – a short step away from the idea that the historic environment needs to pay its way to be preserved. The Council’s reviews of Guildford Museum and the Electric Theatre support this interpretation. Whatever the “reasoned justification”, the actual policy wording in the blue box leaves too many loopholes. Development close to historical assets is harmful and should be expressly prohibited. This policy fails to meet the requirements of NPPF paragraphs 126 and 131-133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2831  Respondent: 15299425 / Tim and June Yorath  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY D3 - Historic environment

We object to this policy as it is very weak and we do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which we fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2858  Respondent: 15300385 / Mark Harding  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

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**Comment ID:** PSLPP16/3010  **Respondent:** 15312769 / Norah Johnson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

The Garlick’s Arch (A43) proposal would double the built area in the locality, and would irrevocably damage the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees, habitats for deer and kites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/3025  **Respondent:** 15312961 / Alison Johnson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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**Comment ID:** PSLPP16/3048  **Respondent:** 15314305 / Andrew Dennis  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to POLICY D3 - Historic environment

- Supports overdevelopment: you can’t “enhance” history. Doesn’t ban private interests from trying to make aggressive profits from privatising and commercialising public historic assets.
- Doesn’t ban development near historic assets.
- Development close to historical assets is harmful and should be expressly prohibited. Fails to meet the requirements of NPPF 126, 131, 132, 133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<td>East Horsley contains a wide range of heritage assets which make an important contribution to the look and feel of the village and its character. I fully support this policy.</td>
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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:
local community. In the case say, of Garlick's Arch there, is a sizeable woodland area, including ancient oak trees that will be destroyed.

They are all TPO'd and exist within an area of special scientific interests.

The impact of this loss will more exposure to the polluting effects of the A3 as well loss of vital habitat for wildlife. The NPPF allows for an overall housing target to be reduced to take account of situations like those at Garlick's Arch. Protecting wild life areas (Thames basin Heath SPA), areas of natural recreational resource, AONB, Scientific Interest Areas, Conservation areas, GB and flood risk parts; however, this Local Plan appears to completely ignore any of these requirements?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4401  Respondent: 15367361 / Greg Ganjou  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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Attached documents:

Comment ID: PSLPP16/4408  Respondent: 15367361 / Greg Ganjou  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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Comment ID: PSLPP16/4549  Respondent: 15368993 / Tessa Spink  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4603  Respondent: 15370497 / Edward Scott  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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Attached documents:

Comment ID: PSLPP16/4615  Respondent: 15370593 / A Gee  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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Comment ID: PSLPP16/4622  Respondent: 15370593 / A Gee  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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Attached documents:

Comment ID: PSLPP16/4712  Respondent: 15372417 / P. Mew  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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Attached documents:

Comment ID: PSLPP16/4833  Respondent: 15377953 / cctvtraining.com ltd (Gordon Tyerman)  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
POLICY D3 Historic environment

GROUNDS FOR OBJECTION conserving and enhancing the historic environment may be damaged by supporting ancillary development. In historic locations (Chilworth Gunpowder Mills, the NT sites like Clandon Park or Hatchlands, Guildford Castle, Guildford Museum etc) this policy needs to have an overriding emphasis on protection rather than supporting development. The emphasis on supporting some development – in the context of an authority that has already set in place aggressive reviews of Guildford Museum and the Electric Theatre – should be viewed with some caution. The reasoned justification seems reasonable but it must be noted that it is the wording of the policy, rather than the associated explanation, that must be key.

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: PSLPP16/4921  Respondent: 15380289 / Stephen Hewlett  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. No protection from local heritage sites

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

 Attached documents:

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Comment ID: PSLPP16/4935  Respondent: 15381089 / Tim Poyntz  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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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: PSLPP16/4942  Respondent: 15381089 / Tim Poyntz  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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: PSLPP16/4959  Respondent: 15381249 / Helen Poyntz  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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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: PSLPP16/4967  **Respondent:** 15381249 / Helen Poyntz  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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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: PSLPP16/5012  **Respondent:** 15382529 / Reuben Lee  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Comment ID: PSLPP16/5132  Respondent: 15386017 / Gareth Sinnett  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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Comment ID: PSLPP16/5139  Respondent: 15386017 / Gareth Sinnett  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5151  Respondent: 15386337 / Edna Slater  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity

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The Garlick’s Arch (A43) proposal would significantly increase the volume of housing in the locality. In addition it would irrevocably damage the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees with tree preservation orders.

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Comment ID: PSLPP16/5308  Respondent: 15389697 / Oliver Stewart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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Comment ID: PSLPP16/5318  Respondent: 15389697 / Oliver Stewart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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Comment ID: PSLPP16/5358  Respondent: 15390401 / William Stewart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5474  Respondent: 15398657 / Kim Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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Attached documents:

Comment ID: PSLPP16/5482  Respondent: 15398657 / Kim Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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I OBJECT to Policy D3 - Historic environment.

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5518  Respondent: 15399041 / Sue Ely  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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: 15400385 / Robert Bonnar</th>
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<th>Comment ID: PSLPP16/5651</th>
<th>Respondent: 15405857 / Raymond Mackay</th>
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Comment ID: PSLPP16/5679  Respondent: 15406017 / Eleanor Roberts  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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Comment ID: PSLPP16/5688  Respondent: 15406017 / Eleanor Roberts  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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Attached documents:

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The proposed development at Garlick's Arch (A43) will have a permanent impact on the character of the Ancient
Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak
trees. It is well documented that Oaks provided a habitat rich in biodiversity; supporting more life forms than any other
native tree species- which each Oak hoting hundreds of species of insect, supplying many native birds with an important
food source. Autumn mammals such as badgers and deer take advantage of the falling acorns. Development will see the destruction of these trees and further damage to the local biodiversity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6003  Respondent: 15420833 / Marjorie Moss  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
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Attached documents:

Comment ID: PSLPP16/6045  Respondent: 15422145 / Orlando Lee  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
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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: PSLPP16/16851  Respondent: 15422145 / Orlando Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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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: PSLPP16/6060  Respondent: 15422529 / David Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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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Comment ID: PSLPP16/6070  Respondent: 15422529 / David Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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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: PSLPP16/6092</th>
<th>Respondent: 15422849 / Ryan Clarke and Lauren Emberson</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: PSLPP16/6131</th>
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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
**Comment ID:** PSLPP16/6202  **Respondent:** 15426337 / C Cope  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the damage to the environment as a result of the scale of the proposed development (Policy D3)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/6250  **Respondent:** 15427489 / Andrew Isherwood  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

It is critical that the character of the town is preserved. The local plan fails to ensure this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/6264  **Respondent:** 15427617 / Ken Scotland  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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:** PSLPP16/6273  **Respondent:** 15427617 / Ken Scotland  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
15. POLICY D3

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I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which leaves plenty of scope for abuse.

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: PSLPP16/6870   Respondent: 15438049 / David A Sprigings   Agent:
Document:   Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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 due to the damage to the historic environment and heritage assets that would result from the excessive scale of the proposed development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10667   Respondent: 15438049 / David A Sprigings   Agent:
Document:   Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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: PSLPP16/6763   Respondent: 15438753 / Peter Fairbrass   Agent:
Document:   Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

5. I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (*with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.
*I would further object on the likelihood that such development in said or similar areas would eventually lead to the necessity of added facilities, amenities and infrastructure that could only serve in the destruction of our villages, rural areas and general way of life - envied by most of the rest of the world and thereby giving us one of the strongest tourist industries (and therefore large financial income) in Europe; damaging that would damage far more than just this borough’s income!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6795  Respondent: 15438945 / Jacqueline Davies  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to POLICY D3 - Historic environment

• Supports overdevelopment: you can’t “enhance” history. Doesn’t ban private interests from trying to make aggressive profits from privatising and commercialising public historic assets.
• Doesn’t ban development near historic assets.
• Development close to historical assets is harmful and should be expressly prohibited. Fails to meet the requirements of NPPF 126, 131, 132, 133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6826  Respondent: 15439425 / Abigail Cruse  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Garlick’s Arch (A43) proposal would double the built area in the locality, and would irrevocably damage the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPP16/7022  Respondent: 15442049 / Ellouise Fassom  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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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: PSLPP16/7059  Respondent: 15442049 / Ellouise Fassom  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7023  Respondent: 15442081 / Lauren Fassom  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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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: PSLPP16/7060  Respondent: 15442081 / Lauren Fassom  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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Attached documents:

Comment ID: PSLPP16/7137  Respondent: 15442913 / Inger Scotland  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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Attached documents:

Comment ID: PSLPP16/7146  Respondent: 15442913 / Inger Scotland  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7194  Respondent: 15445665 / Jonathan Hewlett  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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: PSLPP16/7228  Respondent: 15445793 / Jackie Withers  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)  
I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.  
The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.  
What changes (2016)/further amendments (2017) do you suggest should be made to the document?  
Attached documents:

---

Comment ID: PSLPP16/14377  Respondent: 15446401 / Louise Yandle  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

I OBJECT TO POLICY D3 (HISTORIC ENVIRONMENT):  
• Supports overdevelopment: you can’t “enhance” history. Doesn’t ban private interests from trying to make aggressive profits from privatising, commercialising and ‘Disneyfying’ public historic assets.  
• Doesn’t ban development near historic assets.  
• Ignores NPPF 126, 131, 132, 133.  
What changes (2016)/further amendments (2017) do you suggest should be made to the document?  
Attached documents:

---

Comment ID: PSLPP16/7284  Respondent: 15446753 / David Boyce  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3  
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 local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

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 based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7433  Respondent: 15448385 / Edward Bates  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7398  Respondent: 15448449 / Carol Roberts  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3).

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7435  Respondent: 15448449 / Carol Roberts  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPP16/7516  Respondent: 15449857 / Fiona Cumberland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7524  Respondent: 15449889 / Harriet Bell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7644  Respondent: 15450817 / Audrey Gachen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to POLICY D3 - Historic environment

- Supports overdevelopment: you can’t “enhance” history. Doesn’t ban private interests from trying to make aggressive profits from privatising and commercialising public historic assets.
- Doesn’t ban development near historic assets.
- Development close to historical assets is harmful and should be expressly prohibited. Fails to meet the requirements of NPPF 126, 131, 132, 133.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 15451041 / Iain Bell</th>
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Attached documents:

Comment ID: PSLPP16/7736  Respondent: 15451905 / Jonathan Withers  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7758  Respondent: 15451969 / Rosie Lee  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14574  Respondent: 15454881 / Mark Fielder  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Due to the proposed development of Garlick’s Arch (A43) the built area in the locality would double. There would be irrevocable damage the character of the Ancient Woodland on the site, which includes a significant number of ancient oak trees. This is a resources that would be potentially lost forever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15095  Respondent: 15454945 / Claire Cassar  Agent:
Garlick’s Arch site includes ancient woodland comprising a substantial number of ancient oak trees. This woodland would be lost from our local heritage. The magnitude of the proposed development of Garlick’s Arch (A43) would comprise the environmental impact resulting in the loss of our local heritage.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Finally I object to the threat to our historic villages and their peace and beauty. I hope that, as you rejected planning permission for Wisley unanimously you will now have the three farms Meadows Wisley removed from the local draft plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7988  Respondent: 15457505 / Julie Gray  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3) I OBJECT to the local plan based on the impact it will have on the special countryside of the borough. The proposed development at Garlick's Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8900  Respondent: 15460353 / Elizabeth Hewlett  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3) The Garlick’s Arch (A43) proposal would double the built area in the locality, and would irrevocably damage the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8099  Respondent: 15461217 / S. Gilby  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

The proposed development at Garlick's Arch (A43) will impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8132  Respondent: 15461633 / Anna Wood  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8183  Respondent: 15462017 / Kevin Rhoades  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

8. I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

The Garlick’s Arch (A43) proposal would double the built area in the locality. There would be permanent damage to the character of the Ancient Woodland on site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8257  Respondent: 15462785 / Thomas McMinn  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

8. I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8355  Respondent: 15464673 / Trudy Grey  Agent:
8. POLICY D3

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8362  Respondent: 15464673 / Trudy Grey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

15. POLICY D3

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8410  Respondent: 15466113 / Tim Grey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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: PSLPP16/8445  Respondent: 15466177 / D.L. + E.J. Wilkinson  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY D3 (HISTORIC ENVIRONMENT):

• Supports overdevelopment: you can't "enhance" historic
• Doesn't ban private interests from trying to make aggressive profits from privatising, commercialising and Disneyfying public historic assets.
• Doesn't ban development near historic
• Ignores NPPF 126, 131, 132, 133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8530  Respondent: 15469249 / Daniel Harris  Agent:

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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: PSLPP16/8562  
**Respondent:** 15470145 / Linda Eyre  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPP16/8621  
**Respondent:** 15471489 / P Gilby  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the damage to the historic environment as a result of the scale of the proposed development

The proposed development at Garlick’s Arch (A43) will impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPP16/8601  
**Respondent:** 15472097 / Bernard Eyre  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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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: PSLPP16/8676  Respondent: 15474849 / Timothy Yorath  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8696  Respondent: 15474849 / Timothy Yorath  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

East Horsley contains a wide range of heritage assets which make an important contribution to the look and feel of the village and its character. I fully support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<td>I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) and limited public transport to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.</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: PSLPP16/9698  Respondent: 15485345 / Ruth Beavington  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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Comment ID: PSLPP16/9719  Respondent: 15485473 / Eilish Smith  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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Comment ID: PSLPP16/9778  Respondent: 15485985 / Jean Dunning  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to lack of protection of heritage assets and the environment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/10014  Respondent: 15495649 / Stephen Cruse  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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Comment ID: PSLPP16/10048  Respondent: 15495873 / Gerard Duvé  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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Historic Environment

I object to GBC not respecting the historic environment of the rural villages when considering inappropriate large developments. These areas need protecting, not destroying due to the effects of increased traffic, parking problems, etc.

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Comment ID: PSLPP16/10192  Respondent: 15497505 / Jyoti Nanda  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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Comment ID: PSLPP16/10305  Respondent: 15500161 / Joanna Scott  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
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Section page number 212 of 266  
Document page number 1889
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Comment ID: PSLPP16/10565  Respondent: 15504001 / Margaret Banks  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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Comment ID: PSLPP16/10701  Respondent: 15504929 / William Scott  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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Comment ID: PSLPP16/10935  Respondent: 15507553 / David Lawton Garner  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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Comment ID: PSLPP16/11087  Respondent: 15509057 / Richard Golding  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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I OBJECT. History is unamenable to improvement, so the policy should commit the Council firmly to protecting and preserving our heritage assets from development. Instead, the specific policy pledge to “support development” that might “enhance” heritage assets leaves wide scope for abuse in the form of destructive commercialisation and financial leveraging of relevant sites.

This policy is based on the false premise that Guildford’s heritage is inherently in decay. This is a developer’s charter – a short step away from the idea that the historic environment needs to pay its way to be preserved. The Council’s aggressive reviews of Guildford Museum and the Electric Theatre support this interpretation. Whatever the “reasoned justification”, the actual policy wording in the blue box leaves too many loopholes.

Development close to historical assets is harmful and should be expressly prohibited. This policy fails to meet the requirements of NPPF paragraphs 126 and 131-133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPP16/11286  Respondent: 15570145 / Owen Eszeki  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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Policy D3 - Historic Environment

I object to GBC not respecting the historic environment of the rural villages when considering inappropriate large developments. These areas need protecting, not destroying due to the effects of increased traffic, parking problems, etc

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Comment ID: PSLPP16/11283  Respondent: 15570209 / Emily Cross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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Comment ID: PSLPP16/11402  Respondent: 15571201 / Zoe Dudgeon  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3  
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Comment ID: PSLPP16/15305  Respondent: 15571201 / Zoe Dudgeon  Agent:  
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Comment ID: PSLPP16/11461  Respondent: 15571425 / Monika Neczaj  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT TO POLICY D3 (HISTORIC ENVIRONMENT):

- Supports overdevelopment: you can’t “enhance” history. Doesn’t ban private interests from trying to make aggressive profits from privatising, commercialising and Disneyfying public historic assets.
- Doesn’t ban development near historic assets.
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- **I object** to the damage to the historic environment - **Policy D3** - as a result of the scale of the proposed

  - The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland including over 80 ancient oak trees adjacent to the
  - The developments proposed will result in more traffic using the narrow roads in local villages and a further deterioration in the road Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development will only result in more traffic and more parking problems.
  - Cycling has become an ever popular past time, particularly at weekends; hundreds of cyclists pass through the villages on the way to the Surrey With no proper cycle lanes on the narrow local roads and with greater vehicle traffic being generated from these developments, there is a real danger that there will be an increase in road accidents involving cyclists.

  - The narrow rural roads do not have proper pedestrian
  - The council has a statutory obligation to protect the public and the additional traffic flows will bring added risk of injury to the In the case of West Clandon, the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**POLICY D3 - Historic environment**

I **object** to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets. Taken together with the current Council policy of “sweating assets” I fear this policy leaves plenty of room for abuse.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11521  Respondent: 15571681 / Anne Martin  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3) The Garlick’s Arch (A43) proposal would double the built area in the locality, and would irrevocably damage the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees. If this were to be destroyed it would never be replaceable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11532  Respondent: 15571745 / Hazel Thompson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3) I object to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11583  Respondent: 15571937 / S Bennell  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3) I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.
I object to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

I OBJECT to Policy D3 - Historic environment

I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I object to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

I object to the damage to the historic environment as a result of the scale of the proposed development

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** I object to the damage to the historic environment as a result of the scale of the proposed development

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/11834  Respondent: 15575009 / Tony Redknapp  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I object to the local plan based on the impact it will have on the special countryside of the borough. The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12035  Respondent: 15579137 / Nicodemus Brian Rhyner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12051  Respondent: 15579361 / Caroline May  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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 based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12090  Respondent: 15579553 / John Storry  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Please preserve our Cathedral in its unique setting – green spaces are disappearing everywhere in the Borough – let’s keep this one, it’s the most important urban lung Guildford’s still got!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12108  Respondent: 15579649 / Peter E May  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
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: PSLPP16/12214  Respondent: 15581665 / Laura Daboo  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
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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Comment ID: PSLPP16/12254  Respondent: 15581665 / Laura Daboo  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12217  Respondent: 15581761 / Peter Lee  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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: PSLPP16/12256  Respondent: 15581761 / Peter Lee  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12344  Respondent: 15582593 / Dermot McMullan  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12353  Respondent: 15582593 / Dermot McMullan  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12409  Respondent: 15583169 / Poul Jensen  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy D3 - Historic environment

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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: PSLPP16/12418  Respondent: 15583169 / Poul Jensen  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
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: PSLPP16/12462  Respondent: 15583585 / Josephine Rooke  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

** I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12461  Respondent: 15583617 / Deborah Gillam  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

** I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

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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: PSLPP16/12499  Respondent: 15583809 / Nigel Stephenson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

   The Garlick’s Arch (A43) proposal would double the built area in the locality, and would irrevocably damage
the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees and much other woodland.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12561  Respondent: 15584161 / Alexandra Elson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12569  Respondent: 15584161 / Alexandra Elson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12593  Respondent: 15584481 / Jeremy Hamilton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)
Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/12622  **Respondent:** 15584641 / Miriam Gilkerson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/12657  **Respondent:** 15584961 / Helen Meredith  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY D3

I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I object to the impact which the proposed local plan will have on special countryside. The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland which includes over 80 ancient oak trees that surrounds and runs through the site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/12727  **Respondent:** 15585441 / Laurie Will  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

8. I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.
The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/12766</th>
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1. POLICY D3

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3).

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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1. POLICY D3

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/12891  Respondent: 15587105 / John Downes  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/12906  Respondent: 15587137 / John Oliver  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy D3

“Guildford borough’s historic environment is intrinsically part of what makes Guildford the place it is. The historic environment includes many important heritage assets, both designated and undesignated, that contribute to the borough’s character, sense of place and quality of life”. Agreed. This is crucial to the identity of Guildford. One of the things that makes it feel historic is its firm boundaries. The Plan proposals elongate the town, detracting from its sense of separateness from its surrounding environment. In particular the proposals to the east (Gosden Hill and the nearby villages) mean that the definition between town and village becomes blurred and ends up as urban sprawl. It also represents a further increment towards being absorbed by outer London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/12990  Respondent: 15587233 / Jane Clark  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

The Garlick’s Arch (A43) proposal would double the built area in the locality, and would irrevocably damage the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

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Comment ID: PSLPP16/13147  Respondent: 15588065 / Nick Claxton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13218  Respondent: 15588897 / John Attridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Garlick’s Arch (A43) proposal doubles the built area locally and would irrevocably damage the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13230  Respondent: 15588929 / Alex Hutchings  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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POLICY D3

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Comment ID: PSLPP16/13256  Respondent: 15588929 / Alex Hutchings  Agent:

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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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</tbody>
</table>

| Comment ID: PSLPP16/13382  Respondent: 15590273 / Eunja Madge  Agent: |
| Document: | Proposed Submission Local Plan: strategy and sites 2016 / Policy D3 |
| **Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )** |
| **POLICY D3** |
| I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3) |
| I OBJECT to the local plan based on the impact it will have on the special countryside of the borough. |
| The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees. |
| **What changes (2016)/further amendments (2017) do you suggest should be made to the document?** |
| Attached documents: |

| Comment ID: PSLPP16/13400  Respondent: 15590273 / Eunja Madge  Agent: |
| Document: | Proposed Submission Local Plan: strategy and sites 2016 / Policy D3 |
| **Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )** |
| **POLICY D3** |
| I OBJECT to Policy D3 - Historic environment |
| I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse. |
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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 local plan based on the impact it will have on the special countryside of the borough.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPP16/14059  **Respondent:** 15601057 / Chris Vinall  **Agent:**  
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)  

The Garlick's Arch (A43) proposal would double the built area in the locality, and I fear this would irrevocably damage the character of Ancient Woodland located here, which includes over 80 ancient oak trees.  

What changes (2016)/further amendments (2017) do you suggest should be made to the document?  

Attached documents:

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**Comment ID:** PSLPP16/14066  **Respondent:** 15601057 / Chris Vinall  **Agent:**  
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)  

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.  

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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:** PSLPP16/14093  **Respondent:** 15601121 / Elspeth Anderson  **Agent:**  
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

I OBJECT to Policy D3 - Historic environment  

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.  

What changes (2016)/further amendments (2017) do you suggest should be made to the document?  

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I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3).

I object to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

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I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14172  Respondent: 15601217 / Patrick Barrass  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14141  Respondent: 15601249 / Ann Barrass  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14171  Respondent: 15601249 / Ann Barrass  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14201  Respondent: 15601473 / Joseph Fort  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14272  Respondent: 15601953 / Stephen Yandle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

• Supports overdevelopment: you can’t “enhance” history. Doesn’t ban private interests from trying to make aggressive profits from privatising, commercialising and ‘Disneyfying’ public historic assets.

• Doesn’t ban development near historic assets.
• Ignores NPPF 126, 131, 132, 133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14341  Respondent: 15602177 / Julia Hunt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to policy D3 Historic Environment

This policy clashes with the strongly pro-development agenda of the rest of the plan and fails to address the contradiction. History is unamenable to improvement, so the policy should commit the Council firmly to protecting and preserving our heritage assets from development. Instead, the specific policy pledge to “support development” that might “enhance” heritage assets leaves wide scope for abuse in the form of destructive commercialisation and financial leveraging of relevant sites. This policy is based on the false premise that Guildford’s heritage is inherently in decay. This is a developer’s charter – a short step away from the idea that the historic environment needs to pay its way to be preserved. The Council’s reviews of Guildford Museum and the Electric Theatre support this interpretation. Whatever the “reasoned justification”, the actual policy wording in the blue box leaves too many loopholes. Development close to historical assets is harmful and should be expressly prohibited. This policy fails to meet the requirements of NPPF paragraphs 126 and 131-133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14403  Respondent: 15602561 / Jonathan Clark  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

The Garlick’s Arch (A43) proposal would double the built area in the locality, and would irrevocably damage the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14440  Respondent: 15602817 / Paul Douek  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity

GBC has not published any details as how the 693 houses figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.

There is no schedule for Garlicks Arch (A43); the plan takes no account of the infrastructure required for this site and therefore it is not fit for purpose

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/14469  Respondent: 15603297 / Rony Douek  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3). Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16281  Respondent: 15603361 / Ann Watkins  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY D3 (HISTORIC ENVIRONMENT): • Supports overdevelopment: you can’t “enhance” history. Doesn’t ban private interests from trying to make aggressive profits from privatising, commercialising and Disneyfying public historic assets. • Doesn’t ban development near historic assets. • Ignores NPPF 126, 131, 132, 133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14547  Respondent: 15603489 / Simon Pitt  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14557  Respondent: 15603489 / Simon Pitt  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14617  Respondent: 15603905 / Michael Douek  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14662  Respondent: 15604289 / Lesley Pitt  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)
I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14679  Respondent: 15604289 / Lesley Pitt  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
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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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: PSLPP16/14798  Respondent: 15607425 / Louise Quy  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Garlick’s Arch (A43) proposal would double the built area in the locality, and I fear this would irrevocably damage the character of Ancient Woodland located here, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14809  Respondent: 15607553 / Penelope Gillmore  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3).

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14820  Respondent: 15607553 / Penelope Gillmore  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will "enhance" heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/14824  Respondent: 15607681 / Robin Hopwood  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14866  Respondent: 15608225 / Louise Wickham  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

** I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14873  Respondent: 15608289 / Olivia Marshall  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/14881  Respondent: 15608289 / Olivia Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14894  Respondent: 15608545 / Madeleine Ringshaw  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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 based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4914  Respondent: 15608801 / Beth Fuller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15116  Respondent: 15610433 / Clare Porter  Agent:
** I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity

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: PSLPP16/15213  Respondent: 15610913 / Gillian Hague  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) would have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15235  Respondent: 15611105 / Ramsey Shubbar  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

** I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15236  Respondent: 15611137 / Scott Hutchinson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
** I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15237  Respondent: 15611201 / Jed Alexander  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

** I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15306  Respondent: 15612481 / Gillian Culmer  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

** I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15420  Respondent: 15614497 / Hannah Yandle  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY D3 (HISTORIC ENVIRONMENT):
• Supports over development: you can’t “enhance” history. Doesn’t ban private interests from trying to make aggressive profits from privatising, commercialising and ‘Disneyfying’ public historic assets.
• Doesn’t ban development near historic assets.
• Ignores NPPF 126, 131, 132, 133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15484  Respondent: 15615745 / Nicholas Thompson  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT particularly strongly to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I ALSO OBJECT particularly strongly to the local plan based on the impact it will have on the special countryside of the borough. The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15490  Respondent: 15615745 / Nicholas Thompson  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15547  Respondent: 15616929 / Nigel Wickham  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15594  Respondent:  15617185 / Michelle Mitchell  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15628  Respondent:  15618305 / Lawrence Claridge  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15642  Respondent:  15618305 / Lawrence Claridge  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy D3 - Historic environment
I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT. This policy clashes with the strongly pro-development agenda of the rest of the plan and fails to address the contradiction. History is unamenable to improvement, so the policy should commit the Council firmly to protecting and preserving our heritage assets from development. Instead, the specific policy pledge to “support development” that might “enhance” heritage assets leaves wide scope for abuse in the form of destructive commercialisation and financial leveraging of relevant sites.

This policy is based on the false premise that Guildford’s heritage is inherently in decay. This is a developer’s charter – a short step away from the idea that the historic environment needs to pay its way to be preserved. The Council’s aggressive reviews of Guildford Museum and the Electric Theatre support this interpretation. Whatever the “reasoned justification”, the actual policy wording in the blue box leaves too many loopholes.

Development close to historical assets is harmful and should be expressly prohibited. This policy fails to meet their requirements of NPPF paragraphs 126 and 131-133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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We suggest that the section on the historic environment would be better placed within the "Protecting" section, rather than within the “Design” section as heritage management shares many common objectives and practices with other environmental protection policies.

Policy D8 mentions support for "development of the highest design quality”. We consider that this needs to be more clearly defined. Assessment of design quality and aesthetic appeal is of course highly subjective, but we would nevertheless recommend that at least some parameters for outlining a definition for “high quality” would be helpful in the implementation of this policy and suggest that this should be set out either in the supporting text or in an appendix. A possible approach could be for, “highest quality” to be required to satisfy the relevant "architectural interest" requirements that are commonly assessed as part of the Listing process for historic buildings (set out in “Principles of Selection for Listing Buildings”, DCMS, 2010).

The "Monitoring Indicators" table outlines that a "heritage asset register” is necessary: The Historic Environment Record can provide much of the necessary data which will be required to compile this and our Heritage Team would welcome the opportunity to assist.

Para 4.6.9

Page 109

We suggest this should be amended to "Developers will fund and deliver some infrastructure themselves......” rather than "Infrastructure providers will fund and deliver....."

Para 4.6.38

Page 117

This refers to “public” open space and yet the designation includes school playing fields to which public access is restricted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to the damage to the historic environment as a result of the proposed development (policy D3).

Garlick's Arch (A43) proposal would irrevocably damage the character of the Ancient Woodland which includes 80 ancient oak trees and double the built area in locality.

I object to the Strategic Housing Market Assessment figure of 693 houses per annum in the borough being too high.

This figure has more than doubled a figure of 322 used in previous plans. As the council will not publish the SHMA report and the Plan's proposed growth is based on this, the figure cannot be verified.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I object to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanently damaging impact on the character and wildlife of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.
References used by the Plan for the assessment of wildlife and habitats assessment is out of date – further species have been added to the BoCC 4 Amber list and Red list. Endangered species likely to be affected by the plans are:

Cuckoos
Turtle Doves
Lesser Spotted Woodpecker
Mistle Thrush
Grey Wagtail
Yellow Wagtail
Redwing (winter migrant)
Nightjar

No mention is given in the Plan or the Sustainability of specific rare and protected species resident or migrating through the area. There needs to be a full assessment of all those protected species that are likely to be in affected woodland, trees, hedgerows and heaths and those specifically found in the Thames Basin Heaths that could be dependent on these areas and their populations as wildlife corridors/stop overs/sources of food/breeding areas. Any assessment must include those species who might be difficult to see in normal circumstances – nocturnal species (bats, owls, badgers, foxes, nightjars), ground nesting animals, insects, invertebrates and birds (such as short eared owl – essentially invisible apart from when hunting), seasonal visitors, breeders and migrants, those with long gestations and short life spans, such as stag beetles, whose larvae remains under rotting trees and soil for up to 6 years before emerging as adults for a short period to mate and breed again.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/16368  **Respondent:** 15641281 / Paula Redmond  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/16872  **Respondent:** 15649601 / Laura Bushnell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to Policy D3 on historical environments. The policy is in contradiction to the idea of preserving our heritage and history, instead pledging to “support development” that might “enhance” sites of historical value, leaving room for commercial abuse and financial leveraging. This appears to put economic value over sentimental value, which is important in maintaining a sense of community. The site at Thatcher’s Hotel (Ref A36), for example, intrudes on the setting of Horsley Towers, a valuable site of local heritage.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICY D3 HISTORIC ENVIRONMENT

I object to policy D3 Historic Environment. This policy clashes with the strongly pro-development agenda of the rest of the plan. The policy should commit the Council firmly to protecting and preserving our heritage assets from development. Instead, the specific policy pledge to “support development” that might “enhance” heritage assets leaves wide scope for abuse in the form of destructive commercialisation and financial leveraging of relevant sites. This policy is based on the false premise that Guildford’s heritage is inherently in decay. Any development close to historical assets which is harmful should be expressly prohibited. This policy fails to meet the requirements of NPPF paragraphs 126 and 131-133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object due to the impact of large numbers of additional residents on local policing facilities which will be further overwhelmed. Surrey Police are currently unable to cope with dealing with local residents’ concerns [eg breach of law on PROWs on allocation A35] citing lack of resources.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17277  Respondent: 15674689 / Chris Baker  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17398  Respondent: 15682465 / Nick Beesly  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Design Policies: I am fully supportive of Design Policies D1"Making better places", D2 Sustainable design, construction and energy" and D3 "Historic Environment”.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17475  Respondent: 15687201 / Mandy Cox  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

The Garlick’s Arch (A43) proposal would double the built area in the locality, and would irrevocably damage the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17615  Respondent: 15688481 / Sally Lescher  Agent:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17612</th>
<th>Respondent: 15689793 / Gladman Developments (Mat Evans)</th>
<th>Agent:</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</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>
<td>Gladman acknowledge the importance of the historic environment and the important role the Council has in ensuring its continued protection and enhancement. However, we believe that the policy as written at present is at odds with NPPF paragraph 134. Whilst it is clearly acknowledged what the NPPF states in paragraphs 132 and 133 about the substantial harm or total loss of a heritage asset policy D3 does not recognise the wording in NPPF paragraph 134. That talks about weighing the harm done to the heritage asset against the public benefits, the wording currently within D3, in our view goes a step beyond this.</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>Attached documents:</td>
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<tr>
<th>Comment ID: PSLPP16/17687</th>
<th>Respondent: 15694113 / Claire Netherton</th>
<th>Agent:</th>
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<td>Object to the threat the Local Plan as drafted poses to the historic rural settlements of Ockham, Hatchford and Downside.</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>Comment ID: PSLPP16/17978</td>
<td>Respondent: 15711265 / Jonathan Dowling</td>
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<th>Comment ID: PSLPP16/18302</th>
<th>Respondent: 15716833 / Charlie Bentham</th>
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<tr>
<th>Comment ID: PSLPP16/18427</th>
<th>Respondent: 15724353 / Arvnid Parmar</th>
<th>Agent:</th>
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</table>
Comment ID: PSLPP16/18443  Respondent: 15724353 / Arvnid Parmar  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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: PSLPP16/18461  Respondent: 15724673 / Matthew Bell  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18470  Respondent: 15724801 / Talei Fawcett  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18510  Respondent: 15725409 / Nicholas Ward  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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It is important that new development achieves a good level of design that respects existing character, however, the Council have a balancing exercise to ensure that they make the maximum productive use of identified sites in order to ensure that the most important ‘natural, built and heritage environments are protected.’ Including making maximum use of sustainably located sites within and adjoining existing settlements.

The Council must also be careful to ensure that unrealistic design standards or the constraints of historic character do not undermine the delivery of new growth.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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</table>

A number of parts of the Borough do not have a Conservation Area Character Appraisal; including the Ripley Conservation Area.

To ensure the robustness of this policy the Council should produce an Appraisal which takes account of the proposed changes to the settlement boundary and planned future development.

With regard to undesignated assets these should be reviewed in light of the challenges posed by the current Plan Review process. Such assets should not prejudice the delivery of new development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/738</th>
<th>Respondent: 17303553 / Anita Fitchie</th>
<th>Agent:</th>
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</table>
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The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

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I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

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:
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

Document part: Policy D4 - Character and design of new development
### Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

<table>
<thead>
<tr>
<th>Comment ID: pslp171/2597</th>
<th>Respondent: 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>The policy itself should include promoting “green approaches”, which should apply to arterial routes into and through settlements not just to the outer edges of settlements. This feature is part of local distinctiveness in the borough. The proposed monitoring target does not work. It will have the perverse consequence of discouraging opposing insensitive development to avoid appeal. Suggest annual assessment of indicators by a borough design panel. If there is a desire to avoid duplication and bring all design, density and character policy into one place, it is suggested the sequence is changed so D4 becomes D2. This would assist a user of the Plan to follow the logic more clearly. The linkage between D4 (as currently labelled) and D1 should be made clearer. The expectation larger schemes will apply both policies should also be clearer.</td>
<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: pslp171/1870</th>
<th>Respondent: 8561377 / The Guildford Society (Julian Lyon)</th>
<th>Agent:</th>
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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>ddddd) With the reservation expressed above (under Policy D1), we are generally very happy with the proposed newly worded Policy D4 which should serve the Borough well. We are, however, concerned that the height, bulk and massing of buildings is not well covered in this section and, in the absence of a Development Management Local Plan, we feel this needs to be expressed in more robust terms here – including the retention and protection of key cross-town views and views to the surrounding AONB. eeee) On the whole, the new paragraphs 4.5.49a and 4.5.49b are acceptable to the Society.</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: PSLPP16/6181</th>
<th>Respondent: 8562273 / The Clandon Society (Christopher Dean)</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>POLICY D4 - Development in urban areas and inset villages</td>
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</table>

Document page number 1945
We object to this policy:

1. The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.
2. The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately and is not sustainable.

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: PSLPP16/378  Respondent: 8565153 / Mr David Gianotti  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

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: PSLPP16/2198  Respondent: 8570273 / Fiona Curtis  Agent: Fiona Curtis
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

I object to policy D4 Development in urban areas and inset villages.

This policy that does not address the opportunity for building in the urban area. The plan envisages that 40% of homes built will be “affordable”, but this does not provide any accommodation for low-paid workers, for example, those on the minimum wage, who cannot afford to buy so-called “affordable” homes or pay an “affordable” rent. There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low-paid workers such as those employed in the retail, warehousing and distribution sectors (all of which this plan aspires to expand). The number of homes planned in the urban area is much too low. There is a glaring need for regeneration in many urban areas, particularly Guildford Town Centre but this is ignored in favour of building homes on greenfield sites instead. This will not address urban housing needs. It is also unsustainable, since building outside the town does disproportionate harm to road traffic, air quality and overstretched infrastructure. The plan envisages a large expansion of the retail sector, but this is hard to justify because the sector is in rapid and continuous decline.
In Compton conservation area one house is currently being built. Having experienced dust, noise, vibration, traffic lights, traffic congestion etc it is hard to see how building many more houses in other areas can avoid the same? Is policy D4 workable? Building houses is a noisy messy business or is this policy just paving the way to build the vast majority of houses on green fields?

Does planning in other areas including conservation areas have such protection? I agree that it should, but this level of protection should apply to all areas and not just in the town and inset villages.

Some areas may conduct their own landscape character assessment and this should be permissible.

Building is permitted in settlement areas in way of infill and this should be subject to the same level of protection.

Given the need for up to date design, i would say that anything written in 2004 is probably dated in terms of design (pink box)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/293  Respondent: 8571521 / Surrey Nature Partnership (Sarah Jane Chimbwandira)  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy D4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

There may be an opportunity here through the re-drafted policy to link aspirations for achieving a biodiversity net gain with those for high standards in development design.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13054  Respondent: 8573793 / Harry Eve  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

82. This policy is another example of hypocrisy.

The proposal to inset villages will completely change them and nowhere is this more so than the Horsleys which appear to have been singled out for change from a low density village to an urban sprawl regardless of local concerns. A major constraint on the housing number is needed and the proposal to inset villages must be removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1703  Respondent: 8573793 / Harry Eve  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy D4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

See my comments on Policy H1.

(The section on density has been removed and a reduced statement placed in Policy D4. The point that higher density development will be supported in the town centre has been lost in the process as has the explanation in 4.2.8. These points should appear in the Policies and I object to this change.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7027  Respondent: 8575617 / Effingham Parish Council (Ian Symes)  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

D4 Design - Development in urban areas and inset villages

Support

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17332  Respondent: 8579649 / Home Builders Federation (Mr James Stevens)  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We consider that the first part of the policy is unsound in relation to allocated sites because it is unjustified, ineffective and contrary to national policy.

The first part of the policy places conditions on the residential development of sites in the urban areas of Guildford, Ash and Tongham. We consider that these conditions are unnecessary in connection with allocated sites since it is the function of the local plan to weigh-up whether development in these locations is appropriate. If development is inappropriate, or there is doubt as to whether it would be, then they should not be allocated. We are concerned that the vagaries of the policy will allow the principle of residential development in these locations to be revisited. This would not provide the certainty for applicants required under our plan-led system.

We appreciate that in the case of non-allocated sites it would be necessary to stipulate these conditions. Allocated sites – those which are deemed sustainable by virtue of being allocated in the local plan – should be able to come forward without delay (NPPF, paragraph 15).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17567  Respondent: 8581505 / Burpham Neighbourhood Forum (Jim Allen)  Agent:
Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

No comment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12184  Respondent: 8582017 / The Clandon Society (J Wright)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13522  Respondent: 8582977 / Guildford Environment Forum (John Bannister)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY D4

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICY D4: Character and design of new development

Introduction

4.5.45a This added paragraph is welcomed.

POLICY D4 is welcomed as applying to all new development.

I support Policy D4 and paragraph 4.5.45a.

4.5.49a, 1st sentence

It is written: “We will expect development to respond to local character and history reflecting the identity of its context whilst allowing for innovative and forward thinking design.” The addition of the words ‘where appropriate’ at the end of this sentence would allow more flexibility. Whereas an innovative modern design can be a wonderful addition, it can also be a disaster in the wrong place. Modern designs which quickly deteriorate need to be avoided.

I object to the lack of flexibility in the sentence above.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
• The plan envisages that 40% of homes built will be affordable, but this does not provide any accommodation for low paid workers, for example, those on the minimum wage, who cannot afford to buy “affordable” homes, nor can they pay the so-called “affordable” rent. There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low paid workers such as those employed in the retail, warehousing and distribution sectors.

• The number of homes planned in the urban area is too low – there is a need for regeneration in some areas, but this is ignored and instead the plan concentrates on building homes on green field sites, which does not meet the needs for housing within the town, especially with the centre. This is not a sustainable policy as building outside the town has a disproportionate effect on road traffic.

• The plan envisages a large expansion of the traditional “bricks and mortar” retail sector, but this is a sector in long term decline.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17374  Respondent: 8596673 / Peta Malthouse  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objection to Policy D4 Development in urban areas and inset villages

Development in urban areas should be vastly different to development in villages. In this the two are lumped together.

Most of Guildford's villages contribute to the openness of the countryside. Their buildings are generally low rise and widely spaced, giving views of the surrounding countryside. The nature of the Guildford countryside will be spoiled if the open character of its villages is damaged. Allowing urban density development within inset villages will damage villages. Development is possible in washed-over villages, either by using brownfield sites such as redundant garages and pubs, or permitted development, such as rural exception housing. It is these types of developments that will preserve the character of the countryside. D4 seeks to suburbanise the countryside. Indeed we have already seen the effect of this at ‘Cunningham Close’ and Beech Lane’ where the developers have been allowed to build in effect 3 story buildings using town density rates (NPPF para 86) Beech Lane was an ‘exception site’ yet problems with flooding which have been exacerbated by this build have been ignored

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1267  Respondent: 8608865 / WBDRA. (David Bird)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

WBDRA SUPPORTS this policy

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/2394  Respondent: 8609217 / West Clandon Parish Council (John Stone)  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY D4 - Development in urban areas and inset villages

We object to this policy:

1. The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

1. The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12577  Respondent: 8627009 / East Clandon Parish Council (Sibylla Tindale)  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy D4: I object to the insetting of villages (meaning in fact, removal of villages from Green Belt protections) and the fact that they will suffer from higher density development and the resulting increase in traffic, increased use of infrastructure which is already under pressure. I object in particular to the insetting of West Clandon, Send and the Horsleys. This will have a detrimental impact on Green Belt openness and the views in and out of the AONB in direct contravention of Policy P1 and P2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9857  Respondent: 8627393 / Worplesdon Parish Council (Gaynor White)  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

D4 Development in Urban Areas and inset villages Support.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy D4: Development in urban areas and inset villages

Response

Summary

I OBJECT. There are effectively two separate parts to this policy, both are flawed, and in the case on insetting, fatally flawed. In the case of urban development there are numerous flaws, including:

The plan envisages that 40% of homes built will be affordable, but this does not provide any accommodation for low paid workers, for example, those on the minimum wage, who cannot afford to buy “affordable” homes, nor can they pay the so-called “affordable” rent. There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low paid workers such as those employed in the retail, warehousing and distribution sectors.

The number of homes planned in the urban area is too low – there is a need for regeneration in some areas, but this is ignored and instead the plan concentrates on building homes on green field sites, which does not meet the needs for housing within the town, especially with the centre. This is not a sustainable policy as building outside the town has a disproportionate effect on road traffic.

The plan envisages a large expansion of the traditional “bricks and mortar” retail sector, but this is a sector in long term decline.

Urban development

There is a fundamental flaw in the draft Local Plan, in that there are not enough dwellings planned in urban areas, in particular, Guildford town centre. This is where the demand for affordable homes is most acute, a fact which is recognised in much of the draft Local Plan. Yet the plan then envisages that most dwellings will be built outside the urban area, so there is no continuity in the plan – if the demand for affordable homes is most acute within the town, then is where these dwellings should be built. There are sites available, for example, various sites in Woodbridge Meadows, Walnut Tree Close (including the area around the station) and North Street. Yet the focus in these areas is to provide a very limited number of dwellings, with the emphasis on additional retail space and more commercial premises. Given the profound changes in traditional retail, this is not a sustainable policy. There have been many examples of bankruptcies amongst traditional retailers, the most recent examples being BHS and Austin Reed, and previously Woolworths, Comet, etc. The British Retail Consortium forecast that by 2020 up to one third of those now employed in traditional retail could lose their jobs, due to a combination of the move to the internet and higher costs, from business rates and increases in the minimum wage. Recent figures show that online sales are still growing quickly, with more than 13% of total retail sales now made over the internet. Nor does an expansion in traditional retail chime with the objective of attracting highly paid jobs to the area – the majority of jobs in retail are low paid, with zero hours contracts and usually a pay rate based on the minimum wage. So any expansion in traditional bricks and mortar retail would create a greater demand for affordable and social housing – exactly the reverse of what is needed.
Even the major grocery retail chains have been affected by changes in retail habits – Tesco, Sainsbury's, Morrisons, etc are closing some stores, with no major large stores planned. Banks and other financial institutions are still closing some branches, so changes in town centres still have some way to go – but none of these changes are recognised in the draft Local Plan, which envisages no limit to traditional retail.

There is another reason why the retail sector is unlikely to exhibit long term growth, and this is consumer debt, which has reached a level that the Bank of England have said could contribute to economic stability. This is likely to have a greater destabilising effect in the event of an economic downturn – and there will certainly be at least two of these during the life of the Local Plan. Retail spending simply cannot be maintained indefinitely at its current rate, and to plan for a large increase in consumer spending is irresponsible.

So there has to be a reappraisal of the urban development plans, with more homes provided in urban areas, in particular in the centre of Guildford, before there is any consideration of building outside the urban area. These are not separate policies to be considered separately, but hang together as part of a holistic plan. As the council own many sites in the centre, these could be made available for development within the first 5 years of the plan, with mixed housing on these sites, including new social housing, which is sorely needed. Affordable housing is simply not affordable to anyone on the minimum wage, there is a need for a considerable expansion of social housing, a need that is not adequately recognised in the draft Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10094  Respondent: 8640353 / Julian Cranwell  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4 
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We object to policy D4 Development in urban areas and inset villages

Summary

There are effectively two separate parts to this policy, both are flawed, and in the case on insetting, fatally flawed. In the case of urban development there are numerous flaws, including:

- The plan envisages a large expansion of the traditional “bricks and mortar” retail sector, but this is a sector in long term decline.
- The plan envisages that 40% of homes built will be affordable, but this does not provide any accommodation for low paid workers, for example, those on the minimum wage, who cannot afford to buy “affordable” homes, not can they pay the so-called “affordable” rent. There is a great need for an expansion in social housing, especially in urban areas, where there is a greater concentration of low paid workers such as those employed in the retail, warehousing and distribution sectors.
- The number of homes planned in the urban area is too low – there is a need for regeneration in some areas, but this is ignored and instead the plan concentrates on building homes on green field sites, which does not meet the needs for housing within the town, especially with the centre. This is not a sustainable policy as building outside the town has a disproportionate effect on road traffic.

In the case of insetting, the policy is fatally flawed, for two separate reasons.

- Firstly, it is based on an erroneous assumption. GBC justify the policy (in para 4.5.50) by suggesting, without any supporting data, that development in villages washed over by the green belt is at a lower rate than within Guildford town. This is not the case, and statistics from the ONS censuses of 2001 and 2011 show that this is
assumption is incorrect. These statistics show that the growth rate in housing was higher in, for example, Effingham, a village washed over by the green belt than Merrow, a suburb of Guildford which is not washed over by the green belt. In fact, the rate of increase in housing stock in Effingham was faster than the average for the borough.

- Insetting has been based on the assumptions set out in the Green Belt and Countryside Study, but this is not referred to as part of the Evidence base. The analysis in this document was flawed to the extent that it is valueless. It has serious flaws in its methodology, includes subjective judgements, and thus its conclusions are flawed. These flaws are so serious that it should be removed from the evidence base that supports the Local Plan. However, removing the reference but retaining the decision process means that the decisions are based on flawed assumptions.

Urban development

There is a fundamental flaw in the draft Local Plan, in that there are not enough dwellings planned in urban areas, in particular, Guildford town centre. This is where the demand for affordable homes is most acute, a fact which is recognised in much of the draft Local Plan. Yet the plan then envisages that most dwellings will be built outside the urban area, so there is no continuity in the plan – if the demand for affordable homes is most acute within the town, then is where these dwellings should be built. There are sites available, for example, various sites in Woodbridge Meadows, Walnut Tree Close (including the area around the station) and North Street. Yet the focus in these areas is to provide a very limited number of dwellings, with the emphasis on additional retail space and more commercial premises. Given the profound changes in traditional retail, this is not a sustainable policy. There have been many examples of bankruptcies amongst traditional retailers, the most recent examples being BHS and Austin Reed, and previously Woolworths, Comet, etc. The British Retail Consortium forecast that by 2020 up to one third of those now employed in traditional retail could lose their jobs, due to a combination of the move to the internet and higher costs, from business rates and increases in the minimum wage. Recent figures show that online sales are still growing quickly, with more than 13% of total retail sales now made over the internet. Nor does an expansion in traditional retail chime with the objective of attracting highly paid jobs to the area – the majority of jobs in retail are low paid, with zero hours contracts and usually a pay rate based on the minimum wage. So any expansion in traditional bricks and mortar retail would create a greater demand for affordable and social housing – exactly the reverse of what is needed.

Even the major grocery retail chains have been affected by changes in retail habits – Tesco, Sainsbury’s, Morrisons, etc are closing some stores, with no major large stores planned. Banks and other financial institutions are still closing some branches, so changes in town centres still have some way to go – but none of these changes are recognised in the draft Local Plan, which envisages no limit to traditional retail.

There is another reason why the retail sector is unlikely to exhibit long term growth, and this is consumer debt, which has reached a level that the Bank of England have said could contribute to economic stability. This is likely to have a greater destabilising effect in the event of an economic downturn – and there will certainly be at least two of these during the life of the Local Plan. Retail spending simply cannot be maintained indefinitely at its current rate, and to plan for a large increase in consumer spending is irresponsible.

So there has to be a reappraisal of the urban development plans, with more homes provided in urban areas, in particular in the centre of Guildford, before there is any consideration of building outside the urban area. These are not separate policies to be considered separately, but hang together as part of a holistic plan. As the council own many sites in the centre, these could be made available for development within the first 5 years of the plan, with mixed housing on these sites, including new social housing, which is sorely needed. Affordable housing is simply not affordable to anyone on the minimum wage, there is a need for a considerable expansion of social housing, a need that is not adequately recognised in the draft Local Plan.

In the detail of Policy D4, it suggests that in urban areas and inset villages planning permission will be granted provided that a proposed development:

- “Ensures that the layout, scale, form, massing, height of buildings and structures, and materials relate to the site context and its surroundings;”.....

There are several other criteria listed and the Policy then goes on to elaborate criteria specific to inset villages, as follows:
“In addition to the above, proposals for new development within inset village areas will have particular regard to:

- The distinctive settlement pattern of the village and the important relationship between the built development and the surrounding landscape;
- Important views of the village from the surrounding landscape;
- Views within the village of local landmarks.”

There are numerous development sites proposed that mean that the first criterion cannot be met, as the developments proposed do not relate to the scale, form or massing of the site surroundings. For example, in West Horsley and East Horsley, there are number of sites where this does not apply. It is proposed that a total of 3.6 km² should be removed from the green belt, with a total of 533 houses proposed on sites in East and West Horsley on a total of 29.1 ha, an average density of 18 dwellings/ha. These proposed developments are not in scale or proportion to the existing villages, and the housing density is considerably higher than existing housing density. Effectively, if these developments were to proceed, East and West Horsley would merge and become a large urban area in the green belt, totally different in character to the existing villages, with the existing settlement pattern completely lost. Similar considerations apply to other proposed development sites, such as Flexford and Normandy. In this case, 1.3 km² would be removed from the green belt and a total of 1100 dwellings proposed on 67 ha, with an average density of 16.4 dwellings/ha. Again, the scale and form would overwhelm existing hamlets and villages, merging these to form another urban area in the heart of the green belt, with no consideration of the views of the settlements from the surrounding countryside, much of which has been given AONB status.

Thus the words of the policy statement D4 do not match the proposals contained in the draft local plan.

The “Reasoned Justification” for the policy consists of five paragraphs, 4.5.48 to 4.5.52. Of these, 4.5.48 and 4.5.49, 4.5.51 and 4.5.52 are not justifications for the policy, they are simply statements or further information. Paragraph 4.5.50 is the only attempted justification for this policy, but in fact this applies only to insetting. Paragraph 4.5.50 is factually wrong and so the justification for this policy does not bear close examination. Parts of this paragraph are taken in turn below, to show the inaccuracies this paragraph contains.

“Historically, development has been focused in the urban areas of Guildford, and Ash and Tongham only. Development in the villages has been very limited due to the Green Belt designation which previously washed over all but one of the villages.”

This depends on how development is measured. In terms of raw numbers, this may be true, but this would ignore the fact that urban area of Guildford town contains much of the housing in the borough. Taking the increase in housing stock between the censuses of 2001 and 2011 in a specific wards reveals a much more complex picture. The village and ward of Effingham, for example, had a higher rate of adding dwellings than the average for the borough and for at least some of the Guildford urban wards. Using census data collected by the ONS, between 2001 and 2011, the number of dwellings in Effingham increased by 6.6%, whereas for the borough as a whole it increased by 5.0%. Over the same period in Merrow, a ward within the urban area of Guildford, the number of dwellings increased by only 1.2%, whilst in Normandy ward the increase was 2.6%. This analysis has not been exhaustive, but it is sufficient to show that the opening statement in paragraph 4.5.47 is incorrect, and that in some cases, proportionally, considerably more development has occurred in green belt villages. It must be incumbent on GBC to assess the facts before making false statements such as this. Opinions are not facts. ONS statistics are open to all.

In the first three months of 2016, planning applications for 11 additional dwellings in Effingham have been made, in a village of approximately 525 dwellings. One of these applications has been reduced from 6 to 4 dwellings, whilst the other 5 have been approved. This shows clearly that development within villages washed over by the green belt can occur, and that organic growth is possible. There is no necessity for insetting.

“Fifteen villages are now inset from the Green Belt meaning that development is no longer, by definition, considered inappropriate”.

Guildford’s Green Belt boundaries were established in the Guildford Borough Local Plan 1987, so are well established. There has not been any justification for the extensive green belt review that accompanies the insetting of villages, or for
the removal of these villages from the green belt. According to the NPPF, paragraph 83, green belt boundary changes should be made only in exceptional circumstances, as follows

“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.”

No exceptional circumstances have been demonstrated, with none given as justification in Policy D4 for the policy of insetting. Proposed green belt boundary changes are on a very large scale, as it is proposed to remove more than 6% of the existing area designated as green belt, and to create new green belt boundaries extending to more than 105 km. This is not a simple revision to the green belt, and a demonstration of exceptional circumstances is required for each change. This has not been done, not for a single proposed change.

Although Guildford Borough Council are in the process of producing a new Local Plan, this in itself is not enough to change Green Belt boundaries; the requirement to demonstrate exceptional circumstances still applies. According to a High Court judgement, Gallagher vs Solihull, issued March 30th, 2014, Case No. CO/17668/2013, there is still a requirement to prove exceptional circumstances – quotations below are from paragraph 125 of this judgement:

“However, it is not arguable that the mere process of preparing a new local plan could itself be regarded as an exceptional circumstance justifying an alteration to a Green Belt boundary. National guidance has always dealt with revisions of the Green Belt in the context of reviews of local plans…… and has always required “exceptional circumstances” to justify a revision. The NPPF makes no change to this.”

“No changes that would warrant an alteration to green belt boundaries have been demonstrated by GBC, their so called “sensitivity analysis” is shallow and subjective, and changes that may have occurred since the boundary was established was discussed. The changes proposed do not meet the standards set in this judgement. Instead, GBC maintain that it is housing need that creates blanket exceptional circumstances for changes proposed to the green belt. However, this is not the case. Following a meeting with local councillors and MPs in early 2014, Nick Boles wrote to Anne Milton MP to clarify the issue of exceptional circumstances and in this letter said:
“The written Ministerial Statement of 1 July 2013 set out the Government’s concern that some recent planning decisions have not accorded the Green Belt the level of protection that was the explicit policy intent of Ministers. It made clear that the single issue of unmet need – whether for conventional housing or for travellers sites – 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.”

These quotations show that the insetting process has considerable hurdles to overcome, including as it does the revision to Green Belt boundaries that accompanies insetting. Thus the most important questions are – did the flawed Pegasus “Guildford Borough Green belt and Countryside Study” show unequivocally that villages to be inset are not open villages, making no or a minimal contribution to the openness of the Green Belt; and that there were exceptional circumstances (other than unmet housing need) that justify a change to the Green Belt, creating a new boundary around all these villages – more than 105 km of new boundary? The Pegasus study did not do this, and this was just one of its many flaws (cf Annexe XX)

As shown above, development has occurred within villages, and the NPPF made it easier for additional development to take place within the green belt, via the provisions of paragraph 89, which specifically makes it easier for limited infill to occur and on a larger scale, for affordable housing to be built within villages washed over by the green belt. These provisions came into effect in 2012, when the NPPF was adopted and so the rate of increase in housing within villages is very likely to increase beyond that observed in the period between the 2001 and 2011 censuses.

It is clear from the most recent figures for planning applications to GBC in 2016 in Effingham that the pace of development within villages is changing, even with continued green belt protection. There is no requirement for insetting villages within the green belt, and the desire to increase development within the villages is not an adequate basis for insetting.

The final part of paragraph 4.5.47 is

“In accordance with national policy, the important character of these inset villages should instead be protected using other development management policies”.

This is not national policy, national planning policy is provided by the NPPF, and paragraph 86 of the NPPF is the relevant paragraph, 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, 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.”

There is thus no national policy that requires insetting. Instead, a judgement should be made for each village based on its contribution to the openness of the green belt. In fact, many of the villages proposed for insetting exhibit an open pattern of development, and so make an important contribution to the openness of the green belt, for example, Effingham. This has not been considered, other than in the flawed Pegasus report, and the examination of their approach reveals how this analysis was flawed. No further consideration has been given by GBC, and so GBC’s policy of wholesale insetting does not accord with national policy, as claimed.

In itself, there are many issues with insetting, and these include:

- According to the previous draft of the Local Plan, subject to the Regulation 18 consultation during summer 2014, insetting is based largely on the findings of the Pegasus study, “Guildford Borough Green Belt and Countryside Study. This report was very poor and various parts of the study criticised by many, including some borough councillors. It is perverse to continue with any recommendations of this study. In particular, a detailed review of this report for Effingham village showed that it was inaccurate and subjective.
- The settlement hierarchy was also subject to a detailed review and again this showed that scoring methods used were inaccurate and subjective.
Boundary changes are arbitrary, without an adequate detailed survey. There are no checks and balances to this, even though the positioning of the line can change the price of an acre of land from about £15,000 to over £1 million. There is no process to it, simply someone using a computer and a mouse – literally a mouse click can turn some land owners into millionaires. In some cases, the proposed boundary divides semi-detached houses, so that one is still inside the green belt and the other outside. In other cases, the boundary divides gardens, so that part of a garden is in, part out of the green belt. Due care and attention has not been given to producing proposed boundaries.

In many cases, boundaries proposed do not comply with the requirements of the NPPF, which is given in the NPPF, paragraph 85, final bullet point, which states

“define boundaries clearly, using physical features that are readily recognisable and likely to be permanent”.

Given this NPPF definition, treelines, hedgerows, woodlands, etc should not be considered as potential Green Belt boundaries. In fact, in some cases proposed boundaries cross open fields, with no discernible features whatsoever. These are entirely inappropriate as a green belt boundary.

It should also be noted that GBC implicitly recognise that insetting is likely to lead to more development within villages on sites that are not identified in the draft Local Plan. But there is no recognition of this in the housing target. As is noted, insetting would mean that the rate of windfall development would increase, but GBC have not provided a proper analysis of windfall development (such as that provided by Mole Valley District Council) and they have failed to recognise a higher rate of windfall development in showing how the housing target will be met – even though, via Policy D4, they are planning for it. Windfalls should be deducted from the housing target, and the need for additional sites would thus be substantially reduced. Windfall development should be properly assessed and identified within the housing target, with an appropriate increase in the rate of windfalls in any villages that are inset.

THE BROWNFIELD OPPORTUNITY

Yes, we need a new Local Plan for our borough in order to provide a development strategy within which we can accommodate our local housing, economic and environmental needs. But first we must make 100% use of our urban brownfield before we consider building in the Green Belt or countryside. Paragraph 80 of the NPPF clearly states that Green Belt serves a key purpose, “to assist in urban regeneration, by encouraging the recycling of derelict land and other urban land”. In order to comply with central planning policy we need a brownfield strategy that states clearly. “We are committed to a brownfield first initiative whereby all applications on previously developed land are given fast track priority and every facility to promote development for residential purposes and employment purposes in order to satisfy the needs of local people. In parallel a zero CIL incentive should be given for all residential development on brownfield land. In response to the detailed objections received in the Regulation 18 process of the 2014 Local Plan and also in accordance with government policy a Guildford brownfield land register should be urgently compiled showing address, ownership, occupier, current use and detailed planning brief. A head of brownfield should be appointed at GBC with a clear briefing to deliver brownfield targets of housing and employment space.

GBC needs to accelerate the residential redevelopment at Woodbridge Meadows, Walnut Tree Close and the Station within the next 5 years. GBC needs to examine the residential development opportunity of the 25.7 acres of car parks in GBC ownership. We do not consider that the target of 1,172 homes in the town centre takes account of the need and demand for housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town which will in itself help to sustain the retail core by increased economic impact. The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015 which has recently been adopted by GBC. The reality is that the Town Centre has the capacity for at least 5,000 homes. The additional target capacity of 5,000 could easily be provided within the following urban sites which have the capacity for 7,500 homes:

- 2,500 homes detailed in Masterplan 2015 including Woodbridge Meadows which can itself be increased substantially
- 500 homes at North Street
- 1000 homes on current GBC car parks (25 acres) and at the station
- 1000 homes saved in the urban area if 100% of students are accommodated on Surrey University campus (17 ha of car parks)
- 1000 homes at Slyfield on the 40 ha regeneration site
- 1000 windfall infill (50 per annum)
- 500 homes on brownfield sites in villages on sites of max. 1ha which do not impact Green Belt
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/5248  **Respondent:** 8655233 / Kay Mackay  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY D4

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/5053  **Respondent:** 8667713 / Victoria Sinnett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

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:** PSLPP16/2323  **Respondent:** 8671969 / Valerie Thompson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

D4 Development in urban areas and inset villages

See my comments under P2 and H1/H2

I object to any policy which proposes greenfield development over brownfield sites.

I OBJECT in the strongest terms for any Villages to be “inset”.

The need is for more truly affordable homes not mansions in the countryside, which is what will happen under GBC’s control.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15204  Respondent: 8672993 / Kes Heffer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The weak provisions of this policy for development within villages that have been ‘inset’ from the Green Belt by the proposals elsewhere in this draft Local Plan imply that the density of housing within the villages will inexorably increase over time, through a ratchet effect, destroying their rural character. The wording that supposedly protects such character against inappropriate development is extremely vague and weak, and needs strengthening.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1548  Respondent: 8687041 / Michael Aaronson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

I OBJECT to the fact that the same Policy is made to apply to the urban areas and the inset villages. The factors relating to the latter are quite distinctive and they merit their own Policy. I have no confidence that the three points relating specifically to the villages will be respected in practice, and I offer in evidence the proposals for Policy/Site A46, which show zero respect for the distinctive settlement pattern of the villages of Normandy and Flexford, nor for the views of the villages from the surrounding landscape, nor for the views within the villages of local landmarks, both natural and man-made.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1086  Respondent: 8687265 / Dagero Ltd (David Roberts)  Agent:

Document page number 1962
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**POLICY D4 - Development in urban areas and inset villages**

I OBJECT. This is a piously aspirational policy that does not address any of the obvious practical issues already touched on above:

- The plan envisages that 40% of homes built will be “affordable”, but this does not provide any accommodation for low-paid workers, for example, those on the minimum wage, who cannot afford to buy so-called “affordable” homes or pay an “affordable” rent. There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low-paid workers such as those employed in the retail, warehousing and distribution sectors (all of which this plan aspires to expand).
- The number of homes planned in the urban area is too low. There is a glaring need for regeneration in many urban areas, but this is ignored in favour building homes on green-field sites instead. This will not address urban housing needs. It is also unsustainable, since building outside the town does disproportionate harm to road traffic, air quality and overstretched infrastructure.
- The plan envisages a large expansion of the traditional “bricks and mortar” retail sector, but this is a sector in rapid and continuous decline.
- All the stated policy aims for “inset” villages will be negated by the excessive weight of new housing development proposed which would radically change their character forever. Against this disruptive background, it is barely relevant to talk about preserving views!

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID: PSLPP16/2638  Respondent: 8693153 / Vicki Willetts  Agent:**

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY D4 (DEVELOPMENT IN URBAN AREAS AND INSET VILLAGES) • No commitment to expand social housing or accommodation for people who can’t afford so-called affordable homes. • Not enough new homes in urban areas, despite demand and need for urban regeneration and protection of Green Belt. • Objectives for inset villages cancelled out by plans for excessive housing growth there. • Too much emphasis on traditional shops, when a lot of this sector is in terminal decline.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID: PSLPP16/8890  Respondent: 8694369 / Nicola Ogilvie Smals  Agent:**

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )
Development should be commensurate to the size, character and function of existing settlements. Allocating a 100% increase in homes to West Horsley North is in no way commensurate to the size, character and function of this village. The local plan references the rich and varied mix of settlements and interspersed development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/114  Respondent: 8699809 / Holmwood Close Residents Association (Liz Drew)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

The move to allow increased development in villages previously protected by the greenbelt will substantially affect the look and feel of these villages and put unacceptable strain on already overstretched infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15035  Respondent: 8708545 / Nigel Wicks  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4509  Respondent: 8709249 / Geoff Spink  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

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The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4737  Respondent: 8711841 / Rosmarie Roberts-Kunz  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY D4 (DEVELOPMENT IN URBAN AREAS AND INSET VILLAGES)

- No commitment to expand social housing or accommodation for people who can’t afford so-called affordable homes.
- Not enough new homes in urban areas, despite demand and need for urban regeneration and protection of Green Belt.
- Objectives for inset villages cancelled out by plans for excessive housing growth there.
- Too much emphasis on traditional shops, when a lot of this sector is in terminal decline.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11643  Respondent: 8721857 / Andrea Lightfoot  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The plan envisages that 40% of homes built will be “affordable”, but this does not provide any accommodation for low-paid workers, for example, those on the minimum wage, who cannot afford to buy so-called “affordable” homes or pay an “affordable” rent. There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low-paid workers such as those employed in the retail etc.

The number of homes planned in the urban area is too low. There is a need for regeneration in many urban areas, but this is ignored in favour building homes on green-field sites instead. This will not address urban housing needs. It is also unsustainable, since building outside the town does disproportionate harm to road traffic, air quality and overstretched infrastructure.

All the stated policy aims for “inset” villages will be negated by the excessive weight of new housing development proposed which would radically change their character forever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9071  Respondent: 8723809 / Sally Blake  Agent:
I object to POLICY D4 - Development in urban areas and inset villages

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- Not enough new homes in urban areas, despite demand and need for urban regeneration and protection of Green Belt.
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- Too much emphasis on traditional shops, when a lot of this sector is in terminal decline.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3237  Respondent: 8726529 / Eric Palmer  Agent:

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 Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16892  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 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:

Comment ID: PSLPP16/6711  Respondent: 8731649 / Ian Slater  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13936  Respondent: 8732993 / Michael Weber  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

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: PSLPP16/15829  Respondent: 8732993 / Michael Weber  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12966  Respondent: 8735873 / David and Gillian Allan  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4
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: PSLPP16/9346  Respondent: 8744417 / Mark & Gillie Hammersley  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4
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<td>The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.</td>
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<td>9. Policy D4: I object to the insetting of villages (meaning in fact, removal of villages from Green Belt protections) and the fact that they will suffer from higher density development and the resulting increase in traffic, increased use of infrastructure which is already under pressure. I object in particular to the insetting of West Clandon, Send and the Horsleys. This will have a detrimental impact on Green Belt openness and the views in and out of the AONB in direct contravention of Policy P1 and P2.</td>
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I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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There has also been a relentless amount of infilling and house extension work. In particular, many bungalows and small houses have been torn down to make way for large houses. This should never have been permitted because older people end up living in large under-occupied houses or are being forced out of the area completely and this affects the character of the 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 Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2366  Respondent: 8806305 / Laurence Cook  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY D4 - Development in urban areas and inset villages

I OBJECT. This does not address any of the obvious practical issues already touched on above:

• The plan envisages that 40% of homes built will be “affordable”, but this does not provide any accommodation for low-paid workers, for example, those on the minimum wage, who cannot afford to buy so-called “affordable” homes or pay an “affordable” rent. There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low-paid workers such as those employed in the retail, warehousing and distribution sectors (all of which this plan aspires to expand).
• The number of homes planned in the urban area is too low. There is a glaring need for regeneration in many urban areas, but this is ignored in favour building homes on green-field sites instead. This will not address urban housing needs. It is also unsustainable, since building outside the town does disproportionate harm to road traffic, air quality and overstretched infrastructure.
• The plan envisages a large expansion of the traditional “bricks and mortar” retail sector, but this is a sector in rapid and continuous decline.
• All the stated policy aims for “inset” villages will be negated by the excessive weight of new housing development proposed which would radically change their character forever. Against this disruptive background, it is barely relevant to talk about preserving views!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13476  Respondent: 8806849 / Roland McKinney  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Submission Summary

There are effectively two separate parts to this policy, both are flawed, and in the case of insetting, fatally flawed. In the case of urban development there are numerous flaws, including:

• The plan envisages a large expansion of the traditional “bricks and mortar” retail sector, but this is a sector in long term decline, and so is not sustainable even in the medium term.
• The plan envisages that 40% of homes built will be affordable, but these will not provide appropriate accommodation for low paid workers, for example, those on the minimum wage, who cannot afford to buy “affordable” homes, nor can they pay so-called “affordable” rent. There is a great need for an expansion in
social housing, especially in urban areas, where there is a greater concentration of low paid workers such as those employed in the retail, warehousing and distribution sectors.

- The number of homes planned in the urban area is too low – there is a need for regeneration in some areas of Guildford, but this is ignored and instead the plan concentrates on building homes on greenfield sites, which does not meet the needs for housing within the town, especially within the centre. This is not a sustainable policy as building outside the town has a disproportionate effect on road traffic. The analysis in Annexe 1 shows this to be the case when alternative methods of travel to work are analysed for two separate areas, one in the town centre and the second in a rural village.

   In the case of setting, the policy is fatally flawed, for three separate reasons.

   - Firstly, it is based on an erroneous assumption. GBC justify the policy (in para 4.5.47) by suggesting, without any supporting data, that development in villages washed over by the green belt has been at a lower rate than within Guildford town. This was not the case, and statistics from the ONS censuses of 2001 and 2011 show that this assumption is incorrect. These statistics show that the growth rate in housing was higher in Effingham, a village washed over by the green belt, than in Merrow, which is not washed over by the green belt. In fact, the rate of increase in housing stock in Effingham was faster than the average for the borough.

   - Secondly, setting has been based on the Green Belt and Countryside Study, but the analysis in this document was flawed to the extent that it is valueless. It has serious flaws in its methodology, includes subjective judgements, and thus its conclusions are flawed - see Annexe 2 for detailed analysis. These flaws are so serious that this study should be removed from the evidence base that supports the Local Plan.

   - Finally, although a flawed justification was provided for the setting of villages, this does not apply to all the areas selected for setting, many of which are not “villages”, such as Pirbright Barracks. These sites are listed in the text below. No attempt has been made to justify the setting of these sites, and in the absence of any justification they should remain in the Green Belt.

**Urban development**

There is a fundamental flaw in the draft Local Plan, in that there are not enough dwellings planned in urban areas, in particular, Guildford town centre. This is where the demand for affordable homes is most acute, a fact which is recognised in much of the draft Local Plan. Yet the plan then envisages that most dwellings will be built outside the urban area, so there is no continuity in the plan – if the demand for affordable homes is most acute within the town, then is where these dwellings should be built. There are sites available, for example, various sites in Woodbridge Meadows, Walnut Tree Close (including the area around the station) and North Street. Yet the focus in these areas is to provide a very limited number of dwellings, with the emphasis on additional retail space and more commercial premises. Given the profound changes in traditional retail, this is not a sustainable policy. There have been many examples of bankruptcies amongst traditional retailers, the most recent examples being BHS and Austin Reed, and previously Woolworths, Comet, etc. The British Retail Consortium forecast that by 2025 up to one third of those now employed in traditional retail could lose their jobs, due to a combination of factors. These included the continuation of the move to shopping via the internet and higher costs, from business rates and the introduction of the “living” wage. Recent figures show that online sales are still growing quickly, with more than 13% of total retail sales now made over the internet. Nor does an expansion in traditional retail chime with the objective of attracting highly paid jobs to the area – the majority of jobs in retail are low paid, and zero hours contracts are common. So any expansion in traditional bricks and mortar retail would create a greater demand for affordable and social housing – exactly the reverse of what is needed.

Even the major grocery retail chains have been affected by changes in retail habits – Tesco, Sainsburys, Morrisons, etc are closing some stores, with no major large stores planned. Banks and other financial institutions are still closing some branches, so changes in town centres still have some way to go – but none of these changes are recognised in the draft Local Plan, which envisages no limit to traditional retail.

There is another reason why the retail sector is unlikely to exhibit strong long term growth, and this is consumer debt, which has reached a level that the Bank of England has said could contribute to economic stability. This is likely to have a greater destabilising effect in the event of an economic downturn – and there will certainly be at least two of these during the life of the Local Plan. Consumer spending simply cannot be maintained indefinitely at its current rate, and to plan for a large increase is irresponsible.

Building the majority of homes outside urban areas is contrary to the advice of planners such as Lord Rogers, who has detailed the many advantages of increasing housing density in urban areas. The housing policy in this plan will result in a greater number of commuter journeys, creating more congestion, with an increase in air pollution across the borough.
This is examined in detail in Annexe 1.
So there has to be a reappraisal of urban development plans, with more homes provided in urban areas, in particular in the
centre of Guildford. As the council own many sites in the centre, these could be made available for development within
the first 5 years of the plan, with mixed housing on these sites, including new social housing, which is sorely needed.
Affordable housing is simply not affordable to anyone on the minimum wage, there is a need for a considerable
expansion of social housing, a need that is not adequately recognised in the draft Local Plan.
In the detail of Policy D4, it is suggested that in urban areas and inset villages, planning permission will be granted
provided that a proposed development:

• “Ensures that the layout, scale, form, massing, height of buildings and structures, and materials relate to the site
context and its surroundings;”…..
  There are several other criteria listed and the Policy then goes on to elaborate criteria specific to inset villages, as
  follows:
  “In addition to the above, proposals for new development within inset village areas will have particular regard
to:
• The distinctive settlement pattern of the village and the important relationship between the built development
  and the surrounding landscape;
• Important views of the village from the surrounding landscape;
• Views within the village of local landmarks.”

There are numerous development sites proposed that mean that the first criterion cannot be met, as the developments
proposed do not relate to the scale, form or massing of the site surroundings. For example, the Horsleys. Here it is
proposed that a total of 3.6 km² should be removed from the green belt, with a total of 533 houses proposed on sites in
East and West Horsley on a total of 29.1 ha, an average density of 18 dwellings/ha. These proposed developments are not
in scale or proportion to the existing villages, and the housing density is considerably higher than existing housing
density. Effectively, if these developments were to proceed, East and West Horsley would merge and become a large
urban area in the green belt, totally different in character to the existing villages, with the existing settlement pattern
completely lost. Similar considerations apply to other proposed development sites, such as Flexford and Normandy. In
this case, 1.3 km² would be removed from the green belt with a total of 1,100 dwellings proposed on 67 ha, an average
density of 16.4 dwellings/ha. Again, the scale and form of new development would overwhelm existing hamlets and
villages, merging these to form another urban area in the heart of the green belt, with no consideration of the views of the
settlements from the surrounding countryside, much of which has been given AONB status.
Thus the words of the policy statement D4 do not match the proposals contained in the draft local plan.
The “Reasoned Justification” for the policy consists of five paragraphs, 4.5.45 to 4.5.49. Of these, 4.5.45 and 4.5.46,
4.5.48 and 4.5.49 are not justifications for the policy, they are simply statements or further information. Paragraph 4.5.47
is the only attempted justification for this policy, but in fact this applies only to insetting. Paragraph 4.5.47 is factually
wrong and so the justification for this policy does not bear close examination. Parts of this paragraph are taken in turn
below, to show the inaccuracies this paragraph contains.

“Historically, development has been focused in the urban areas of Guildford, and Ash and Tongham only. Development
in the villages has been very limited due to the Green Belt designation which previously washed over all but one of the
villages.”
This depends on how development is measured. In terms of raw numbers, this may be true, but this would ignore the fact
that urban area of Guildford town contains much of the housing in the borough. Taking the increase in housing stock
between the censuses of 2001 and 2011 in specific wards reveals a much more complex picture. Effingham, for example,
had a higher rate of adding dwellings than the average for the borough and some of Guildford’s urban wards. Using
census data collected by the ONS, between 2001 and 2011, the number of dwellings in Effingham increased by 6.6%,
whereas for the borough as a whole it increased by 5.0%. Over the same period in Merrow, a ward within the urban area
of Guildford, the number of dwellings increased by only 1.2%, whilst in Normandy ward the increase was 2.6%. This
analysis has not been exhaustive, but it is sufficient to show that the opening statement in paragraph 4.5.47 is incorrect,
and that in some cases, proportionally, considerable development has occurred in green belt villages. It should be
incumbent on GBC to assess the facts before making inaccurate statements such as this. ONS statistics are open to all.
In the first three months of 2016, planning applications for 12 additional dwellings in Effingham have been made, in a
village of approximately 525 dwellings. Although one of these applications has been reduced from 6 to 4 dwellings,
another 5 have been approved which shows clearly that development within villages washed over by the green belt can
occur, and that organic growth is possible. There is no necessity for insetting.

“Fifteen villages are now inset from the Green Belt meaning that development is no longer, by definition, considered inappropriate”.

Guildford’s Green Belt boundaries were established in the Guildford Borough Local Plan 1987, so are well established. There has not been any justification for the extensive green belt review that accompanies the insetting of villages, or for the removal of these villages from the green belt. According to the NPPF, paragraph 83, green belt boundary changes should be made only in exceptional circumstances, as follows

“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.”

No exceptional circumstances have been demonstrated, with none given as justification in Policy D4 for the policy of insetting. Proposed green belt boundary changes are on a very large scale, as it is proposed to remove 14.4 km2 from the Green Belt, more than 6% of the existing area designated as green belt, and to create new green belt boundaries extending to more than 105 km. This is not a simple revision to the Green Belt, and a demonstration of exceptional circumstances is required for each and every change. This has not been done, not for a single proposed change.

Although Guildford Borough Council are in the process of producing a new Local Plan, this in itself is not enough to change Green Belt boundaries; the requirement to demonstrate exceptional circumstances still applies. According to a High Court judgement, Gallagher vs Solihull, issued March 30th, 2014, Case No. CO/17668/2013, there is still a requirement to prove exceptional circumstances – quotations below are from paragraph 125 of this judgement:

“However, it is not arguable that the mere process of preparing a new local plan could itself be regarded as an exceptional circumstance justifying an alteration to a Green Belt boundary. National guidance has always dealt with revisions of the Green Belt in the context of reviews of local plans…… and has always required “exceptional circumstances” to justify a revision. The NPPF makes no change to this.”

“Exceptional circumstances are required for any revision of the boundary, whether the proposal is to extend or diminish the Green Belt.”

Whilst each case is fact-sensitive and the question of whether circumstances are exceptional for these purposes requires an exercise of planning judgment, what is capable of amounting to exceptional circumstances is a matter of law, and a plan-maker may err in law if he fails to adopt a lawful approach to exceptional circumstances. Once a Green Belt has been established and approved, it requires more than general planning concepts to justify an alteration.”

Each and every proposed change to the green belt boundary requires that exceptional circumstances be demonstrated, otherwise the changes are not lawful. This has not been done by GBC, not for any proposed change.

From paragraph 130 of this judgement

“In other words, something must have occurred subsequent to the definition of the Green Belt boundary that justifies a change. The fact that, after the definition of the Green Belt boundary, the local authority or an inspector may form a different view on where the boundary should lie, however cogent that view on planning grounds, that cannot of itself constitute an exceptional circumstance which necessitates and therefore justifies a change.”

“…..That, in his judgment, may now be so: but that falls very far short of the stringent test for exceptional circumstances that any revision of the Green Belt boundary must satisfy. There is nothing in this case that suggests that any of the assumptions upon which the Green Belt boundary was set has proved unfounded, nor has anything occurred since the Green Belt boundary was set that might justify the redefinition of the boundary.”

No changes that would warrant an alteration to green belt boundaries have been demonstrated by GBC, their so called “sensitivity analysis” was shallow and subjective, and no changes that may have occurred since the boundary was established were discussed. The changes proposed do not meet the standards set in this judgement. Instead, GBC maintain that it is housing need that creates blanket exceptional circumstances for changes proposed to the green belt. However, this is not the case. Following a meeting with local councillors and MPs in early 2014, Nick Boles wrote to Anne Milton MP to clarify the issue of exceptional circumstances and in this letter said:

“The written Ministerial Statement of 1 July 2013 set out the Government’s concern that some recent planning decisions have not accorded the Green Belt the level of protection that was the explicit policy intent of Ministers. It made clear that the single issue of unmet need – whether for conventional housing or for travellers sites – 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.”

This was reaffirmed more recently in a letter from Brandon Lewis to all English MPs, dated 07/06/2016. In this letter,
Brandon Lewis said

“The Government has put in place the strongest protection for the Green Belt. 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 where very special circumstances exist, through the Local Plan process and with the support of local people. We have been repeatedly clear that demand for housing alone will not change Green Belt boundaries.”

These quotations show that the insetting process has considerable hurdles to overcome, including as it does the revision to Green Belt boundaries that accompanies insetting. Thus the most important questions are – did the flawed Pegasus “Guildford Borough Green Belt and Countryside Study” show unequivocally that villages to be inset are not open villages, making no or a minimal contribution to the openness of the Green Belt; and that there were exceptional circumstances (other than unmet housing need) that justify a change to the Green Belt, creating a new boundary around all these villages – more than 105 km of new boundary? The Pegasus study did not do this, and this was just one of its many flaws. Some of these flaws are discussed in detail in Annexe 2.

As shown above, development has occurred within villages, and the NPPF made it easier for additional development to take place within the green belt, via the provisions of paragraph 89, which specifically makes it easier for limited infill to occur and on a larger scale, for affordable housing to be built within villages washed over by the Green Belt. These provisions came into effect in 2012 when the NPPF was adopted and so the rate of increase in housing within villages is very likely to increase beyond that observed in the period between the 2001 and 2011 censuses.

It is clear from the most recent figures for planning applications to GBC in 2016 in Effingham that the pace of development within villages is changing, even with continued green belt protection. There is no requirement for insetting villages within the green belt, and a desire to increase development within the villages is not an adequate basis for changing green belt boundaries to permit insetting.

The final part of paragraph 4.5.47 is

“In accordance with national policy, the important character of these inset villages should instead be protected using other development management policies”.

This is not national policy, national planning policy is provided by the NPPF, and paragraph 86 of the NPPF is the relevant paragraph, 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, 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.”

There is thus no national policy that requires insetting. Instead, a judgement should be made for each village based on whether the village is open, and if it makes a contribution to the openness of the Green Belt. In fact, many of the villages proposed for insetting exhibit an open pattern of development, and make an important contribution to the openness of the green belt, for example, Effingham. This has not been considered, other than in the flawed Pegasus report, and the examination of their approach included in Annexe 2 reveals how this analysis was flawed. No further consideration has been given by GBC to insetting, and so GBC’s policy of wholesale insetting does not accord with a national policy, real or imagined, as claimed.

In itself, there are many issues with insetting, and these include:

- According to the draft Local Plan, insetting is based largely on the findings of the Pegasus study, “Guildford Borough Green Belt and Countryside Study. This report was very poor and various parts of the study criticised by many, including some borough councillors. It is perverse to continue with any recommendations of this study. In particular, a detailed review of this report for Effingham village showed that it was inaccurate and subjective. This review is attached as Annexe 2.
- The settlement hierarchy was also subject to a detailed review and again this showed that scoring methods used were inaccurate and subjective.
- Proposed boundary changes are arbitrary, without an adequate detailed survey. There are no checks and balances to this, even though the positioning of the boundary line can change the price of an acre of land from about £15,000 to over £1 million. There is no process to it, simply someone using a computer and a mouse – literally a mouse click can turn some land owners into millionaires. In some cases, the proposed boundary divides semi-detached houses, so that one is still inside the green belt and the other outside. In other cases, the boundary divides gardens, so that part of a garden is in, part out of the green belt. Due care and attention has not been given to producing proposed boundaries.
- In many cases, boundaries proposed do not comply with the requirements of the NPPF, which is given in the NPPF, paragraph 85, final bullet point, which states “define boundaries clearly, using physical features that are readily recognisable and likely to be permanent”. 

...
Given this NPPF definition, treelines, hedgerows, woodlands, etc should not be considered as potential Green Belt boundaries. In fact, in some cases proposed boundaries cross open fields, with no discernible features whatsoever. These are entirely inappropriate as a green belt boundary. The boundary proposed for Effingham village is reviewed in Annexe 3.

It should also be noted that GBC implicitly recognise that insetting is likely to lead to more development within villages on sites that are not identified in the draft Local Plan. But there is no recognition of this in the housing target. As is noted, insetting would mean that the rate of windfall development would increase, but GBC have not provided a proper analysis of windfall development (such as that provided by Mole Valley District Council) and they have failed to recognise a higher rate of windfall development in showing how the housing target will be met – even though, via Policy D4, they are planning for it. Windfalls should be deducted from the housing target, and the need for additional sites would thus be substantially reduced. Windfall development should be properly assessed and identified within the housing target, with an appropriate increase in the rate of windfalls in any villages that are inset.

Although a flawed justification was provided for the insetting of villages, this does not apply to all the areas selected for insetting, many of which are not “villages”. Some of these are adjacent to an Area of Outstanding Natural beauty (AONB) and in at least one case some areas of AONB have been included in the inset area. These areas include:
- HM Prison, Ripley Road, Send
- Keogh Barracks
- Pirbright Barracks (small areas of AONB included in inset area)
- Pirbright Institute
- Henley Business Park
- Garlick Arch

No attempt has been made to justify the insetting of these sites. In the absence of any attempt at justification there is no reason to inset these areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I OBJECT to this policy.

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- The plan envisages a large expansion of the traditional “bricks and mortar” retail sector, but this is a sector in long term decline, and so is not sustainable even in the medium term.
- The plan envisages that 40% of homes built will be affordable, but these will not provide appropriate accommodation for low paid workers, for example, those on the minimum wage, who cannot afford to buy “affordable” homes, nor can they pay so-called “affordable” rent. There is a great need for an expansion in social housing, especially in urban areas, where there is a greater concentration of low paid workers such as those employed in the retail, warehousing and distribution sectors.
- The number of homes planned in the urban area is too low – there is a need for regeneration in some areas of Guildford, but this is ignored and instead the plan concentrates on building homes on greenfield sites, which does not meet the needs for housing within the town, especially within the centre. This is not a sustainable policy as building outside the town has a disproportionate effect on road traffic. The analysis in Annexe 1 shows this to
be the case when alternative methods of travel to work are analysed for two separate areas, one in the town centre and the second in a rural village.

In the case of insetting, the policy is fatally flawed, for three separate reasons.

• Firstly, it is based on an erroneous assumption. GBC justify the policy (in para 4.5.47) by suggesting, without any supporting data, that development in villages washed over by the green belt has been at a lower rate than within Guildford town. This was not the case, and statistics from the ONS censuses of 2001 and 2011 show that this assumption is incorrect. These statistics show that the growth rate in housing was higher in Effingham, a village washed over by the green belt, than in Merrow, which is not washed over by the green belt. In fact, the rate of increase in housing stock in Effingham was faster than the average for the borough.

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• Finally, although a flawed justification was provided for the insetting of villages, this does not apply to all the areas selected for insetting, many of which are not “villages”, such as Pirbright Barracks. These sites are listed in the text below. No attempt has been made to justify the insetting of these sites, and in the absence of any justification they should remain in the Green Belt.

**Urban development**

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There is another reason why the retail sector is unlikely to exhibit strong long term growth, and this is consumer debt, which has reached a level that the Bank of England has said could contribute to economic stability. This is likely to have a greater destabilising effect in the event of an economic downturn – and there will certainly be at least two of these during the life of the Local Plan. Consumer spending simply cannot be maintained indefinitely at its current rate, and to plan for a large increase is irresponsible.

Building the majority of homes outside urban areas is contrary to the advice of planners such as Lord Rogers, who has detailed the many advantages of increasing housing density in urban areas. The housing policy in this plan will result in a greater number of commuter journeys, creating more congestion, with an increase in air pollution across the borough. This is examined in detail in Annexe 1.
So there has to be a reappraisal of urban development plans, with more homes provided in urban areas, in particular in the centre of Guildford. As the council own many sites in the centre, these could be made available for development within the first 5 years of the plan, with mixed housing on these sites, including new social housing, which is sorely needed. Affordable housing is simply not affordable to anyone on the minimum wage, there is a need for a considerable expansion of social housing, a need that is not adequately recognised in the draft Local Plan.

In the detail of Policy D4, it is suggested that in urban areas and inset villages, planning permission will be granted provided that a proposed development:

- “Ensures that the layout, scale, form, massing, height of buildings and structures, and materials relate to the site context and its surroundings;”

There are several other criteria listed and the Policy then goes on to elaborate criteria specific to inset villages, as follows: “In addition to the above, proposals for new development within inset village areas will have particular regard to:

- The distinctive settlement pattern of the village and the important relationship between the built development and the surrounding landscape;
- Important views of the village from the surrounding landscape;
- Views within the village of local landmarks.”

There are numerous development sites proposed that mean that the first criterion cannot be met, as the developments proposed do not relate to the scale, form or massing of the site surroundings. For example, the Horsleys. Here it is proposed that a total of 3.6 km² should be removed from the green belt, with a total of 533 houses proposed on sites in East and West Horsley on a total of 29.1 ha, an average density of 18 dwellings/ha. These proposed developments are not in scale or proportion to the existing villages, and the housing density is considerably higher than existing housing density. Effectively, if these developments were to proceed, East and West Horsley would merge and become a large urban area in the green belt, totally different in character to the existing villages, with the existing settlement pattern completely lost. Similar considerations apply to other proposed development sites, such as Flexford and Normandy. In this case, 1.3 km² would be removed from the green belt with a total of 1,100 dwellings proposed on 67 ha, an average density of 16.4 dwellings/ha. Again, the scale and form of new development would overwhelm existing hamlets and villages, merging these to form another urban area in the heart of the green belt, with no consideration of the views of the settlements from the surrounding countryside, much of which has been given AONB status.

Thus the words of the policy statement D4 do not match the proposals contained in the draft local plan.

The “Reasoned Justification” for the policy consists of five paragraphs, 4.5.45 to 4.5.49. Of these, 4.5.45 and 4.5.46, 4.5.48 and 4.5.49 are not justifications for the policy, they are simply statements or further information. Paragraph 4.5.47 is the only attempted justification for this policy, but in fact this applies only to insetting. Paragraph 4.5.47 is factually wrong and so the justification for this policy does not bear close examination. Parts of this paragraph are taken in turn below, to show the inaccuracies this paragraph contains.

“Historically, development has been focused in the urban areas of Guildford, and Ash and Tongham only. Development in the villages has been very limited due to the Green Belt designation which previously washed over all but one of the villages.”

This depends on how development is measured. In terms of raw numbers, this may be true, but this would ignore the fact that urban area of Guildford town contains much of the housing in the borough. Taking the increase in housing stock between the censuses of 2001 and 2011 in specific wards reveals a much more complex picture. Effingham, for example, had a higher rate of adding dwellings than the average for the borough and some of Guildford’s urban wards. Using census data collected by the ONS, between 2001 and 2011, the number of dwellings in Effingham increased by 6.6%, whereas for the borough as a whole it increased by 5.0%. Over the same period in Merrow, a ward within the urban area of Guildford, the number of dwellings increased by only 1.2%, whilst in Normandy ward the increase was 2.6%. This analysis has not been exhaustive, but it is sufficient to show that the opening statement in paragraph 4.5.47 is incorrect, and that in some cases, proportionally, considerable development has occurred in green belt villages. It should be incumbent on GBC to assess the facts before making inaccurate statements such as this. ONS statistics are open to all.
In the first three months of 2016, planning applications for 12 additional dwellings in Effingham have been made, in a village of approximately 525 dwellings. Although one of these applications has been reduced from 6 to 4 dwellings, another 5 have been approved which shows clearly that development within villages washed over by the green belt can occur, and that organic growth is possible. There is no necessity for insetting.

“Fifteen villages are now inset from the Green Belt meaning that development is no longer, by definition, considered inappropriate”.

Guildford’s Green Belt boundaries were established in the Guildford Borough Local Plan 1987, so are well established. There has not been any justification for the extensive green belt review that accompanies the insetting of villages, or for the removal of these villages from the green belt. According to the NPPF, paragraph 83, green belt boundary changes should be made only in exceptional circumstances, as follows

“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.”

No exceptional circumstances have been demonstrated, with none given as justification in Policy D4 for the policy of insetting. Proposed green belt boundary changes are on a very large scale, as it is proposed to remove 14.4 km2 from the Green Belt, more than 6% of the existing area designated as green belt, and to create new green belt boundaries extending to more than 105 km. This is not a simple revision to the Green Belt, and a demonstration of exceptional circumstances is required for each and every change. This has not been done, not for a single proposed change.

Although Guildford Borough Council are in the process of producing a new Local Plan, this in itself is not enough to change Green Belt boundaries; the requirement to demonstrate exceptional circumstances still applies. According to a High Court judgement, Gallagher vs Solihull, issued March 30th, 2014, Case No. CO/17668/2013, there is still a requirement to prove exceptional circumstances – quotations below are from paragraph 125 of this judgement:

“However, it is not arguable that the mere process of preparing a new local plan could itself be regarded as an exceptional circumstance justifying an alteration to a Green Belt boundary. National guidance has always dealt with revisions of the Green Belt in the context of reviews of local plans…… and has always required “exceptional circumstances” to justify a revision. The NPPF makes no change to this.”

“Exceptional circumstances are required for any revision of the boundary, whether the proposal is to extend or diminish the Green Belt.”

Whilst each case is fact-sensitive and the question of whether circumstances are exceptional for these purposes requires an exercise of planning judgment, what is capable of amounting to exceptional circumstances is a matter of law, and a plan-maker may err in law if he fails to adopt a lawful approach to exceptional circumstances. Once a Green Belt has been established and approved, it requires more than general planning concepts to justify an alteration.”

Each and every proposed change to the green belt boundary requires that exceptional circumstances be demonstrated, otherwise the changes are not lawful. This has not been done by GBC, not for any proposed change. From paragraph 130 of this judgement

“In other words, something must have occurred subsequent to the definition of the Green Belt boundary that justifies a change. The fact that, after the definition of the Green Belt boundary, the local authority or an inspector may form a different view on where the boundary should lie, however cogent that view on planning grounds, that cannot of itself constitute an exceptional circumstance which necessitates and therefore justifies a change.”

“…..That, in his judgment, may now be so: but that falls very far short of the stringent test for exceptional circumstances that any revision of the Green Belt boundary must satisfy. There is nothing in this case that suggests that any of the assumptions upon which the Green Belt boundary was set has proved unfounded, nor has anything occurred since the Green Belt boundary was set that might justify the redefinition of the boundary.”
No changes that would warrant an alteration to green belt boundaries have been demonstrated by GBC, their so called “sensitivity analysis” was shallow and subjective, and no changes that may have occurred since the boundary was established were discussed. The changes proposed do not meet the standards set in this judgement. Instead, GBC maintain that it is housing need that creates blanket exceptional circumstances for changes proposed to the green belt. However, this is not the case. Following a meeting with local councillors and MPs in early 2014, Nick Boles wrote to Anne Milton MP to clarify the issue of exceptional circumstances and in this letter said:

“The written Ministerial Statement of 1 July 2013 set out the Government’s concern that some recent planning decisions have not accorded the Green Belt the level of protection that was the explicit policy intent of Ministers. It made clear that the single issue of unmet need – whether for conventional housing or for travellers sites – 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.”

This was reaffirmed more recently in a letter from Brandon Lewis to all English MPs, dated 07/06/2016. In this letter, Brandon Lewis said

“The Government has put in place the strongest protection for the Green Belt. 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 where very special circumstances exist, through the Local Plan process and with the support of local people. We have been repeatedly clear that demand for housing alone will not change Green Belt boundaries.”

These quotations show that the insetting process has considerable hurdles to overcome, including as it does the revision to Green Belt boundaries that accompanies insetting. Thus the most important questions are – did the flawed Pegasus “Guildford Borough Green belt and Countryside Study” show unequivocally that villages to be inset are not open villages, making no or a minimal contribution to the openness of the Green Belt; and that there were exceptional circumstances (other than unmet housing need) that justify a change to the Green Belt, creating a new boundary around all these villages – more than 105 km of new boundary? The Pegasus study did not do this, and this was just one of its many flaws. Some of these flaws are discussed in detail in Annexe 2.

As shown above, development has occurred within villages, and the NPPF made it easier for additional development to take place within the green belt, via the provisions of paragraph 89, which specifically makes it easier for limited infill to occur and on a larger scale, for affordable housing to be built within villages washed over by the Green Belt. These provisions came into effect in 2012 when the NPPF was adopted and so the rate of increase in housing within villages is very likely to increase beyond that observed in the period between the 2001 and 2011 censuses.

It is clear from the most recent figures for planning applications to GBC in 2016 in Effingham that the pace of development within villages is changing, even with continued green belt protection. There is no requirement for insetting villages within the green belt, and a desire to increase development within the villages is not an adequate basis for changing green belt boundaries to permit insetting.

The final part of paragraph 4.5.47 is

“In accordance with national policy, the important character of these inset villages should instead be protected using other development management policies”.

This is not national policy, national planning policy is provided by the NPPF, and paragraph 86 of the NPPF is the relevant paragraph, 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, 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.”

There is thus no national policy that requires insetting. Instead, a judgement should be made for each village based on whether the village is open, and if it makes a contribution to the openness of the Green Belt. In fact, many of the villages proposed for insetting exhibit an open pattern of development, and make an important contribution to the openness of the
green belt, for example, Effingham. This has not been considered, other than in the flawed Pegasus report, and the examination of their approach included in Annexe 2 reveals how this analysis was flawed. No further consideration has been given by GBC to insetting, and so GBC’s policy of wholesale insetting does not accord with a national policy, real or imagined, as claimed.

In itself, there are many issues with insetting, and these include:

- According to the draft Local Plan, insetting is based largely on the findings of the Pegasus study, “Guildford Borough Green Belt and Countryside Study. This report was very poor and various parts of the study criticised by many, including some borough councillors. It is perverse to continue with any recommendations of this study. In particular, a detailed review of this report for Effingham village showed that it was inaccurate and subjective. This review is attached as Annexe 2.
- The settlement hierarchy was also subject to a detailed review and again this showed that scoring methods used were inaccurate and subjective.
- Proposed boundary changes are arbitrary, without an adequate detailed survey. There are no checks and balances to this, even though the positioning of the boundary line can change the price of an acre of land from about £15,000 to over £1 million. There is no process to it, simply someone using a computer and a mouse – literally a mouse click can turn some land owners into millionaires. In some cases, the proposed boundary divides semi-detached houses, so that one is still inside the green belt and the other outside. In other cases, the boundary divides gardens, so that part of a garden is in, part out of the green belt. Due care and attention has not been given to producing proposed boundaries.
- In many cases, boundaries proposed do not comply with the requirements of the NPPF, which is given in the NPPF, paragraph 85, final bullet point, which states “define boundaries clearly, using physical features that are readily recognisable and likely to be permanent”. Given this NPPF definition, treelines, hedgerows, woodlands, etc should not be considered as potential Green Belt boundaries. In fact, in some cases proposed boundaries cross open fields, with no discernible features whatsoever. These are entirely inappropriate as a green belt boundary. The boundary proposed for Effingham village is reviewed in Annexe 3.

It should also be noted that GBC implicitly recognise that insetting is likely to lead to more development within villages on sites that are not identified in the draft Local Plan. But there is no recognition of this in the housing target. As is noted, insetting would mean that the rate of windfall development would increase, but GBC have not provided a proper analysis of windfall development (such as that provided by Mole Valley District Council) and they have failed to recognise a higher rate of windfall development in showing how the housing target will be met – even though, via Policy D4, they are planning for it. Windfalls should be deducted from the housing target, and the need for additional sites would thus be substantially reduced. Windfall development should be properly assessed and identified within the housing target, with an appropriate increase in the rate of windfalls in any villages that are inset.

Although a flawed justification was provided for the insetting of villages, this does not apply to all the areas selected for insetting, many of which are not “villages”. Some of these are adjacent to an Area of Outstanding Natural beauty (AONB) and in at least one case some areas of AONB have been included in the inset area. These areas include:

- HM Prison, Ripley Road, Send
- Keogh Barracks
- Pirbright Barracks (small areas of AONB included in inset area)
- Pirbright Institute
- Henley Business Park
- Garlick Arch

No attempt has been made to justify the insetting of these sites. In the absence of any attempt at justification there is no reason to inset these areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  
[Policy D4_Insetting.pdf](http://example.com) (1.3 MB)
Policy D4: I object to the insetting of villages (meaning in fact, removal of villages from Green Belt protections) and the fact that they will be suffer from higher density development and the resulting increase in traffic, use of infrastructure which is already under pressure. We object in particular to the insetting of West Clandon, Send and the Horsleys. This will have a detrimental impact on Green Belt openness and the views in and out of the AONB in direct contravention of Policy P1 and P2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1. POLICY D4

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

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Policy D4 is a death knell for the low density character of many of the villages. With land values so high it is inevitable that there will be a large amount of infill building as large garden plots are divided and developed. The wording of the policy is so vague and subjective that the planning process will offer no firm barrier to development at all. e.g. "relate to the site context" or "has no unacceptable effect". Who is deciding these, certainly not the people living there? Consider re-wording this.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/4308  **Respondent:** 8824065 / Robin Hubbard  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

I also object to the proposal to move the village settlement boundary which has existed for several decades and when there is no justifiable reason to move it other than to make a smoother line on the village map! The boundary follows the readily recognisable boundaries of mostly residential properties on the edge of the village and a public footpath. Again, why on earth would you do this? Who benefits?

Furthermore, the Council do not appear to be listening or supporting the local residents’ wishes, which was reflected when over 700 local residents signed a petition objecting to the proposed settlement boundary change last year. This issue has widespread support throughout the entire local community, with old and young, clubs and societies all uniting behind our passionate belief that these fields should be left as they are, outside the settlement boundary.

These fields contribute to the rather unique, open character of the village and lie at the heart of village life and our community facilities which are open for all to use. The elevation of this land is the highest in the area, rising to over 32 feet above Kings Road, and so any potential development on it would dominate the entire local area and tower over the local houses and village community facilities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/3127  **Respondent:** 8826177 / Charles Spence  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

Policy D4 states some vague guidelines for permitting development in urban areas and inset villages. The proposed monitoring indicator is the number of appeals allowed. This is monitoring the wrong thing; instead it should be monitoring the absolute number of appeals, as this is a better indicator of the quality of development proposals. This is a good example of the plan ignoring the needs of local communities outside Guildford and I object to the plan overall.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

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POLICY D4

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Policy D4

I OBJECT to the insetting of villages a.k.a. removal of villages from Green Belt protection. I OBJECT to the insetting of West Clandon, Send, East Horsley and West Horsley which will have a detrimental impact on the openness of the Green Belt and the views in and out of the AONB.

These neighbouring village developments will result in higher density development, additional road traffic and use of infrastructure in our area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
All the stated policy aims for “inset” villages will be negated by the excessive weight of new housing development proposed which would radically change their character forever.

There are effectively two separate parts to this policy, both are flawed, and in the case on “insetting”, fatally flawed. In the case of urban development there are numerous flaws, including:

- The plan envisages that 40% of homes built will be affordable, but this provides no accommodation for low paid workers, e.g. those on the minimum wage, who cannot afford to buy “affordable” homes, nor can they pay the so-called “affordable” rent. There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low paid workers such as those employed in the retail, warehousing and distribution sectors.
- The number of homes planned in the urban area is too low – there is a need for regeneration in some areas, but this is ignored and instead the plan concentrates on building homes on green field sites, which does not meet the needs for housing within the town, especially with the centre. This is not a sustainable policy as building outside the town has a disproportionate effect on road traffic.
- The plan envisages a large expansion of the traditional “bricks and mortar” retail sector, but this is a sector in long term decline.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to policy D4 Development in urban areas and inset villages.

This policy that does not address the opportunity for building in the urban area.

The plan envisages that 40% of homes built will be ‘affordable’, but this does not provide any accommodation for low-paid workers, for example, those on the minimum wage, who cannot afford to buy so-called ‘affordable’ homes or pay an ‘affordable’ rent. There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low-paid workers such as those employed in the retail, warehousing and distribution sectors (all of which this plan aspires to expand).

The number of homes planned in the urban area is much too low. There is a glaring need for regeneration in many urban areas, particularly Guildford Town Centre but this is ignored in favour of building homes on green-field sites instead.

This will not address urban housing needs. It is also unsustainable, since building outside the town does disproportionate harm to road traffic, air quality and overstretched infrastructure.
The plan envisages a large expansion of the retail sector, but this is hard to justify because the sector is in rapid and continuous decline.

THE BROWNFIELD OPPORTUNITY

Yes, we need a new Local Plan for our borough in order to provide a development strategy within which we can accommodate our local housing, economic and environmental needs. But first we must make good use of our urban brownfield before we consider building in the Green Belt or countryside.

Paragraph 80 of the NPPF clearly states that Green Belt serves a key purpose, ‘to assist in urban regeneration, by encouraging the recycling of derelict land and other urban land’. In order to comply with central planning policy we need a brownfield strategy that states clearly. ’We are committed to a brownfield first initiative whereby all applications on previously developed land are given fast track priority and every facility to promote development for residential purposes and employment purposes in order to satisfy the needs of local people. In parallel a low CIL incentive should be given for all residential development on brownfield land.

In response to the detailed objections received in the Regulation 18 process of the 2014 Local Plan and also in accordance with government policy a Guildford brownfield land register should be urgently compiled showing address, ownership, occupier, current use and detailed planning brief

Perhaps someone could be appointed at GBC with a clear briefing to deliver brownfield targets of housing and employment space

GBC needs to accelerate the residential redevelopment at Woodbridge Meadows, Walnut Tree Close and the Station within the next 5 years

GBC needs to examine the residential development opportunity of the 25.7 acres of car parks in GBC ownership

I do not consider that the target of 1,172 homes in the town centre takes account of the need and demand for housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town which will in itself help to sustain the retail core by increased economic impact.

The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015 which has recently been adopted by GBC. The reality is that the Town Centre has the capacity for significantly more homes. See details on GGG website - Guildford Greenbelt Group.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13427  Respondent: 8840033 / Jimmy Daboo  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY D4

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.
The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/13187  **Respondent:** 8840449 / David Wilson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**POLICY D1 TO D4: Design**

12.1. I OBJECT to D4 to the extent that it proposes the insetting of villages to remove them 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:** PSLPP16/18191  **Respondent:** 8843361 / Adrian Atkinson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to policy D4 Development in urban areas and inset villages. This policy that does not address the opportunity for building in the urban area. There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low-paid workers such as those employed in the retail, warehousing and distribution sectors (all of which this plan aspires to expand). The number of homes planned in the urban area is much too low. There is a glaring need for regeneration in many urban areas, particularly Guildford Town Centre but this is ignored in favour of building homes on green-field sites instead. This will not address urban housing needs. It is also unsustainable, since building outside the town does disproportionate harm to road traffic, air quality and overstretched infrastructure. The plan envisages a large expansion of the retail sector, this sector is in rapid and continuous decline.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/3206  **Respondent:** 8850433 / Ian Doherty  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I support this design policy, although not the proposal of Policy P2 to inset East Horsley from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
POLICY D4: Development in urban areas and inset villages

I support this design policy, but object to the proposal of Policy P2 to inset East Horsley from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Comment ID: PSLPP16/12855  Respondent: 8851233 / Helen Bayes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY D4: Development in urban areas and inset villages

I support this design policy, but object to the proposal of Policy P2 to inset East Horsley from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Comment ID: PSLPP16/2182  Respondent: 8854433 / Bryan Smith Associates (Bryan Smith)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( Yes ), is Legally Compliant? ( Yes )

I support the more realistic view taken as to the redefinition of some of the villages in the Green Belt. Of particular interest is the village of Effingham where for some 10 years, through a number of GBC consultation documents arguments have been presented suggesting that instead of the "washed over" Green Belt designation given to villages that each settlement should be surveyed and village boundaries and the relationship to the Green Belt needed to be reconsidered. Pleased to note that exercise has now been undertaken with the result that a site in Church Street can now be more appropriately assessed for residential development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to policy D4 Development in urban areas and inset villages

Summary

There are effectively two separate parts to this policy, both are flawed, and in the case on insetting, fatally flawed. In the case of urban development there are numerous flaws, including:

- The plan envisages a large expansion of the traditional “bricks and mortar” retail sector, but this is a sector in long term decline.
- The plan envisages that 40% of homes built will be affordable, but this does not provide any accommodation for low paid workers, for example, those on the minimum wage, who cannot afford to buy “affordable” homes, not can they pay the so-called “affordable” rent. There is a great need for an expansion in social housing, especially in urban areas, where there is a greater concentration of low paid workers such as those employed in the retail, warehousing and distribution sectors.
- The number of homes planned in the urban area is too low – there is a need for regeneration in some areas, but this is ignored and instead the plan concentrates on building homes on green field sites, which does not meet the needs for housing within the town, especially with the centre. This is not a sustainable policy as building outside the town has a disproportionate effect on road traffic.

In the case of insetting, the policy is fatally flawed, for two separate reasons.

- Firstly, it is based on an erroneous assumption. GBC justify the policy (in para 4.5.50) by suggesting, without any supporting data, that development in villages washed over by the green belt is at a lower rate than within Guildford town. This is not the case, and statistics from the ONS censuses of 2001 and 2011 show that this is assumption is incorrect. These statistics show that the growth rate in housing was higher in, for example, Effingham, a village washed over by the green belt than Merrow, a suburb of Guildford which is not washed over by the green belt. In fact, the rate of increase in housing stock in Effingham was faster than the average for the borough.
- Insetting has been based on the assumptions set out in the Green Belt and Countryside Study, but this is not referred to as part of the Evidence base. The analysis in this document was flawed to the extent that it is valueless. It has serious flaws in its methodology, includes subjective judgements, and thus its conclusions are flawed. These flaws are so serious that it should be removed from the evidence base that supports the Local Plan. However, removing the reference but retaining the decision process means that the decisions are based on flawed assumptions.

Urban development

There is a fundamental flaw in the draft Local Plan, in that there are not enough dwellings planned in urban areas, in particular, Guildford town centre. This is where the demand for affordable homes is most acute, a fact which is recognised in much of the draft Local Plan. Yet the plan then envisages that most dwellings will be built outside the urban area, so there is no continuity in the plan – if the demand for affordable homes is most acute within the town, then is where these dwellings should be built. There are sites available, for example, various sites in Woodbridge Meadows, Walnut Tree Close (including the area around the station) and North Street. Yet the focus in these areas is to provide a very limited number of dwellings, with the emphasis on additional retail space and more commercial premises. Given the profound changes in traditional retail, this is not a sustainable policy. There have been many examples of bankruptcies amongst traditional retailers, the most recent examples being BHS and Austin Reed, and previously Woolworths, Comet, etc. The British Retail Consortium forecast that by 2020 up to one third of those now employed in traditional retail could lose their jobs, due to a combination of the move to the internet and higher costs, from business rates and increases in the minimum wage. Recent figures show that online sales are still growing quickly, with more than 13% of total retail sales now made over the internet. Nor does an expansion in traditional retail chime with the objective of attracting highly paid jobs to the area – the majority of jobs in retail are low paid, with zero hours contracts and usually a pay rate based on the
minimum wage. So any expansion in traditional bricks and mortar retail would create a greater demand for affordable and social housing – exactly the reverse of what is needed.

Even the major grocery retail chains have been affected by changes in retail habits – Tesco, Sainsburys, Morrisons, etc are closing some stores, with no major large stores planned. Banks and other financial institutions are still closing some branches, so changes in town centres still have some way to go – but none of these changes are recognised in the draft Local Plan, which envisages no limit to traditional retail.

There is another reason why the retail sector is unlikely to exhibit long term growth, and this is consumer debt, which has reached a level that the Bank of England have said could contribute to economic stability. This is likely to have a greater destabilising effect in the event of an economic downturn – and there will certainly be at least two of these during the life of the Local Plan. Retail spending simply cannot be maintained indefinitely at its current rate, and to plan for a large increase in consumer spending is irresponsible.

So there has to be a reappraisal of the urban development plans, with more homes provided in urban areas, in particular in the centre of Guildford, before there is any consideration of building outside the urban area. These are not separate policies to be considered separately, but hang together as part of a holistic plan. As the council own many sites in the centre, these could be made available for development within the first 5 years of the plan, with mixed housing on these sites, including new social housing, which is sorely needed. Affordable housing is simply not affordable to anyone on the minimum wage, there is a need for a considerable expansion of social housing, a need that is not adequately recognised in the draft Local Plan.

In the detail of Policy D4, it suggests that in urban areas and inset villages planning permission will be granted provided that a proposed development:

- “Ensures that the layout, scale, form, massing, height of buildings and structures, and materials relate to the site context and its surroundings;”.....

There are several other criteria listed and the Policy then goes on to elaborate criteria specific to inset villages, as follows:

“In addition to the above, proposals for new development within inset village areas will have particular regard to:

- The distinctive settlement pattern of the village and the important relationship between the built development and the surrounding landscape;
- Important views of the village from the surrounding landscape;
- Views within the village of local landmarks.”

There are numerous development sites proposed that mean that the first criterion cannot be met, as the developments proposed do not relate to the scale, form or massing of the site surroundings. For example, in West Horsley and East Horsley, there are number of sites where this does not apply. It is proposed that a total of 3.6 km² should be removed from the green belt, with a total of 533 houses proposed on sites in East and West Horsley on a total of 29.1 ha, an average density of 18 dwellings/ha. These proposed developments are not in scale or proportion to the existing villages, and the housing density is considerably higher than existing housing density. Effectively, if these developments were to proceed, East and West Horsley would merge and become a large urban area in the green belt, totally different in character to the existing villages, with the existing settlement pattern completely lost. Similar considerations apply to other proposed development sites, such as Flexford and Normandy. In this case, 1.3 km² would be removed from the green belt and a total of 1100 dwellings proposed on 67 ha, with an average density of 16.4 dwellings/ha. Again, the scale and form would overwhelm existing hamlets and villages, merging these to form another urban area in the heart of the green belt, with no consideration of the views of the settlements from the surrounding countryside, much of which has been given AONB status.

Thus the words of the policy statement D4 do not match the proposals contained in the draft local plan.

The “Reasoned Justification” for the policy consists of five paragraphs, 4.5.48 to 4.5.52. Of these, 4.5.48 and 4.5.49, 4.5.51 and 4.5.52 are not justifications for the policy, they are simply statements or further information. Paragraph 4.5.50 is the only attempted justification for this policy, but in fact this applies only to insetting. Paragraph 4.5.50 is factually
wrong and so the justification for this policy does not bear close examination. Parts of this paragraph are taken in turn below, to show the inaccuracies this paragraph contains.

“Historically, development has been focused in the urban areas of Guildford, and Ash and Tongham only. Development in the villages has been very limited due to the Green Belt designation which previously washed over all but one of the villages.”

This depends on how development is measured. In terms of raw numbers, this may be true, but this would ignore the fact that urban area of Guildford town contains much of the housing in the borough. Taking the increase in housing stock between the censuses of 2001 and 2011 in a specific wards reveals a much more complex picture. The village and ward of Effingham, for example, had a higher rate of adding dwellings than the average for the borough and for at least some of the Guildford urban wards. Using census data collected by the ONS, between 2001 and 2011, the number of dwellings in Effingham increased by 6.6%, whereas for the borough as a whole it increased by 5.0%. Over the same period in Merrow, a ward within the urban area of Guildford, the number of dwellings increased by only 1.2%, whilst in Normandy ward the increase was 2.6%. This analysis has not been exhaustive, but it is sufficient to show that the opening statement in paragraph 4.5.47 is incorrect, and that in some cases, proportionally, considerably more development has occurred in green belt villages. It must be incumbent on GBC to assess the facts before making false statements such as this.

Opinions are not facts. ONS statistics are open to all.

In the first three months of 2016, planning applications for 11 additional dwellings in Effingham have been made, in a village of approximately 525 dwellings. One of these applications has been reduced from 6 to 4 dwellings, whilst the other 5 have been approved. This shows clearly that development within villages washed over by the green belt can occur, and that organic growth is possible. There is no necessity for insetting.

“Fifteen villages are now inset from the Green Belt meaning that development is no longer, by definition, considered inappropriate”.

Guildford’s Green Belt boundaries were established in the Guildford Borough Local Plan 1987, so are well established. There has not been any justification for the extensive green belt review that accompanies the insetting of villages, or for the removal of these villages from the green belt. According to the NPPF, paragraph 83, green belt boundary changes should be made only in exceptional circumstances, as follows

“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.”

No exceptional circumstances have been demonstrated, with none given as justification in Policy D4 for the policy of insetting. Proposed green belt boundary changes are on a very large scale, as it is proposed to remove more than 6% of the existing area designated as green belt, and to create new green belt boundaries extending to more than 105 km. This is not a simple revision to the green belt, and a demonstration of exceptional circumstances is required for each change. This has not been done, not for a single proposed change.

Although Guildford Borough Council are in the process of producing a new Local Plan, this in itself is not enough to change Green Belt boundaries; the requirement to demonstrate exceptional circumstances still applies. According to a High Court judgement, Gallagher vs Solihull, issued March 30th, 2014, Case No. CO/17668/2013, there is still a requirement to prove exceptional circumstances – quotations below are from paragraph 125 of this judgement:

“However, it is not arguable that the mere process of preparing a new local plan could itself be regarded as an exceptional circumstance justifying an alteration to a Green Belt boundary. National guidance has always dealt with revisions of the Green Belt in the context of reviews of local plans…… and has always required “exceptional circumstances” to justify a revision. The NPPF makes no change to this.”

“Exceptional circumstances are required for any revision of the boundary, whether the proposal is to extend or diminish the Green Belt.”
Whilst each case is fact-sensitive and the question of whether circumstances are exceptional for these purposes requires an exercise of planning judgment, what is capable of amounting to exceptional circumstances is a matter of law, and a plan-maker may err in law if he fails to adopt a lawful approach to exceptional circumstances. Once a Green Belt has been established and approved, it requires more than general planning concepts to justify an alteration.

Each and every proposed change to the green belt boundary requires that exceptional circumstances be demonstrated, otherwise the changes are not lawful. This has not been done by GBC, not for any proposed change.

From paragraph 130 of this judgement

“In other words, something must have occurred subsequent to the definition of the Green Belt boundary that justifies a change. The fact that, after the definition of the Green Belt boundary, the local authority or an inspector may form a different view on where the boundary should lie, however cogent that view on planning grounds, that cannot of itself constitute an exceptional circumstance which necessitates and therefore justifies a change.”

“…..That, in his judgment, may now be so: but that falls very far short of the stringent test for exceptional circumstances that any revision of the Green Belt boundary must satisfy. There is nothing in this case that suggests that any of the assumptions upon which the Green Belt boundary was set has proved unfounded, nor has anything occurred since the Green Belt boundary was set that might justify the redefinition of the boundary.”

No changes that would warrant an alteration to green belt boundaries have been demonstrated by GBC, their so called “sensitivity analysis” is shallow and subjective, and changes that may have occurred since the boundary was established was discussed. The changes proposed do not meet the standards set in this judgement. Instead, GBC maintain that it is housing need that creates blanket exceptional circumstances for changes proposed to the green belt. However, this is not the case. Following a meeting with local councillors and MPs in early 2014, Nick Boles wrote to Anne Milton MP to clarify the issue of exceptional circumstances and in this letter said:

“The written Ministerial Statement of 1 July 2013 set out the Government’s concern that some recent planning decisions have not accorded the Green Belt the level of protection that was the explicit policy intent of Ministers. It made clear that the single issue of unmet need – whether for conventional housing or for travellers sites – 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.”

These quotations show that the insetting process has considerable hurdles to overcome, including as it does the revision to Green Belt boundaries that accompanies insetting. Thus the most important questions are – did the flawed Pegasus “Guildford Borough Green belt and Countryside Study” show unequivocally that villages to be inset are not open villages, making no or a minimal contribution to the openness of the Green Belt; and that there were exceptional circumstances (other than unmet housing need) that justify a change to the Green Belt, creating a new boundary around all these villages – more than 105 km of new boundary? The Pegasus study did not do this, and this was just one of its many flaws (cf Annexe XX)

As shown above, development has occurred within villages, and the NPPF made it easier for additional development to take place within the green belt, via the provisions of paragraph 89, which specifically makes it easier for limited infill to occur and on a larger scale, for affordable housing to be built within villages washed over by the green belt. These provisions came into effect in 2012, when the NPPF was adopted and so the rate of increase in housing within villages is very likely to increase beyond that observed in the period between the 2001 and 2011 censuses.

It is clear from the most recent figures for planning applications to GBC in 2016 in Effingham that the pace of development within villages is changing, even with continued green belt protection. There is no requirement for insetting villages within the green belt, and the desire to increase development within the villages is not an adequate basis for insetting.

The final part of paragraph 4.5.47 is

“In accordance with national policy, the important character of these inset villages should instead be protected using other development management policies”.

"In accordance with national policy, the important character of these inset villages should instead be protected using other development management policies”.
This is not national policy, national planning policy is provided by the NPPF, and paragraph 86 of the NPPF is the relevant paragraph, 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, 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.”

There is thus no national policy that requires insetting. Instead, a judgement should be made for each village based on its contribution to the openness of the green belt. In fact, many of the villages proposed for insetting exhibit an open pattern of development, and so make an important contribution to the openness of the green belt, for example, Effingham. This has not been considered, other than in the flawed Pegasus report, and the examination of their approach reveals how this analysis was flawed. No further consideration has been given by GBC, and so GBC’s policy of wholesale insetting does not accord with national policy, as claimed.

In itself, there are many issues with insetting, and these include:

- According to the previous draft of the Local Plan, subject to the Regulation 18 consultation during summer 2014, insetting is based largely on the findings of the Pegasus study, “Guildford Borough Green Belt and Countryside Study. This report was very poor and various parts of the study criticised by many, including some borough councillors. It is perverse to continue with any recommendations of this study. In particular, a detailed review of this report for Effingham village showed that it was inaccurate and subjective.
- The settlement hierarchy was also subject to a detailed review and again this showed that scoring methods used were inaccurate and subjective.
- Boundary changes are arbitrary, without an adequate detailed survey. There are no checks and balances to this, even though the positioning of the line can change the price of an acre of land from about £15,000 to over £1 million. There is no process to it, simply someone using a computer and a mouse – literally a mouse click can turn some land owners into millionaires. In some cases, the proposed boundary divides semi-detached houses, so that one is still inside the green belt and the other outside. In other cases, the boundary divides gardens, so that part of a garden is in, part out of the green belt. Due care and attention has not been given to producing proposed boundaries.
- In many cases, boundaries proposed do not comply with the requirements of the NPPF, which is given in the NPPF, paragraph 85, final bullet point, which states

“define boundaries clearly, using physical features that are readily recognisable and likely to be permanent”.

Given this NPPF definition, treelines, hedgerows, woodlands, etc should not be considered as potential Green Belt boundaries. In fact, in some cases proposed boundaries cross open fields, with no discernible features whatsoever. These are entirely inappropriate as a green belt boundary.

It should also be noted that GBC implicitly recognise that insetting is likely to lead to more development within villages on sites that are not identified in the draft Local Plan. But there is no recognition of this in the housing target. As is noted, insetting would mean that the rate of windfall development would increase, but GBC have not provided a proper analysis of windfall development (such as that provided by Mole Valley District Council) and they have failed to recognise a higher rate of windfall development in showing how the housing target will be met – even though, via Policy D4, they are planning for it. Windfalls should be deducted from the housing target, and the need for additional sites would thus be substantially reduced. Windfall development should be properly assessed and identified within the housing target, with an appropriate increase in the rate of windfalls in any villages that are inset.

**THE BROWNFIELD OPPORTUNITY**

Yes, we need a new Local Plan for our borough in order to provide a development strategy within which we can accommodate our local housing, economic and environmental needs. But first we must make 100% use of our **urban brownfield** before we consider building in the Green Belt or countryside.
Paragraph 80 of the NPPF clearly states that Green Belt serves a key purpose, “to assist in urban regeneration, by encouraging the recycling of derelict land and other urban land”. In order to comply with central planning policy we need a brownfield strategy that states clearly. “We are committed to a brownfield first initiative whereby all applications on previously developed land are given fast track priority and every facility to promote development for residential purposes and employment purposes in order to satisfy the needs of local people. In parallel a zero CIL incentive should be given for all residential development on brownfield land.

In response to the detailed objections received in the Regulation 18 process of the 2014 Local Plan and also in accordance with government policy a Guildford brownfield land register should be urgently compiled showing address, ownership, occupier, current use and detailed planning brief

A head of brownfield should be appointed at GBC with a clear briefing to deliver brownfield targets of housing and employment space

GBC needs to accelerate the residential redevelopment at Woodbridge Meadows, Walnut Tree Close and the Station within the next 5 years

GBC needs to examine the residential development opportunity of the 25.7 acres of car parks in GBC ownership

I do not consider that the target of 1,172 homes in the town centre takes account of the need and demand for housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town which will in itself help to sustain the retail core by increased economic impact.

The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015 which has recently been adopted by GBC. The reality is that the Town Centre has the capacity for at least 5,000 homes.

The additional target capacity of 5,000 could easily be provided within the following urban sites which have the capacity for 7,500 homes:

- 2,500 homes detailed in Masterplan 2015 including Woodbridge Meadows which can itself be increased substantially
- 500 homes at North Street
- 1,000 homes on current GBC car parks (25 acres) and at the station
- 1,000 homes saved in the urban area if 100% of students are accommodated on Surrey University campus (17 ha of car parks)
- 1,000 homes at Slyfield on the 40 ha regeneration site
- 1,000 windfall infill (50 per annum)
- 500 homes on brownfield sites in villages on sites of max 1ha which do not impact Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object. Low paid workers won't be able to afford the 'affordable' rent on 'affordable' homes. These should be built in the urban areas. The villages will suffer with the congestion and infrastructure strains and their character changed adversely for ever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10392  Respondent: 8858881 / Stephen Meredith  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development. The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2234  Respondent: 8860897 / Julia Shaw  Agent:

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.

There are effectively two separate parts to this policy, both are flawed, and in the case on insetting, fatally flawed. In the case of urban development there are numerous flaws, including:

- The plan envisages that 40% of homes built will be affordable, but this does not provide any accommodation for low paid workers, for example, those on the minimum wage, who cannot afford to buy “affordable” homes, nor can they pay the so-called “affordable” rent. There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low paid workers such as those employed in the retail, warehousing and distribution sectors.
- The number of homes planned in the urban area is too low – there is a need for regeneration in some areas, but this is ignored and instead the plan concentrates on building homes on green field sites, which does not meet the needs for housing within the town, especially with the centre. This is not a sustainable policy as building outside the town has a disproportionate effect on road traffic.
- The plan envisages a large expansion of the traditional “bricks and mortar” retail sector, but this is a sector in long term decline.

There is a fundamental flaw in the draft Local Plan, in that there are not enough dwellings planned in urban areas, in particular, Guildford town centre. This is where the demand for affordable homes is most acute, a fact which is
recognised in much of the draft Local Plan. Yet the plan then envisages that most dwellings will be built outside the urban area, so there is no continuity in the plan – if the demand for affordable homes is most acute within the town, then this where these dwellings should be built. There are sites available, for example, various sites in Woodbridge Meadows, Walnut Tree Close (including the area around the station) and North Street. Yet the focus in these areas is to provide a very limited number of dwellings, with the emphasis on additional retail space and more commercial premises. Given the profound changes in traditional retail, this is not a sustainable policy. There have been many examples of bankruptcies amongst traditional retailers, the most recent examples being BHS and Austin Reed, and previously Woolworths, Comet, etc. The British Retail Consortium forecast that by 2020 up to one third of those now employed in traditional retail could lose their jobs, due to a combination of the move to the internet and higher costs, from business rates and increases in the minimum wage. Recent figures show that online sales are still growing quickly, with more than 13% of total retail sales now made over the internet. Nor does an expansion in traditional retail chime with the objective of attracting highly paid jobs to the area – the majority of jobs in retail are low paid, with zero hours contracts and usually a pay rate based on the minimum wage. So any expansion in traditional bricks and mortar retail would create a greater demand for affordable and social housing – exactly the reverse of what is needed.

Even the major grocery retail chains have been affected by changes in retail habits – Tesco, Sainsburys, Morrisons, etc are closing some stores, with no major large stores planned. Banks and other financial institutions are still closing some branches, so changes in town centres still have some way to go – but none of these changes are recognised in the draft Local Plan, which envisages no limit to traditional retail.

There is another reason why the retail sector is unlikely to exhibit long term growth, and this is consumer debt, which has reached a level that the Bank of England have said could contribute to economic stability. This is likely to have a greater destabilising effect in the event of an economic downturn – and there will certainly be at least two of these during the life of the Local Plan. Retail spending simply cannot be maintained indefinitely at its current rate, and to plan for a large increase in consumer spending is irresponsible.

So there has to be a reappraisal of the urban development plans, with more homes provided in urban areas, in particular in the centre of Guildford, before there is any consideration of building outside the urban area. These are not separate policies to be considered separately, but hang together as part of a holistic plan. As the council own many sites in the centre, these could be made available for development within the first 5 years of the plan, with mixed housing on these sites, including new social housing, which is sorely needed. Affordable housing is simply not affordable to anyone on the minimum wage, there is a need for a considerable expansion of social housing, a need that is not adequately recognised in the draft Local Plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/11382  **Respondent:** 8865537 / P Waldner  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development. The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
Comment ID: PSLPP16/11601  Respondent: 8881537 / Jean Baptist  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy D4 - Development in urban areas and inset villages

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17581  Respondent: 8889761 / A Dougherty  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

13. I OBJECT to redefining land from the Green Belt to 'Inset' in areas of outstanding natural beauty and only under the pretense of making it easier to build extensions & conservatories as stated by a GBC councillor.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9344  Respondent: 8892737 / David Eagle  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4
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: PSLPP16/8466  Respondent: 8893057 / Dianne Garnett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy D4: Development in urban areas and inset villages.

I Object to this policy as I feel that Social housing rather than 'affordable housing', which many on very low wages cannot afford, WITHIN regenerated 'brownfield sites' in urban areas instead of concentrating on greenfield sites should be used. Jobs would be closer at hand, and added pressure on the rural roads would be obviated. The plan envisages shops and retail buildings on the brownfield sites. Use of department stores and retail space is in decline with big names closing. Why add to white elephants when the space is needed for housing people close to work and transport hubs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16982  Respondent: 8893057 / Dianne Garnett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

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 D4 Development in urban areas and inset villages

1.2 This policy that does not address the opportunity for building in the urban area

1.3 The plan envisages that 40% of homes built will be “affordable”, but this does not provide any accommodation for low-paid workers, for example, those on the minimum wage, who cannot afford to buy so-called “affordable” homes or pay an “affordable” rent. There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low-paid workers such as those employed in the retail, warehousing and distribution sectors (all of which this plan aspires to expand).

1.4 The number of homes planned in the urban area is much too low. There is a glaring need for regeneration in many urban areas, particularly Guildford Town Centre but this is ignored in favour of building homes on green-field sites instead.

1.5 This will not address urban housing needs. It is also unsustainable, since building outside the town does disproportionate harm to road traffic, air quality and overstretched infrastructure.

1.6 The plan envisages a large expansion of the retail sector, but this is a sad voice from the past because the sector is in rapid and continuous decline.

1.7 All the stated policy aims for “inset” villages will be negated by the excessive weight of new housing development proposed which would radically change their character forever.

2 THE BROWNFIELD OPPORTUNITY
2.1 Yes, we need a new Local Plan for our borough in order to provide a development strategy within which we can accommodate our local housing, economic and environmental needs. **But first** we must make 100% use of our urban brownfield before we consider building in the Green Belt or countryside.

2.2 Paragraph 80 of the NPPF clearly states that Green Belt serves a key purpose, “to assist in urban regeneration, by encouraging the recycling of derelict land and other urban land”. In order to comply with central planning policy we need a brownfield strategy that states clearly. “We are committed to a brownfield first initiative whereby all applications on previously developed land are given fast track priority and every facility to promote development for residential purposes and employment purposes in order to satisfy the needs of local people. In parallel a zero CIL incentive should be given for all residential development on brownfield land.

2.3 In response to the detailed objections received in the Regulation 18 process of the 2014 Local Plan and also in accordance with government policy a Guildford brownfield land register should be urgently compiled showing address, ownership, occupier, current use and detailed planning brief

2.4 A head of brownfield should be appointed at GBC with a clear briefing to deliver brownfield targets of housing and employment space

2.5 GBC needs to accelerate the residential redevelopment at Woodbridge Meadows, Walnut Tree Close and the Station within the next 5 years

2.6 GBC needs to examine the residential development opportunity of the 25.7 acres of car parks in GBC ownership

2.7 We do not consider that the target of 1,172 homes in the town centre takes account of the need and demand for housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town which will in itself help to sustain the retail core by increased economic impact.

2.8 The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015 which has recently been adopted by GBC. The reality is that the Town Centre has the capacity for at least 5,000 homes.

2.9 The additional target capacity of 5,000 could easily be provided within the following urban sites which have the capacity for 7,500 homes:

- 2,500 homes detailed in Masterplan 2015 including Woodbridge Meadows which can itself be increased substantially
- 500 homes at North Street
- 1000 homes on current GBC car parks (25 acres) and at the station
- 1000 homes saved in the urban area if 100% of students are accommodated on Surrey University campus (17 ha of car parks)
- 1000 homes at Slyfield on the 40 ha regeneration site
- 1000 windfall infill (50 per annum)
- 500 homes on brownfield sites in villages on sites of max 1ha which do not impact 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>PSLPP16/4844</th>
<th>Respondent:</th>
<th>8893697 / Gill Woolfson</th>
<th>Agent:</th>
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</table>
The NPPF 82 refers

Objection to Policy D4  Development in urban areas and inset villages

Development in urban areas is vastly different to development in villages. It concerns me that the two are brought together in D4.

Most of Guildford's villages contribute to the openness of the countryside. Their buildings are generally low rise and widely spaced, giving views of the surrounding countryside. The nature of the Guildford countryside will be spoiled if the open character of its villages is damaged. Allowing urban density development within inset villages will damage villages. Development is possible in washed-over villages, either by using brownfield sites such as redundant garages and pubs, or permitted development, such as rural exception housing. It is these types of developments that will preserve the character of the countryside. D4 seeks to create urban blocks in the countryside.

NPPF para 86 refers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
16. POLICY D4

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7122  Respondent: 8897473 / John Fluker  Agent:

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.

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: PSLPP16/8044  Respondent: 8899713 / Tessa Crago  Agent:

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Attached documents:

<table>
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<th>Comment ID: PSLPP16/4126</th>
<th>Respondent: 8901633 / Duncan Gray</th>
<th>Agent:</th>
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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: PSLPP16/8166</th>
<th>Respondent: 8902465 / Linda Slater</th>
<th>Agent:</th>
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</table>

I OBJECT TO POLICY D4 (DEVELOPMENT IN URBAN AREAS AND INSET VILLAGES)

- No commitment to expand social housing or accommodation for people who can’t afford so-called affordable homes.
- Not enough new homes in urban areas, despite demand and need for urban regeneration and protection of Green Belt.
- Objectives for inset villages cancelled out by plans for excessive housing growth there.
- Too much emphasis on traditional shops, when a lot of this sector is in terminal decline.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/18533</th>
<th>Respondent: 8903265 / Susan Anderson</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4</td>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
encouraging the recycling of derelict and other urban land’. Guildford Borough Council should ensure that all other urban land has been used and establish that there is a continuing unsatisfied demand before any Green Belt land is even considered. If the demand for affordable homes is most acute within the town, then that is where the development of affordable housing should be concentrated. Yet the emphasis in these areas is on additional retail space and more commercial premises. Considering the fact that there have been major changes in the traditional retail sector, this is not a sustainable policy.

Lead Councillor Spooner commented at the Full Council Meeting of May 24 “The traffic queues coming into Guildford each morning show the numbers of workers that must travel from far. That is why we must take action.” And yet by concentrating the building in the villages outside the town centre there will be an increase in the amount of traffic driving into the town – it doesn’t make sense and it surely isn’t sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1432  Respondent: 8917665 / Frances Porter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Policy D4 – Development in urban areas. Affordable homes are not an option for most people due to the serious high costs of homes within Surrey. The need for homes within the major towns are the main requirement, where people can assess employment nearer to their homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13253  Respondent: 8919009 / Andrew Kukielka  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

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: PSLPP16/3532  Respondent: 8919521 / Susan Hughes  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

D4 Development in urban areas and inset villages OBJECT. As mentioned before, I object to the insetting of East Horsley from the Green Belt. Development in inset villages is unsustainable as it does disproportionate harm to road traffic, air quality and overstretched services, such as schools and medical centres.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11995  Respondent: 8921377 / Paul Maycox  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

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: PSLPP16/13252  Respondent: 8921857 / Claire Kukielka  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

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: PSLPP16/15157  Respondent: 8926529 / Annie Cross  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Policy D4 - Development in Urban Areas and Inset Villages**

I do not object if policies H2 and H3 are implemented and all H2 developments are implemented without developers using clause 4.2.40 to escape their responsibilities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/74  Respondent: 8929057 / East Horsley Parish Council (Nick Clemens)  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**POLICY D4: Development in urban areas and inset villages**

We support this design policy, although not the proposal of Policy P2 to inset 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: PSLPP16/4465  Respondent: 8930209 / Ray Corstin  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

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: PSLPP16/8786  Respondent: 8933185 / Peter See  Agent:
### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

<table>
<thead>
<tr>
<th>Section</th>
<th>Page 106, Policy D4: Development in Urban Area and Inset Villages</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Objection</strong></td>
<td>to villages being inset between Ash and Guildford, eg Normandy and Flexford. The area and effectiveness of the Green Belt will be reduced. (See paragraph 4.3. 13 on page 10 of this Jetter.</td>
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### Comment ID: PSLPP16/7574  **Respondent:** 8933793 / Sally Novell  **Agent:**

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</table>

12. Policy D4: I OBJECT to the insetting of villages (meaning in fact, removal of villages from Green Belt protections) and the fact that they will suffer from higher density development and the resulting increase in traffic and use of infrastructure which is already under pressure. I object in particular to the insetting of West Clandon, Send and the Horsleys. This will have a detrimental impact on the openness of the Green Belt and the views in and out of the AONB in direct contravention of Policy P1 and P2.

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### Comment ID: PSLPP16/16057  **Respondent:** 8941761 / FLGCA (Paul Kassell)  **Agent:**

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Again we cannot support this policy due to the inexact wording. Developments “should have regard to”, should be replaced by “must”.

Old policies always stated that new developments would have to be “in character” with its surrounds – although more words are used, we feel the new definition is more vague.

On 15th June 2010 the Chief Planning Officer wrote in a letter that private residential gardens cannot be considered as “Previously Developed Land”. This should be articulated within this policy to prevent “Garden-Grabbing”

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### Comment ID: PSLPP16/17053  **Respondent:** 8944257 / Bruce Tindale  **Agent:**

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The University supports this policy, which sets out a series of criteria applicable to development in urban areas and inset villages that should be taken into account when formulating development proposals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp171/1201  Respondent: 8971745 / Catesby Estates Limited  Agent: Barton Willmore (Gavin Gallagher)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy D4 (Character and Design of New Development)
A series of design criteria have been added to Policy D4 which states that high quality design is expected in the Borough. Catesby support the Council’s ambitions to ensure that all development in the Borough is of a high quality design. Paragraph 56 of the Framework attaches great importance to the design of the built environment and states that good design is a key aspect of sustainable development, is indivisible from planning, and should contribute positively to making places better for people. Following on from this, paragraph 58 states local plans should develop robust and comprehensive policies that set out the quality of development that will be expected for the area. Catesby recognise the value and importance of good design and welcome the additional text in Policy D4.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13105  Respondent: 8993121 / Shelagh Yeomans  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy D4: Development in urban areas and inset villages

I OBJECT to this policy

In the case of urban development there are numerous flaws, including:

- The plan envisages that 40% of homes built will be affordable, but this does not provide any accommodation for low paid workers, for example, those on the minimum wage, who cannot afford to buy “affordable” homes, nor can they pay the so-called “affordable” rent. There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low paid workers such as those employed in the retail, warehousing and distribution sectors.
- The number of homes planned in the urban area is too low – there is a need for regeneration in some areas, but this is ignored and instead the plan concentrates on building homes on green field sites, which does not meet the needs for housing within the town, especially with the centre. This is not a sustainable policy as building outside the town has a disproportionate effect on road traffic.
- The plan envisages a large expansion of the traditional “bricks and mortar” retail sector, but this is a sector in long term decline.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<tr>
<th>Comment ID: PSLPP16/8683</th>
<th>Respondent: 9050337 / Nigel Geary</th>
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<td>I support this design policy, although not the proposal of Policy P2 to inset East Horsley from the Green Belt.</td>
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<th>Respondent: 9062913 / Susan Parker</th>
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POLICY D4 Development in urban areas and inset villages

OBJECT There are effectively two separate parts to this policy, both are flawed, and in the case on insetting, fatally flawed. In the case of urban development there are numerous flaws, including:

- The plan envisions that 40% of homes built will be affordable, but this does not provide any accommodation for low paid workers, for example, those on the minimum wage, who cannot afford to buy “affordable” homes, nor can they pay the so-called “affordable” rent. There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low paid workers such as those employed in the retail, warehousing and distribution sectors.
- The number of homes planned in the urban area is too low – there is a need for regeneration in some areas, but this is ignored and instead the plan concentrates on building homes on green field sites, which does not meet the needs for housing within the town, especially with the centre. This is not a sustainable policy as building outside the town has a disproportionate effect on road traffic.
- The plan envisions a large expansion of the traditional “bricks and mortar” retail sector, but this is a sector in long term decline.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/7067</th>
<th>Respondent: 9094753 / D Jones</th>
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<td>I OBJECT to Policy D4 - Development in urban areas and inset villages</td>
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The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy D4: Development in Urban Areas and Inset Villages

Paragraph 86 of the NPPF sets out the principles by which it should be decided whether villages are to be inset or not, and that issue is covered in my response to Policy P2 above.

However, there is a consideration in connection with this Policy D4 that appears to have been missed. Villages that are currently proposed for inseting, have been subject to Green Belt protection for very many years, and as a result they exhibit a character that is altogether different from urban areas, and from other non-Green Belt settlements. NPPF 86 recognises that having been inset, the character of a villages still needs to be protected, and it suggests that “other means should be used, such as conservation area or normal development management policies”. Given that inset villages exhibit a specific character as a result of their former Green Belt protection, it is clearly appropriate to consider formally whether they should be reviewed in terms of extending their conservation areas and/or instituting specific development management policies that cater for this particular situation. I can find no indication that such options have been considered, but clearly this needs to be done otherwise the character of former Green Belt villages will be irrevocably degraded. I therefore OBJECT to this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Partly SUPPORT / partly OBJECT

Paragraph 4.5.49b sets out a position on public art. At a time when the UK has a large shortfall of housing supply against growing demand, I strongly object to funds being channelled into public art instead on helping to solve the problem.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

D4 - Development in inset villages:

I generally support this policy on a sustainable development basis as before discussed, and in particular the designation of West Horsley as an inset village.
However, the special character of West Horsley, with its north and south settlements either side of the railway line, needs to be looked at carefully to make the most of this opportunity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attended documents:

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Comment ID: PSLPP16/10569  Respondent: 10299041 / F McHugh  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY D4

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attended documents:

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Comment ID: PSLPP16/7139  Respondent: 10443489 / Vincent Withams  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Our local village of Fairlands is open to development. We need protection from inappropriate local planning. Garden grabbing stipulated by the government should not form part of the local plan but this is exactly what could happen

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attended documents:

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Comment ID: PSLPP16/12680  Respondent: 10619169 / Wendy Critchlow  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8236  Respondent: 10662849 / Garry Walton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY D4 - Development in urban areas and inset villages

I OBJECT. This is a piously aspirational policy that does not address any of the obvious practical issues already touched on above:

The plan envisages that 40% of homes built will be “affordable”, but this does not provide any accommodation for low-paid workers, for example, those on the minimum wage, who cannot afford to buy so-called “affordable” homes or pay an “affordable” rent. There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low-paid workers such as those employed in the retail, warehousing and distribution sectors (all of which this plan aspires to expand).

The number of homes planned in the urban area is too low. There is a glaring need for regeneration in many urban areas, but this is ignored in favour building homes on green-field sites instead. This will not meet urban housing needs. It is also unsustainable, since building outside the town does disproportionate harm to road traffic, air quality and overstretched infrastructure.

The plan envisages a large expansion of the traditional “bricks and mortar” retail sector, but this is a sector in rapid and continuous decline.

All the stated policy aims for “inset” villages will be negated by the sheer weight of new housing development proposed which would radically change their character forever. Against this disruptive background, it is barely relevant to talk about preserving views!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12260  Respondent: 10765249 / Andy & Sonja Freebody  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12610  Respondent: 10769121 / Ali Elson  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY D4

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13617  Respondent: 10773441 / Barry Marshall  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.
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The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

I OBJECT TO POLICY D4 (DEVELOPMENT IN URBAN AREAS AND INSET VILLAGES)

• No commitment to expand social housing or accommodation for people who can’t afford so-called affordable homes.
• Not enough new homes in urban areas, despite demand and need for urban regeneration and protection of Green Belt.
• Objectives for inset villages cancelled out by plans for excessive housing growth there.
• Too much emphasis on traditional shops, when a lot of this sector is in terminal decline.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

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<table>
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<tr>
<th>Comment ID: PSLPP16/843</th>
<th>Respondent: 10798049 / Steve &amp; Maureen Knight</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4</td>
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</table>

Object – I do not support major development in our villages. Our villages must not be inset but 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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<th>Comment ID: PSLPP16/344</th>
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POLICY D4 Development in urban areas and inset villages

OBJECT There are effectively two separate parts to this policy, both are flawed, and in the case on insetting, fatally flawed. In the case of urban development there are numerous flaws, including:

- The plan envisages that 40% of homes built will be affordable, but this does not provide any accommodation for low paid workers, for example, those on the minimum wage, who cannot afford to buy “affordable” homes, nor can they pay the so-called “affordable” rent. There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low paid workers such as those employed in the retail, warehousing and distribution sectors.
- The number of homes planned in the urban area is too low – there is a need for regeneration in some areas, but this is ignored and instead the plan concentrates on building homes on green field sites, which does not meet the needs for housing within the town, especially with the centre. This is not a sustainable policy as building outside the town has a disproportionate effect on road traffic.
- The plan envisages a large expansion of the traditional “bricks and mortar” retail sector, but this is a sector in long term decline.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/18390</th>
<th>Respondent: 10799169 / Neal Basson</th>
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OBJECT There are effectively two separate parts to this policy, both are flawed, and in the case on insetting, fatally flawed. In the case of urban development there are numerous flaws, including:
• The plan envisages that 40% of homes built will be affordable, but this does not provide any accommodation for low paid workers, for example, those on the minimum wage, who cannot afford to buy “affordable” homes, nor can they pay the so-called “affordable” rent. There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low paid workers such as those employed in the retail, warehousing and distribution sectors.

• The number of homes planned in the urban area is too low – there is a need for regeneration in some areas, but this is ignored and instead the plan concentrates on building homes on green field sites, which does not meet the needs for housing within the town, especially with the centre. This is not a sustainable policy as building outside the town has a disproportionate effect on road traffic.

• The plan envisages a large expansion of the traditional “bricks and mortar” retail sector, but this is a sector in long term decline.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17541  Respondent: 10799425 / Guildford Greenbelt Group (Susan Parker)  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We object to policy D4 Development in urban areas and inset villages

Summary

There are effectively two separate parts to this policy, both are flawed, and in the case on insetting, fatally flawed. In the case of urban development there are numerous flaws, including:

• The plan envisages a large expansion of the traditional “bricks and mortar” retail sector, but this is a sector in long term decline.

• The plan envisages that 40% of homes built will be affordable, but this does not provide any accommodation for low paid workers, for example, those on the minimum wage, who cannot afford to buy “affordable” homes, nor can they pay the so-called “affordable” rent. There is a great need for an expansion in social housing, especially in urban areas, where there is a greater concentration of low paid workers such as those employed in the retail, warehousing and distribution sectors.

• The number of homes planned in the urban area is too low – there is a need for regeneration in some areas, but this is ignored and instead the plan concentrates on building homes on green field sites, which does not meet the needs for housing within the town, especially with the centre. This is not a sustainable policy as building outside the town has a disproportionate effect on road traffic.

In the case of insetting, the policy is fatally flawed, for two separate reasons.

• Firstly, it is based on an erroneous assumption. GBC justify the policy (in para 4.5.50) by suggesting, without any supporting data, that development in villages washed over by the green belt is at a lower rate than within Guildford town. This is not the case, and statistics from the ONS censuses of 2001 and 2011 show that this is assumption is incorrect. These statistics show that the growth rate in housing was higher in, for example, Effingham, a village washed over by the green belt than Merrow, a suburb of Guildford which is not washed over by the green belt. In fact, the rate of increase in housing stock in Effingham was faster than the average for the borough.

• Insetting has been based on the assumptions set out in the Green Belt and Countryside Study, but this is not referred to as part of the Evidence base. The analysis in this document was flawed to the extent that it is
valueless. It has serious flaws in its methodology, includes subjective judgements, and thus its conclusions are flawed. These flaws are so serious that it should be removed from the evidence base that supports the Local Plan. However, removing the reference but retaining the decision process means that the decisions are based on flawed assumptions.

**Urban development**

There is a fundamental flaw in the draft Local Plan, in that there are not enough dwellings planned in urban areas, in particular, Guildford town centre. This is where the demand for affordable homes is most acute, a fact which is recognised in much of the draft Local Plan. Yet the plan then envisages that most dwellings will be built outside the urban area, so there is no continuity in the plan – if the demand for affordable homes is most acute within the town, then is where these dwellings should be built. There are sites available, for example, various sites in Woodbridge Meadows, Walnut Tree Close (including the area around the station) and North Street. Yet the focus in these areas is to provide a very limited number of dwellings, with the emphasis on additional retail space and more commercial premises. Given the profound changes in traditional retail, this is not a sustainable policy. There have been many examples of bankruptcies amongst traditional retailers, the most recent examples being BHS and Austin Reed, and previously Woolworths, Comet, etc. The British Retail Consortium forecast that by 2020 up to one third of those now employed in traditional retail could lose their jobs, due to a combination of the move to the internet and higher costs, from business rates and increases in the minimum wage. Recent figures show that online sales are still growing quickly, with more than 13% of total retail sales now made over the internet. Nor does an expansion in traditional retail chime with the objective of attracting highly paid jobs to the area – the majority of jobs in retail are low paid, with zero hours contracts and usually a pay rate based on the minimum wage. So any expansion in traditional bricks and mortar retail would create a greater demand for affordable and social housing – exactly the reverse of what is needed.

Even the major grocery retail chains have been affected by changes in retail habits – Tesco, Sainsburys, Morrisons, etc are closing some stores, with no major large stores planned. Banks and other financial institutions are still closing some branches, so changes in town centres still have some way to go – but none of these changes are recognised in the draft Local Plan, which envisages no limit to traditional retail.

There is another reason why the retail sector is unlikely to exhibit long term growth, and this is consumer debt, which has reached a level that the Bank of England have said could contribute to economic stability. This is likely to have a greater destabilising effect in the event of an economic downturn – and there will certainly be at least two of these during the life of the Local Plan. Retail spending simply cannot be maintained indefinitely at its current rate, and to plan for a large increase in consumer spending is irresponsible.

So there has to be a reappraisal of the urban development plans, with more homes provided in urban areas, in particular in the centre of Guildford, before there is any consideration of building outside the urban area. These are not separate policies to be considered separately, but hang together as part of a holistic plan. As the council own many sites in the centre, these could be made available for development within the first 5 years of the plan, with mixed housing on these sites, including new social housing, which is sorely needed. Affordable housing is simply not affordable to anyone on the minimum wage, there is a need for a considerable expansion of social housing, a need that is not adequately recognised in the draft Local Plan.

In the detail of Policy D4, it suggests that in urban areas and inset villages planning permission will be granted provided that a proposed development:

- “Ensures that the layout, scale, form, massing, height of buildings and structures, and materials relate to the site context and its surroundings;”.....

There are several other criteria listed and the Policy then goes on to elaborate criteria specific to inset villages, as follows:

“In addition to the above, proposals for new development within inset village areas will have particular regard to:

- The distinctive settlement pattern of the village and the important relationship between the built development and the surrounding landscape;
- Important views of the village from the surrounding landscape;
• Views within the village of local landmarks.”

There are numerous development sites proposed that mean that the first criterion cannot be met, as the developments proposed do not relate to the scale, form or massing of the site surroundings. For example, in West Horsley and East Horsley, there are numerous sites where this does not apply. It is proposed that a total of 3.6 km² should be removed from the green belt, with a total of 533 houses proposed on sites in East and West Horsley on a total of 29.1 ha, an average density of 18 dwellings/ha. These proposed developments are not in scale or proportion to the existing villages, and the housing density is considerably higher than existing housing density. Effectively, if these developments were to proceed, East and West Horsley would merge and become a large urban area in the green belt, totally different in character to the existing villages, with the existing settlement pattern completely lost. Similar considerations apply to other proposed development sites, such as Flexford and Normandy. In this case, 1.3 km² would be removed from the green belt and a total of 1100 dwellings proposed on 67 ha, with an average density of 16.4 dwellings/ha. Again, the scale and form would overwhelm existing hamlets and villages, merging these to form another urban area in the heart of the green belt, with no consideration of the views of the settlements from the surrounding countryside, much of which has been given AONB status.

Thus the words of the policy statement D4 do not match the proposals contained in the draft local plan.

The “Reasoned Justification” for the policy consists of five paragraphs, 4.5.48 to 4.5.52. Of these, 4.5.48 and 4.5.49, 4.5.51 and 4.5.52 are not justifications for the policy, they are simply statements or further information. Paragraph 4.5.50 is the only attempted justification for this policy, but in fact this applies only to insetting. Paragraph 4.5.50 is factually wrong and so the justification for this policy does nor bear close examination. Parts of this paragraph are taken in turn below, to show the inaccuracies this paragraph contains.

“Historically, development has been focused in the urban areas of Guildford, and Ash and Tongham only. Development in the villages has been very limited due to the Green Belt designation which previously washed over all but one of the villages.”

This depends on how development is measured. In terms of raw numbers, this may be true, but this would ignore the fact that urban area of Guildford town contains much of the housing in the borough. Taking the increase in housing stock between the censuses of 2001 and 2011 in a specific wards reveals a much more complex picture. The village and ward of Effingham, for example, had a higher rate of adding dwellings than the average for the borough and for at least some of the Guildford urban wards. Using census data collected by the ONS, between 2001 and 2011, the number of dwellings in Effingham increased by 6.6%, whereas for the borough as a whole it increased by 5.0%. Over the same period in Merrow, a ward within the urban area of Guildford, the number of dwellings increased by only 1.2%, whilst in Normandy ward the increase was 2.6%. This analysis has not been exhaustive, but it is sufficient to show that the opening statement in paragraph 4.5.47 is incorrect, and that in some cases, proportionally, considerably more development has occurred in green belt villages. It must be incumbent on GBC to assess the facts before making false statements such as this. Opinions are not facts. ONS statistics are open to all.

In the first three months of 2016, planning applications for 11 additional dwellings in Effingham have been made, in a village of approximately 525 dwellings. One of these applications has been reduced from 6 to 4 dwellings, whilst the other 5 have been approved. This shows clearly that development within villages washed over by the green belt can occur, and that organic growth is possible. There is no necessity for insetting.

“Fifteen villages are now inset from the Green Belt meaning that development is no longer, by definition, considered inappropriate”.

Guildford’s Green Belt boundaries were established in the Guildford Borough Local Plan 1987, so are well established. There has not been any justification for the extensive green belt review that accompanies the insetting of villages, or for the removal of these villages from the green belt. According to the NPPF, paragraph 83, green belt boundary changes should be made only in exceptional circumstances, as follows

“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.”

No exceptional circumstances have been demonstrated, with none given as justification in Policy D4 for the policy of insetting. Proposed green belt boundary changes are on a very large scale, as it is proposed to remove more than 6% of the existing area designated as green belt, and to create new green belt boundaries extending to more than 105 km. This is not a simple revision to the green belt, and a demonstration of exceptional circumstances is required for each change. This has not been done, not for a single proposed change.

Although Guildford Borough Council are in the process of producing a new Local Plan, this in itself is not enough to change Green Belt boundaries; the requirement to demonstrate exceptional circumstances still applies. According to a High Court judgement, Gallagher vs Solihull, issued March 30th, 2014, Case No. CO/17668/2013, there is still a requirement to prove exceptional circumstances – quotations below are from paragraph 125 of this judgement:

“However, it is not arguable that the mere process of preparing a new local plan could itself be regarded as an exceptional circumstance justifying an alteration to a Green Belt boundary. National guidance has always dealt with revisions of the Green Belt in the context of reviews of local plans….. and has always required “exceptional circumstances” to justify a revision. The NPPF makes no change to this.”

“Exceptional circumstances are required for any revision of the boundary, whether the proposal is to extend or diminish the Green Belt.”

Whilst each case is fact-sensitive and the question of whether circumstances are exceptional for these purposes requires an exercise of planning judgment, what is capable of amounting to exceptional circumstances is a matter of law, and a plan-maker may err in law if he fails to adopt a lawful approach to exceptional circumstances. Once a Green Belt has been established and approved, it requires more than general planning concepts to justify an alteration.

Each and every proposed change to the green belt boundary requires that exceptional circumstances be demonstrated, otherwise the changes are not lawful. This has not been done by GBC, not for any proposed change.

From paragraph 130 of this judgement

“In other words, something must have occurred subsequent to the definition of the Green Belt boundary that justifies a change. The fact that, after the definition of the Green Belt boundary, the local authority or an inspector may form a different view on where the boundary should lie, however cogent that view on planning grounds, that cannot of itself constitute an exceptional circumstance which necessitates and therefore justifies a change.”

“…..That, in his judgment, may now be so: but that falls very far short of the stringent test for exceptional circumstances that any revision of the Green Belt boundary must satisfy. There is nothing in this case that suggests that any of the assumptions upon which the Green Belt boundary was set has proved unfounded, nor has anything occurred since the Green Belt boundary was set that might justify the redefinition of the boundary.”

No changes that would warrant an alteration to green belt boundaries have been demonstrated by GBC, their so called “sensitivity analysis” is shallow and subjective, and changes that may have occurred since the boundary was established was discussed. The changes proposed do not meet the standards set in this judgement. Instead, GBC maintain that it is housing need that creates blanket exceptional circumstances for changes proposed to the green belt. However, this is not the case. Following a meeting with local councillors and MPs in early 2014, Nick Boles wrote to Anne Milton MP to clarify the issue of exceptional circumstances and in this letter said:

“The written Ministerial Statement of 1 July 2013 set out the Government’s concern that some recent planning decisions have not accorded the Green Belt the level of protection that was the explicit policy intent of Ministers. It made clear that the single issue of unmet need – whether for conventional housing or for travellers sites – 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.”
These quotations show that the insetting process has considerable hurdles to overcome, including as it does the revision to Green Belt boundaries that accompanies insetting. Thus the most important questions are – did the flawed Pegasus “Guildford Borough Green belt and Countryside Study” show unequivocally that villages to be inset are not open villages, making no or a minimal contribution to the openness of the Green Belt; and that there were exceptional circumstances (other than unmet housing need) that justify a change to the Green Belt, creating a new boundary around all these villages – more than 105 km of new boundary? The Pegasus study did not do this, and this was just one of its many flaws (cf Annexe)

As shown above, development has occurred within villages, and the NPPF made it easier for additional development to take place within the green belt, via the provisions of paragraph 89, which specifically makes it easier for limited infill to occur and on a larger scale, for affordable housing to be built within villages washed over by the green belt. These provisions came into effect in 2012, when the NPPF was adopted and so the rate of increase in housing within villages is very likely to increase beyond that observed in the period between the 2001 and 2011 censuses.

It is clear from the most recent figures for planning applications to GBC in 2016 in Effingham that the pace of development within villages is changing, even with continued green belt protection. There is no requirement for insetting villages within the green belt, and the desire to increase development within the villages is not an adequate basis for insetting.

The final part of paragraph 4.5.47 is

“In accordance with national policy, the important character of these inset villages should instead be protected using other development management policies”.

This is not national policy, national planning policy is provided by the NPPF, and paragraph 86 of the NPPF is the relevant paragraph, 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, 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.”

There is thus no national policy that requires insetting. Instead, a judgement should be made for each village based on its contribution to the openness of the green belt. In fact, many of the villages proposed for insetting exhibit an open pattern of development, and so make an important contribution to the openness of the green belt, for example, Effingham. This has not been considered, other than in the flawed Pegasus report, and the examination of their approach reveals how this analysis was flawed. No further consideration has been given by GBC, and so GBC’s policy of wholesale insetting does not accord with national policy, as claimed.

In itself, there are many issues with insetting, and these include:

- According to the previous draft of the Local Plan, subject to the Regulation 18 consultation during summer 2014, insetting is based largely on the findings of the Pegasus study, “Guildford Borough Green Belt and Countryside Study. This report was very poor and various parts of the study criticised by many, including some borough councillors. It is perverse to continue with any recommendations of this study. In particular, a detailed review of this report for Effingham village showed that it was inaccurate and subjective.
- The settlement hierarchy was also subject to a detailed review and again this showed that scoring methods used were inaccurate and subjective.
- Boundary changes are arbitrary, without an adequate detailed survey. There are no checks and balances to this, even though the positioning of the line can change the price of an acre of land from about £15,000 to over £1 million. There is no process to it, simply someone using a computer and a mouse – literally a mouse click can turn some land owners into millionaires. In some cases, the proposed boundary divides semi-detached houses, so that one is still inside the green belt and the other outside. In other cases, the boundary divides gardens, so that part of a garden is in, part out of the green belt. Due care and attention has not been given to producing proposed boundaries.
• In many cases, boundaries proposed do not comply with the requirements of the NPPF, which is given in the NPPF, paragraph 85, final bullet point, which states

“define boundaries clearly, using physical features that are readily recognisable and likely to be permanent”.

Given this NPPF definition, treelines, hedgerows, woodlands, etc should not be considered as potential Green Belt boundaries. In fact, in some cases proposed boundaries cross open fields, with no discernible features whatsoever. These are entirely inappropriate as a green belt boundary.

It should also be noted that GBC implicitly recognise that insetting is likely to lead to more development within villages on sites that are not identified in the draft Local Plan. But there is no recognition of this in the housing target. As is noted, insetting would mean that the rate of windfall development would increase, but GBC have not provided a proper analysis of windfall development (such as that provided by Mole Valley District Council) and they have failed to recognise a higher rate of windfall development in showing how the housing target will be met – even though, via Policy D4, they are planning for it. Windfalls should be deducted from the housing target, and the need for additional sites would thus be substantially reduced. Windfall development should be properly assessed and identified within the housing target, with an appropriate increase in the rate of windfalls in any villages that are inset.

THE BROWNFIELD OPPORTUNITY

Yes, we need a new Local Plan for our borough in order to provide a development strategy within which we can accommodate our local housing, economic and environmental needs. But first we must make 100% use of our urban brownfield before we consider building in the Green Belt or countryside. Paragraph 80 of the NPPF clearly states that Green Belt serves a key purpose, “to assist in urban regeneration, by encouraging the recycling of derelict land and other urban land”. In order to comply with central planning policy we need a brownfield strategy that states clearly. “We are committed to a brownfield first initiative whereby all applications on previously developed land are given fast track priority and every facility to promote development for residential purposes and employment purposes in order to satisfy the needs of local people. In parallel a zero CIL incentive should be given for all residential development on brownfield land. In response to the detailed objections received in the Regulation 18 process of the 2014 Local Plan and also in accordance with government policy a Guildford brownfield land register should be urgently compiled showing address, ownership, occupier, current use and detailed planning brief. A head of brownfield should be appointed at GBC with a clear briefing to deliver brownfield targets of housing and employment space. GBC needs to accelerate the residential redevelopment at Woodbridge Meadows, Walnut Tree Close and the Station within the next 5 years. GBC needs to examine the residential development opportunity of the 25.7 acres of car parks in GBC ownership. We do not consider that the target of 1,172 homes in the town centre takes account of the need and demand for housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town which will in itself help to sustain the retail core by increased economic impact. The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015 which has recently been adopted by GBC. The reality is that the Town Centre has the capacity for at least 5,000 homes. The additional target capacity of 5,000 could easily be provided within the following urban sites which have the capacity for 7,500 homes:

• 2,500 homes detailed in Masterplan 2015 including Woodbridge Meadows which can itself be increased substantially
• 500 homes at North Street
• 1000 homes on current GBC car parks (25 acres) and at the station
• 1000 homes saved in the urban area if 100% of students are accommodated on Surrey University campus (17 ha of car parks)
• 1000 homes at Slyfield on the 40 ha regeneration site
• 1000 windfall infill (50 per annum)
• 500 homes on brownfield sites in villages on sites of max 1ha which do not impact Green Belt

Annexe in relation to Green Belt Study:

Critique Update: Revisions to Green Belt and Countryside Study
Changes to this volume (Volume IV, which deals with insetting of villages) were made because of earlier criticisms of the study, particularly with regard to Effingham. Changes were summarised as follows:

- "Re-consideration of how woodland / tree belts etc impact upon openness of the villages in Green Belt terms;"
- "Reference has been removed to the specific development footprint calculations, due to the complication previously generated in the interpretation of such data; and"
- "Re-consideration of the appropriateness of insetting Effingham, due to part of the settlement lying in adjoining authorities."

In this revised version, a three stage approach was still used and the stages were given as:

"Stage 1: Assessing the degree of openness within each village through analysis of urban form, density and the extent of developed land;"

"Stage 2: Assessing the surroundings of, and potential new Green Belt boundaries at each village within Guildford Borough; and"

"Stage 3: Assessing the suitability of each village for insetting within the Green Belt and defining potential Green Belt boundaries."

There is a very slight change to the wording of Stage 2, but no change of any substance to these 3 stages between the original and the revised version. However, in this new version the only reference to the previous method used in stage 1 was to justify the removal of

"the specific development footprint calculations, due to the complication previously generated in the interpretation of such data."

The only complication was created by Pegasus using the data they generated in a bizarre way. As the previous critique showed Pegasus was interpreting their data incorrectly, so they have simply dropped any reference to it. However, this was at least an attempt to show objectivity in their methodology. This means that the entire revised process became subjective and opaque. As this is such a controversial and important topic – the removal of villages from the green belt - this type of methodology is simply not acceptable. The data that was previously generated pointed towards different conclusions from the conclusions drawn by Pegasus – and this was probably the real reason for the data being excluded in a revised report.

A fair and robust methodology would ensure that anyone else performing the same task would get the same or very similar results, and this is best achieved by using objective methods that are visible and transparent. However, if different independent groups were set the same assignment using the methodology employed by Pegasus, because of the subjective nature of the tests, it is highly unlikely that the same conclusions would be reached. For an undertaking of such importance, the methodology used was entirely inappropriate and so the results from this study are unacceptable. It is notable that although the methodology changed, the outcomes were exactly the same, and this gives rise to the suspicion that results were predetermined. Instead of changing the method used in Stage 1 so that it became entirely subjective it would have been much better to tweak the methodology behind the data that was generated, to ensure it was objective and robust, and then to use data produced to provide an appropriate categorisation of villages, using results impartially. This they did not do, as it would have shown some of the villages being considered should not be removed from the green belt.

Although Pegasus claimed the methodology was changed, previous results have not changed – in other words, their conclusions have not changed. Consequently, the criticism of the methodology previously used still stands. Methodology used in Stages 2 and 3 has not changed and the previous critique is still valid for these stages.

The “new” methodology for Stage 1 in this later issue of Volume IV is discussed below.
The map used to illustrate this is exactly the same as that previously produced, with the same areas marked out, so it is not reproduced here – it is in the earlier critique. In this stage Pegasus use (as before) the concept of “perceived” village area, to justify the inclusion in the “perceived” village area of housing that is in Mole Valley – but they have not included any open areas such as Rolls Farm to be within the “perceived” village area. In fact, their concept of perceived village area is one that would be created only by viewing the area from space, or using aerial maps without boundary markings, with a determination to include as many buildings and as little open farmland as possible. On the ground, the boundary between Guildford Borough and Mole Valley is clearly marked, along the A246. So “perceived village area” is clearly a very subjective concept.

In this revised report, Pegasus have attempted to justify their sub division of areas into high, medium, low housing densities, as well as open areas, and their definitions are given below, with relevant paragraph numbers:

“13.13 Through site survey, aerial imagery and detailed OS base mapping at 1:5000 scale, areas of high, medium and low development density were identified within the village area. Such categorisation assumes development associated with a village, rather than other areas, so for example, high density areas identified would not be classed as high density within a town or city environment. The areas were defined as follows:

- **High Development Density** – generally includes areas of flats, terrace, detached, semi-detached or singular buildings within densely distributed clusters with enclosed street frontages, small scale garden plots enclosed by fencelines, hedgerows and other buildings. Built development forms the dominant characteristic;
- **Medium Development Density** – generally includes areas of detached, semi-detached or singular buildings within closely distributed clusters within medium scale garden plots, small holdings, open spaces or small fields. Built development is the prevalent characteristic interspersed with visible open areas; and
- **Low Development Density** – generally includes singular detached buildings that are sparsely distributed within large garden plots, country estates or open farmland. Open areas form the dominant characteristic interspersed with infrequent buildings.

**13.14** Once areas of high, medium and low development density had been mapped, detailed comments regarding village form, density and openness were identified and annotated on the Stage 1 assessment map using a 1A, 1B, 1C, etc prefix.”

Pegasus persisted in not providing a numerical guide to housing density, which would be a normal approach when attempting to classify densities. This means they can classify areas in any way they see fit, without regard to actual densities. They have deliberately chosen not to use an objective approach, which would be numerical. This is evidence for an approach with a predetermined outcome – Pegasus avoided using numerical data even when it is a standard approach for this type of analysis.

However, an analysis of several areas will serve to illustrate the nonsense in their application of this classification – some analysis was given in the earlier critique and this is still valid, but more details are given below, starting with the first area, 1A, described as

“High density two storey detached residential development located on Effingham Common Road within medium to large scale garden plots enclosed by Thorne Wood to the east.”

**Figure 1. Area 1A “High Density” Housing on Effingham Common Road**

The Google earth snip shows that this description is a fantasy – the houses are not enclosed by Thornt Wood, Thornt Wood is 190m approximately north from the end house of the 6 houses. The boundary to the west is Effingham Common Road with the end house (Meadow Cottage) facing the rear garden of the first house in Leewood Way. To the north is open farmland, bordered by Thorne Wood, 190m approximately north of the other end house, Terriston. To the east is open farmland, Effingham Lodge Farm. To the south is St Lawrence playing field and another field, all open and undeveloped. The single storey St Lawrence school building is 183m to the south.

The actual density is easily calculated. The 6 houses are set in an area of 1.73 acres (0.7 ha) so the calculated density is 3.5 houses/acre, or 8.6 dwellings/ha. Under no circumstances could this be considered as high density, or as enclosed. The description provided by Pegasus was inaccurate and can best be described as a fantasy, developed to ensure a predetermined conclusion was reached.
Area 1K. “High density two storey detached and semi residential development located on Orchard Gardens, Mount Pleasant, Norwood Road, Norwood Close, Strathcona Avenue, Woodlands Road and Links Way. Properties located within small scale garden plots enclosed by fencelines, hedgerows and buildings.”

Figure 2. Area 1K: “High Density” Housing

The area shown is 23.9 ha, 59.1 acres, and has approximately 434 buildings in total, predominantly residential but including several commercial buildings. Thus the density is 18.2/buildings ha, or 22.7/acre. This density is lower than being put forward in Effingham’s Neighbourhood plan by the Parish Council, and much lower than developments in villages given planning permission by GBC during 2013/14, at 71 dwellings/ha. So although high by comparison to most of the rest of Effingham, density in this area would be considered low to medium by current standards. The highest housing density in the Berkeley Homes proposal was 31.2 dwellings/ha, and this was described as low density.

The north eastern boundary of this area is the A246, but across that road are the open areas of Browns Field, King George V playing fields and recreation area, as well as (to the west) an open field on Rolls Farm. The southern boundary is open farmland, and the western boundary Effingham golf course. This means that even in this area, there is a sense of openness and connection with the green belt beyond the village, which is obvious in the Google earth snip given in Figure 2.

Note the disparity between these two areas, both described by Pegasus as high density – in area 1A, the actual density is 8.6/ha but in 1K is 18.2/ha. Even in their contrived categorisations Pegasus were not consistent.

Finally, a third area, to further illustrate how poor and subjective this analysis was – area 1I, housing on Manorhouse Lane.

Area 1I “Medium density single and two storey detached residential development on Manorhouse Lane with medium to large scale garden plots enclosed by hedgerows and treebelts to the east of King George V playing fields.”

There are 8 houses in this area, an area of 1.53 ha, 3.8 acres, so that the density is 5.2 houses/ha, or 2.1/acre. Pegasus would have had to come from a strange parallel universe to believe that this could be described as medium density housing. To the north, the boundary is a hedge beyond which is the extensive gardens of Manor House school; to the east the boundary King George V playing fields. Spring gales showed just how fragile the treeline in this (and other areas) is – one tree was taken down by the gale and another felled as it was unsafe. To the west is the lane, and beyond the lane, open farmland. The short southern boundary is the A246. So this area is not enclosed, there is a very strong connection to the open green belt beyond the houses – and their hedges.

Figure 3 “Medium Density” Housing on Manorhouse Lane

Of the 14 areas defined on their stage 1 map, Pegasus identified 3 as high density – but again without any numerical definition of high density. Analysis above shows how misplaced these definitions were. 7 areas were classed as medium density – and again, an example above shows how misplaced these were. Three areas were classed as low density, and just one as open farmland. Note that Browns Field and King George V playing fields were classed as low density. A detailed analysis of all areas should not be needed to show that in many cases (if not all) the categorisation was wrong. But in the parallel universe occupied by Pegasus, three areas defined as high density were enough to decide that the whole of the perceived village area exhibited a high density of development. This was a conclusion that even George Orwell’s Ministry of Truth would have found questionable.

It was wrong because Pegasus had an outcome in mind, and mere facts were not going to prevent their fixed conclusion from being reached.

In the Stage 3 insetting criteria, the only change was that the reference to the calculation of the built area was dropped, no doubt because this was clear evidence of bias in their analysis. No other changes were made, so that the “score” remained the same – one plus and two negatives for Effingham, so they were able to reach the conclusion that Effingham should be inset. Pegasus did inset a suggestion that this should be done only after consultation with the neighbouring Local Authority, Mole valley District Council. No notes of any such meeting have been provided.
The actual position remains the same as in the earlier critique – Effingham is an open village, with a great deal of open space within the village. There are strong connections to the green belt beyond the village and so the village makes an important contribution to the openness of the green belt.

In reaching the conclusion that Effingham should be inset, Pegasus had to totally ignore reason and fact, and produced a report that was shameful in its bias. It is highly likely that this same bias was evident when recommending other villages should be inset into the green belt, so that the real contribution other villages make to the openness of the green belt is unknown. Preconceptions throughout this report are evident, and the kindest thing that can be said about it is that its determination to ignore facts in order to reach the destination of fixed conclusions is heroic. However, it is a discreditable report, and it should have no place in the Evidence Base that informs the Local Plan process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13281  Respondent: 10803809 / David Jones  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. Policy D4: I object to the insetting of villages (meaning in fact, removal of villages from Green Belt protections) and the fact that they will be suffer from higher density development and the resulting increase in traffic, use of infrastructure which is already under pressure. I object in particular to the insetting of West Clandon, Send and the Horsleys. This will have a detrimental impact on Green Belt openness and the views in and out of the AONB in direct contravention of Policy P1 and P2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/833  Respondent: 10804961 / M. Basson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

OBJECT There are effectively two separate parts to this policy, both are flawed, and in the case on insetting, fatally flawed. In the case of urban development there are numerous flaws, including:

- The plan envisages that 40% of homes built will be affordable, but this does not provide any accommodation for low paid workers, for example, those on the minimum wage, who cannot afford to buy “affordable” homes, nor can they pay the so-called “affordable” rent. There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low paid workers such as those employed in the retail, warehousing and distribution sectors.
- The number of homes planned in the urban area is too low – there is a need for regeneration in some areas, but this is ignored and instead the plan concentrates on building homes on green field sites, which does not meet the needs for housing within the town, especially with the centre. This is not a sustainable policy as building outside the town has a disproportionate effect on road traffic.
• The plan envisages a large expansion of the traditional “bricks and mortar” retail sector, but this is a sector in long term decline.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

1. **POLICY D4**

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to POLICY D4 - Development in urban areas and inset villages

- No commitment to expand social housing or accommodation for people who can’t afford so-called affordable homes.
- Not enough new homes in urban areas, despite demand and need for urban regeneration and protection of Green Belt.
- Objectives for inset villages cancelled out by plans for excessive housing growth there.

- Too much emphasis on traditional shops, when a lot of this sector is in terminal decline.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1.4 The number of homes planned in the urban area is much too low. There is a glaring need for regeneration in many urban areas, particularly Guildford Town Centre but this is ignored in favour of building homes on green-field sites instead.

1.5 This will not address urban housing needs. It is also unsustainable, since building outside the town does disproportionate harm to road traffic, air quality and overstretched infrastructure.

1.6 The plan envisages a large expansion of the retail sector, but this is a sad voice from the past because the sector is in rapid and continuous decline.

1.7 All the stated policy aims for “inset” villages will be negated by the excessive weight of new housing development proposed which would radically change their character forever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7185  Respondent: 10854113 / Sarah Pickering  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

WE OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages, which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionally.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14653  Respondent: 10857249 / Alice Pashley  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionally.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8856  Respondent: 10857889 / William Kyte OBE  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to this policy

There are effectively two separate parts to this policy, both are flawed, and in the case on insetting, fatally flawed.

There is a need for expansion in social housing, especially in urban areas, where there is a greater concentration of low paid workers such as those employed in the retail, warehousing and distribution sectors.

The number of homes planned in the urban area is too low. There is a need for regeneration in some areas, but this is ignored and instead the plan concentrates on building homes on green field sites. Over cramming and alien high-rise developments in the town must be avoided

The plan envisages a large expansion of the traditional retail sector, but this is a sector in long term decline, which will continue to accelerate with the growth in online shopping.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11658  Respondent: 10858753 / Carole Warren  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object due to the negative impact on character of the area

The plan will have a harmful and detrimental impact on the area, impacting the character of the area and villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18608  Respondent: 10858977 / Angela Otterson  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to policy D4 Development in urban areas and inset villages

This policy that does not address the opportunity for building in the urban area

The plan envisages that 40% of homes built will be “affordable”, but this does not provide any accommodation for low-paid workers, for example, those on the minimum wage, who cannot afford to buy so-called “affordable” homes or pay an “affordable” rent. There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low-paid workers such as those employed in the retail, warehousing and distribution sectors (all of which this plan aspires to expand).

The number of homes planned in the urban area is much too low. There is a glaring need for regeneration in many urban areas, particularly Guildford Town Centre but this is ignored in favour of building homes on green-field sites instead.

This will not address urban housing needs. It is also unsustainable, since building outside the town does disproportionate harm to road traffic, air quality and overstretched infrastructure.

The plan envisages a large expansion of the retail sector, but this is a sad voice from the past because the sector is in rapid and continuous decline.

All the stated policy aims for “inset” villages will be negated by the excessive weight of new housing development proposed which would radically change their character forever.

THE BROWNFIELD OPPORTUNITY

Yes, we need a new Local Plan for our borough in order to provide a development strategy within which we can accommodate our local housing, economic and environmental needs. But first we must make 100% use of our urban brownfield before we consider building in the Green Belt or countryside.

Paragraph 80 of the NPPF clearly states that Green Belt serves a key purpose, “to assist in urban regeneration, by encouraging the recycling of derelict land and other urban land”. In order to comply with central planning policy we need a brownfield strategy that states clearly, “We are committed to a brownfield first initiative whereby all applications on previously developed land are given fast track priority and every facility to promote development for residential purposes and employment purposes in order to satisfy the needs of local people. In parallel a zero CIL incentive should be given for all residential development on brownfield land.

In response to the detailed objections received in the Regulation 18 process of the 2014 Local Plan and also in accordance with government policy a Guildford brownfield land register should be urgently compiled showing address, ownership, occupier, current use and detailed planning brief.

A head of brownfield should be appointed at GBC with a clear briefing to deliver brownfield targets of housing and employment space.

GBC needs to accelerate the residential redevelopment at Woodbridge Meadows, Walnut Tree Close and the Station within the next 5 years.

GBC needs to examine the residential development opportunity of the 25.7 acres of car parks in GBC ownership.

I do not consider that the target of 1,172 homes in the town centre takes account of the need and demand for housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town which will in itself help to sustain the retail core by increased economic impact.

The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015 which has recently been adopted by GBC. The reality is that the Town Centre has the capacity for at least 5,000 homes.
The additional target capacity of 5,000 could easily be provided within the following urban sites which have the capacity for 7,500 homes:

- 2,500 homes detailed in Masterplan 2015 including Woodbridge Meadows which can itself be increased substantially
- 500 homes at North Street
- 1000 homes on current GBC car parks (25 acres) and at the station
- 1000 homes saved in the urban area if 100% of students are accommodated on Surrey University campus (17 ha of car parks)
- 1000 homes at Slyfield on the 40 ha regeneration site
- 1000 windfall infill (50 per annum)
- 500 homes on brownfield sites in villages on sites of max 1ha which do not impact Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/16036  **Respondent:** 1085953 / MARK Curtis  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**POLICY D4 DEVELOPMENT IN URBAN AREAS**

I object to policy D4 Development in urban areas and inset villages

This policy that does not address the opportunity for building in the urban area

The plan envisages that 40% of homes built will be “affordable”, but this does not provide any accommodation for low-paid workers, for example, those on the minimum wage, who cannot afford to buy so-called “affordable” homes or pay an “affordable” rent. There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low-paid workers such as those employed in the retail, warehousing and distribution sectors (all of which this plan aspires to expand).

The number of homes planned in the urban area is much too low. There is a glaring need for regeneration in many urban areas, particularly Guildford Town Centre but this is ignored in favour of building homes on green-field sites instead.

This will not address urban housing needs. It is also unsustainable, since building outside the town does disproportionate harm to road traffic, air quality and overstretched infrastructure.

The plan envisages a large expansion of the retail sector, but this is hard to justify because the sector is in rapid and continuous decline.

**THE BROWNFIELD OPPORTUNITY**

Yes, we need a new Local Plan for our borough in order to provide a development strategy within which we can accommodate our local housing, economic and environmental needs. But first we must make good use of our urban brownfield before we consider building in the Green Belt or countryside.

Paragraph 80 of the NPPF clearly states that Green Belt serves a key purpose, “to assist in urban regeneration, by encouraging the recycling of derelict land and other urban land”. In order to comply with central planning policy we need a brownfield strategy that states clearly. “We are committed to a brownfield first initiative whereby all applications on previously developed land are given fast track priority and every facility to promote development for residential
purposes and employment purposes in order to satisfy the needs of local people. In parallel a low CIL incentive should be given for all residential development on brownfield land.

In response to the detailed objections received in the Regulation 18 process of the 2014 Local Plan and also in accordance with government policy a Guildford brownfield land register should be urgently compiled showing address, ownership, occupier, current use and detailed planning brief

Perhaps someone could be appointed at GBC with a clear briefing to deliver brownfield targets of housing and employment space

GBC needs to accelerate the residential redevelopment at Woodbridge Meadows, Walnut Tree Close and the Station within the next 5 years

GBC needs to examine the residential development opportunity of the 25.7 acres of car parks in GBC ownership

I do not consider that the target of 1,172 homes in the town centre takes account of the need and demand for housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town which will in itself help to sustain the retail core by increased economic impact.

The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015 which has recently been adopted by GBC. The reality is that the Town Centre has the capacity for significantly more homes. See details on GGG website - Guildford Greenbelt Group

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11157  Respondent: 10860801 / Andrew Gavan  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

It is not clear what design of infill housing is proposed. East Horsley has uniquely varied quality housing, and standard block builds would detract from this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13665  Respondent: 10874273 / Margaret Pearce  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to policy D4( development in urban areas and inset villages ) I object because there is no commitment to expand social housing or accommodation for people who cannot afford the so called affordable homes. The objectives for inset villages are cancelled out by plans for excessive growth .

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
### Comment ID: PSLPP16/18211  **Respondent:** 10883201 / Danny McHugh  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

### Comment ID: PSLPP16/13521  **Respondent:** 10890177 / Cheryl Burnside  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

**POLICY D4**

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

### Comment ID: PSLPP16/18150  **Respondent:** 10910273 / Lynda M Williams  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.
We support this design policy, although not the proposal of Policy P2 to inset East Horsley 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: PSLPP16/12737</th>
<th>Respondent: 10910625 / Alyson Blackwell</th>
<th>Agent:</th>
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</table>

Policy D4: I object to the insetting of villages (meaning in fact, removal of villages from Green Belt protections) and the fact that they will suffer from higher density development and the resulting increase in traffic, increased use of infrastructure which is already under pressure. I object in particular to the insetting of West Clandon, Send and the Horsleys. This will have a detrimental impact on Green Belt openness and the views in and out of the AONB in direct contravention of Policy P1 and P2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/2481</th>
<th>Respondent: 10912705 / Tim Williams</th>
<th>Agent:</th>
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</table>

I object to the Policy P2 in respect of insetting 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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<tr>
<th>Comment ID: PSLPP16/14777</th>
<th>Respondent: 10920129 / Steven Marshall</th>
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Development in urban areas and inset villages OBJECT. As mentioned before, I object to the insetting of East Horsley from the Green Belt. Development in inset villages is unsustainable as it does disproportionate harm to the environment, increases road traffic, worsens air quality and puts unreasonable demands on already overstretched services, such as schools and medical centres. The infrastructure of East Horsley is just not able to support the additional housing being proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/11335  Respondent: 10923297 / Matthew Burnham  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY D4 (DEVELOPMENT IN URBAN AREAS AND INSET VILLAGES)

• No commitment to expand social housing or accommodation for people who can’t afford so-called affordable homes.
• Not enough new homes in urban areas, despite demand and need for urban regeneration and protection of Green Belt.
• Objectives for inset villages cancelled out by plans for excessive housing growth there.
• Too much emphasis on traditional shops, when a lot of this sector is in terminal decline.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9038  Respondent: 10928737 / Guy Pashley  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1722  Respondent: 10933793 / Julia Tilbury  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY D4- Development in urban areas and inset villages

I OBJECT. This is a piously aspirational policy that does not address any of the obvious practical issues already touched on above:

• The plan envisages that 40% of homes built will be “affordable”, but this does not provide any accommodation for low-paid workers, for example, those on the minimum wage, who cannot afford to buy so-called “affordable”
homes or pay an "affordable" There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low-paid workers such as those employed in the retail, warehousing and distribution sectors (all of which this plan aspires to expand). The number of homes planned in the urban area is too low. There is a glaring need for regeneration in many urban areas, but this is ignored in favour building homes on green-field sites instead. This will not address urban housing needs. It is also unsustainable, since building outside the town does disproportionate harm to road traffic, air quality and overstretched infrastructure. The plan envisages a large expansion of the traditional "bricks and mortar" retail sector, but this is a sector in rapid and continuous decline. All the stated policy aims for "inset" villages will be negated by the excessive weight of new housing development proposed which would radically change their character forever. Against this disruptive background, it is barely relevant to talk about preserving views!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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- The plan envisages that 40% of homes built will be "affordable", but this does not provide any accommodation for low-paid workers, for example, those on the minimum wage, who cannot afford to buy so-called "affordable" homes or pay an "affordable" There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low-paid workers such as those employed in the retail, warehousing and distribution sectors (all of which this plan aspires to expand). The number of homes planned in the urban area is too low. There is a glaring need for regeneration in many urban areas, but this is ignored in favour building homes on green-field sites instead. This will not address urban housing needs. It is also unsustainable, since building outside the town does disproportionate harm to road traffic, air quality and overstretched infrastructure. The plan envisages a large expansion of the traditional "bricks and mortar" retail sector, but this is a sector in rapid and continuous decline. All the stated policy aims for "inset" villages will be negated by the excessive weight of new housing development proposed which would radically change their character forever. Against this disruptive background, it is barely relevant to talk about preserving views!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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The number of homes planned in the urban area is too low. There is a glaring need for regeneration in many urban areas, but this is ignored in favour building homes on green-field sites instead. This will not meet urban housing needs. It is also unsustainable, since building outside the town does disproportionate harm to road traffic, air quality and overstretched infrastructure.

The plan envisages a large expansion of the traditional “bricks and mortar” retail sector, but this is a sector in rapid and continuous decline.

All the stated policy aims for “inset” villages will be negated by the sheer weight of new housing development proposed which would radically change their character forever. Against this disruptive background, it is barely relevant to talk about preserving views!

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/18090</th>
<th>Respondent: 10939073 / Katie Waldner</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy D4</td>
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<th>Comment ID: PSLPP16/9348</th>
<th>Respondent: 10943457 / Henry Benzikie</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: PSLPP16/9349</th>
<th>Respondent: 10944161 / Stephen Benzikie</th>
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**I OBJECT** to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<th>Comment ID: PSLPP16/3063</th>
<th>Respondent: 10952705 / Moira Maidment</th>
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**I OBJECT** to Policy 04 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<tr>
<th>Comment ID: PSLPP16/15828</th>
<th>Respondent: 10953249 / Charlotte Ladd</th>
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The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Attached documents:

Comment ID: PSLPP16/15176   Respondent: 10957281 / Linda Heffer   Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy D4. – needs strengthening
This policy needs to give greater protection to the Green Belt. Currently it is too weak and will only encourage attempts to further develop the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9035   Respondent: 10959009 / Rebecca Claridge   Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12292   Respondent: 10962689 / Martin Ladd   Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

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The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.
The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14415  Respondent: 10962785 / Derek Gilmore  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

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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: PSLPP16/2347  Respondent: 10969249 / Kim Taylor-Peat  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12997  Respondent: 10972065 / Sarah Cocke  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY D4
I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9216  Respondent: 10985057 / Anthony Parker  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY D4 Development in urban areas and inset villages – I OBJECT. There are effectively two separate parts to this policy, both are flawed, and in the case on insetting, fatally flawed. In the case of urban development there are numerous flaws, including:

- The plan envisages that 40% of homes built will be affordable, but this does not provide any accommodation for low paid workers, for example, those on the minimum wage, who cannot afford to buy “affordable” homes, nor can they pay the so-called “affordable” rent. There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low paid workers such as those employed in the retail, warehousing and distribution sectors.
- The number of homes planned in the urban area is too low – there is a need for regeneration in some areas, but this is ignored and instead the plan concentrates on building homes on green field sites, which does not meet the needs for housing within the town, especially with the centre. This is not a sustainable policy as building outside the town has a disproportionate effect on road traffic.
- The plan envisages a large expansion of the traditional “bricks and mortar” retail sector, but this is a sector in long term decline.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9036  Respondent: 10987905 / Marika Chandler  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

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: pslp171/2011  Respondent: 10989761 / James Walsh  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy D4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy D4, p119: I strongly support the Council’s commitment to high standards of design and character for new developments. I feel that the design of buildings and materials used can have an important impact of the character of Guildford and would like this to be an important factor in planning decisions in future.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8338  Respondent: 10990145 / Anne Lee  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY D4

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17188  Respondent: 10990785 / Valerie Golding  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
**Policy D4**

**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. 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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<th>Comment ID: PSLPP16/7439</th>
<th>Respondent: 10992833 / Amanda Verny White</th>
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**I OBJECT to Policy D4 - Development in urban areas and inset villages**

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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:** PSLPP16/11197  **Respondent:** 10998081 / David Marshall  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

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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**Comment ID:** PSLPP16/15344  **Respondent:** 11007393 / James Culmer  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

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:** PSLPP16/7594  **Respondent:** 11010401 / J M Bates  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D4
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: PSLPP16/2463  Respondent: 11014881 / Linda Peters-Smith  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy D4 -Development in Urban Areas and Inset Villages

I object.

Low paid workers won't be able to afford the 'affordable' rent on 'affordable' homes. These should be built in the urban areas. The villages will suffer with the congestion and infrastructure strains and their character changed adversely for ever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17821  Respondent: 11033921 / Tim Depledge  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object based on how this is being applied - The "presumptive permission" implied by this policy is based on specific expectations which are all violated by building 35% extra homes in West Horsley, at density in excess of the current settlement

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/2175  Respondent: 11036129 / George Dokimakis  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object based on how this is being applied - The "presumptive permission" implied by this policy is based on specific expectations which are all violated by building 35% extra homes in West Horsley, at density in excess of the current settlement

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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- Policy D4 About Character and Design of new developments, Building for life should be made mandatory

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14151  Respondent: 11036289 / Osman Abdullah  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to policy D4 Development in urban areas and inset villages This policy that does not address the opportunity for building in the urban areaThe plan envisages that 40% of homes built will be “affordable”, but this does not provide any accommodation for low-paid workers, for example, those on the minimum wage, who cannot afford to buy so-called “affordable” homes or pay an “affordable” rent. There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low-paid workers such as those employed in the retail, warehousing and distribution sectors (all of which this plan aspires to expand). The number of homes planned in the urban area is much too low. There is a glaring need for regeneration in many urban areas, particularly Guildford Town Centre but this is ignored in favour of building homes on green-field sites instead. This will not address urban housing needs. It is also unsustainable, since building outside the town does disproportionate harm to road traffic, air quality and overstretched infrastructure. The plan envisages a large expansion of the retail sector, but this is hard to justify because the sector is in rapid and continuous decline. THE BROWNFIELD OPPORTUNITY Yes, we need a new Local Plan for our borough in order to provide a development strategy within which we can accommodate our local housing, economic and environmental needs. But first we must make good use of our urban brownfield before we consider building in the Green Belt or countryside. Paragraph 80 of the NPF clearly states that Green Belt serves a key purpose, “to assist in urban regeneration, by encouraging the recycling of derelict land and other urban land”. In order to comply with central planning policy we need a brownfield strategy that states clearly. “We are committed to a brownfield first initiative whereby all applications on previously developed land are given fast track priority and every facility to promote development for residential purposes and employment purposes in order to satisfy the needs of local people. In parallel a low CIL incentive should be given for all residential development on brownfield land.In response to the detailed objections received in the Regulation 18 process of the 2014 Local Plan and also in accordance with government policy a Guildford brownfield land register should be urgently compiled showing address, ownership, occupier, current use and detailed planning briefPerhaps someone could be appointed at GBC with a clear briefing to deliver brownfield targets of housing and employment spaceGBC needs to accelerate the residential redevelopment at Woodbridge Meadows, Walnut Tree Close and the Station within the next 5 yearsGBC needs to examine the residential development opportunity of the 25.7 acres of car parks in GBC ownership.GBC needs to examine the potential for residential development on brownfield land and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015 which has recently been adopted by GBC. The reality is that the Town Centre has the capacity for significantly more homes. See details on GGG website - Guildford Greenbelt Group

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14589  Respondent: 11036801 / Judith Mercer  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPP16/1879  **Respondent:** 11037441 / Bryan Joseph  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I OBJECT to POLICY D4(Development in urban areas and inset villages)

There is no commitment to expand social housing or homes for people who can't afford so called "affordable homes".

There is a demand for urban regeneration and protection of the Green Belt, but there is not enough new homes planned in urban areas. There is a pressing need for these but it is ignored favouring instead homes built on green field sites, which will be not be affordable for low paid workers who work in the towns. This policy has been drawn up to help developers where it allows them to build on green fields which is 'easier' and potentially more profitable for them than helping to provide more urban housing.

Any aims for inset villages would be cancelled out by the plan for excessive housing. It is also unsustainable as building outside the town causes increased harm to roads, air quality and overstretched infrastructure.

The plan for more retail buildings would be inappropriate in view of the continual decline in this sector.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/7336  **Respondent:** 11041121 / Catherine Dean  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

**Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )**

Inset villages and Urban areas have been swept up into a single planning statement. This does not reflect the nature of the so called inset villages as rural environments and completely negates the Green Belt nature that existed in these villages beforehand. I cannot therefore see that these areas are being declared as urban areas and that development of that nature will follow.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/1879  **Respondent:** 11037441 / Bryan Joseph  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object to this policy on the following grounds:

1. The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt, and the per person infrastructure investment can be reduced, e.g. fewer pavements, sewers, utility ducting per household than in the open countryside. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development. Living in a town with good access to public transport reduces the desire for personal transportation.
2. The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately and is not sustainable.

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>
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<td>I welcome the considerable strengthening of this Policy. It will serve the Borough well.</td>
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POLICY D4 (DEVELOPMENT IN URBAN AREAS AND INSET VILLAGES) – I object. Despite the need to meet urban demand, regenerate our run-down town and protect the countryside, there isn’t a high enough proportion of new homes planned for urban areas. There’s no encouragement given to expand social housing or genuinely affordable homes. The aims set out for inset villages would be nullified by the excessive level of new housing to be built there. Once again there is too much encouragement for traditional types of shopping that are now out of date.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. **POLICY D4**

I OBJECT to Policy D4 - Development in urban areas and inset villages

The Policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The Policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this Policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
I object to policy D4 Development in urban areas and inset villages. This policy that does not address the opportunity for building in the urban area. The plan envisages that 40% of homes built will be “affordable”, but this does not provide any accommodation for low-paid workers, for example, those on the minimum wage, who cannot afford to buy so-called “affordable” homes or pay an “affordable” rent. There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low-paid workers such as those employed in the retail, warehousing and distribution sectors (all of which this plan aspires to expand). The number of homes planned in the urban area is much too low. There is a glaring need for regeneration in many urban areas, particularly Guildford Town Centre but this is ignored in favour of building homes on green-field sites instead. This will not address urban housing needs. It is also unsustainable, since building outside the town does disproportionate harm to road traffic, air quality and overstretched infrastructure. The plan envisages a large expansion of the retail sector, but this is hard to justify because the sector is in rapid and continuous decline.

THE BROWNFIELD OPPORTUNITY

Yes, we need a new Local Plan for our borough in order to provide a development strategy within which we can accommodate our local housing, economic and environmental needs. But first we must make good use of our urban brownfield before we consider building in the Green Belt or countryside. Paragraph 80 of the NPPF clearly states that Green Belt serves a key purpose, “to assist in urban regeneration, by encouraging the recycling of derelict land and other urban land”. In order to comply with central planning policy we need a brownfield strategy that states clearly, “We are committed to a brownfield first initiative whereby all applications on previously developed land are given fast track priority and every facility to promote development for residential purposes and employment purposes in order to satisfy the needs of local people. In parallel a low CIL incentive should be given for all residential development on brownfield land. In response to the detailed objections received in the Regulation 18 process of the 2014 Local Plan and also in accordance with government policy a Guildford brownfield land register should be urgently compiled showing address, ownership, occupier, current use and detailed planning brief. Perhaps someone could be appointed at GBC with a clear briefing to deliver brownfield targets of housing and employment space. GBC needs to accelerate the residential redevelopment at Woodbridge Meadows, Walnut Tree Close and the Station within the next 5 years. GBC needs to examine the residential development opportunity of the 25.7 acres of car parks in GBC ownership. We do not consider that the target of 1,172 homes in the town centre takes account of the need and demand for housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town which will in itself help to sustain the retail core by increased economic impact. The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015 which has recently been adopted by GBC. The reality is that the Town Centre has the capacity for significantly more homes. See details on GGG website - Guildford Greenbelt Group.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17/413  Respondent: 11149217 / Royal Horticultural Society (RHS)  Agent: Montagu Evans LLP (Montagu Evans)

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The criteria required for granting planning permission for new development in urban areas and inset villages is supported by the RHS.

At this stage, we would like to reiterate the request for Wisley Gardens and Wisley Village to be included as an inset within the Green Belt.

Aside from the land owned by the RHS at Wisley Village (which is the majority lying east of the River Wey) there are significant other employers and business in the village including the National Trust Regional Offices.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: pslp171/1923  Respondent: 11149217 / Royal Horticultural Society (RHS)  Agent: Montagu Evans LLP (Montagu Evans)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The emphasis on high quality design and criteria for new development to achieve in terms of character and design is supported by the RHS.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15852  Respondent: 11150913 / Sarah Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7301  Respondent: 11547041 / Jen Wright  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I also object to infilling and adding houses to the Jacobs Well village when there is no other infrastructure to support this. It is already the case that living on Blanchards Hill we cannot be certain of which primary or secondary school our child would be able to attend and this uncertainty would only increase if further houses were to be built. In general if more houses are to be built across the borough then schools designed for the villages (inset or not) need to be built or existing nearby schools expanded. For example, our nearest primary school is Burpham at 0.9 miles but we are highly unlikely to receive a place and children from Jacobs Well village are forced to go to schools all over Guildford which is unacceptable and difficult for working parents. For secondary school the rules are even more ludicrous as the existence of a relatively small Church of England school, Christs College, as our nearest school, which takes 50% of christian faith and then
children from several feeder schools first means that our child cannot reasonably be likely to be offered a place at this
school in most if not all years. However the "nearest school" criteria used by most other schools (for example our second
nearest, George Abbott) then means that we would not get into another nearby school either. Therefore until the schools
situation for villages like Jacobs Well is fixed or the local schools are forced to change their admittance criteria so as to
cater for people in such villages without them being left to have a place in whichever dire school still has places left each
year, then I do not think that further houses should be built in such 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? ( )

30 POLICY D4 DEVELOPMENT IN URBAN AREAS

30.1 I object to policy D4 Development in urban areas and inset villages

30.2 This policy that does not address the opportunity for building in the urban area

30.3 The plan envisages that 40% of homes built will be “affordable”, but this does not provide any accommodation for low-paid workers, for example, those on the minimum wage, who cannot afford to buy so-called “affordable” homes or pay an “affordable” rent. There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low-paid workers such as those employed in the retail, warehousing and distribution sectors (all of which this plan aspires to expand).

30.4 The number of homes planned in the urban area is much too low. There is a glaring need for regeneration in many urban areas, particularly Guildford Town Centre but this is ignored in favour of building homes on green-field sites instead.

30.5 This will not address urban housing needs. It is also unsustainable, since building outside the town does disproportionate harm to road traffic, air quality and overstretched infrastructure.

30.6 The plan envisages a large expansion of the retail sector, but this is a sad voice from the past because the sector is in rapid and continuous decline.

30.7 All the stated policy aims for “inset” villages will be negated by the excessive weight of new housing development proposed which would radically change their character forever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4783  Respondent: 15084897 / Save Send Action Group (Andrew Procter)  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

31 THE BROWNFIELD OPPORTUNITY

31.1 Yes, we need a new Local Plan for our borough in order to provide a development strategy within which we can accommodate our local housing, economic and environmental needs. But first we must make 100% use of our urban brownfield before we consider building in the Green Belt or countryside.

31.2 Paragraph 80 of the NPPF clearly states that Green Belt serves a key purpose, “to assist in urban regeneration, by encouraging the recycling of derelict land and other urban land”. In order to comply with central planning policy we need a brownfield strategy that states clearly. “We are committed to a brownfield first initiative whereby all applications on previously developed land are given fast track priority and every facility to promote development for residential purposes and employment purposes in order to satisfy the needs of local people. In parallel a zero CIL incentive should be given for all residential development on brownfield land.

31.3 In response to the detailed objections received in the Regulation 18 process of the 2014 Local Plan and also in accordance with government policy a Guildford brownfield land register should be urgently compiled showing address, ownership, occupier, current use and detailed planning brief
31.4 A head of brownfield should be appointed at GBC with a clear briefing to deliver brownfield targets of housing and employment space.

31.5 GBC needs to accelerate the residential redevelopment at Woodbridge Meadows, Walnut Tree Close and the Station within the next 5 years.

31.6 GBC needs to examine the residential development opportunity of the 25.7 acres of car parks in GBC ownership.

31.7 I do not consider that the target of 1,172 homes in the town centre takes account of the need and demand for housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town which will in itself help to sustain the retail core by increased economic impact.

31.8 The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015 which has recently been adopted by GBC. The reality is that the Town Centre has the capacity for at least 5,000 homes.

31.9 The additional target capacity of 5,000 could easily be provided within the following urban sites which have the capacity for 7,500 homes:

- 2,500 homes detailed in Masterplan 2015 including Woodbridge Meadows which can itself be increased substantially
- 500 homes at North Street
- 1000 homes on current GBC car parks (25 acres) and at the station
- 1000 homes saved in the urban area if 100% of students are accommodated on Surrey University campus (17 ha of car parks)
- 1000 homes at Slyfield on the 40 ha regeneration site
- 1000 windfall infill (50 per annum)
- 500 homes on brownfield sites in villages on sites of max 1 ha which do not impact 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: PSLPP16/8946</th>
<th>Respondent: 15107297 / Ian McQuattie</th>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/428  Respondent: 15138849 / Anne Walters  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the 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?

Comment ID: PSLPP16/472  Respondent: 15141281 / Robert Thompson  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4
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?

Comment ID: PSLPP16/490  Respondent: 15141953 / R Pomphrey  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4
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 villages from the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Comment ID: PSLPP16/689  Respondent: 15154241 / Brendan Laing  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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.
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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13754  Respondent: 15227905 / Nigel Alexander  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY D4 (DEVELOPMENT IN URBAN AREAS AND INSET VILLAGES)

• No commitment to expand social housing or accommodation for people who can’t afford so-called affordable homes.
• Not enough new homes in urban areas, despite demand and need for urban regeneration and protection of Green Belt.
• Objectives for inset villages cancelled out by plans for excessive housing growth there.
• Too much emphasis on traditional shops, when a lot of this sector is in terminal decline.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1750  Respondent: 15244641 / Wesley Raynbird-Tilbury  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY D4- Development in urban areas and inset villages

I OBJECT. This is a piously aspirational policy that does not address any of the obvious practical issues already touched on above:

• The plan envisages that 40% of homes built will be "affordable", but this does not provide any accommodation for low-paid workers, for example, those on the minimum wage, who cannot afford to buy so-called "affordable" homes or pay an "affordable" There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low-paid workers such as those employed in the retail, warehousing and distribution sectors (all of which this plan aspires to expand).
• The number of homes planned in the urban area is too low. There is a glaring need for regeneration in many urban areas, but this is ignored in favour building homes on green-field sites instead. This will not address urban housing needs. It is also unsustainable, since building outside the town does disproportionate harm to road traffic, air quality and overstretched infrastructure.
• The plan envisages a large expansion of the traditional "bricks and mortar" retail sector, but this is a sector in rapid and continuous decline.
• All the stated policy aims for "inset" villages will be negated by the excessive weight of new housing development proposed which would radically change their character forever. Against this disruptive background, it is barely relevant to talk about preserving views!
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1814  Respondent: 15247265 / Aileen Aitcheson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY D4: Development in urban areas and inset villages

We support this design policy, although not the proposal of Policy P2 to inset 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: PSLPP16/1838  Respondent: 15247745 / Brian Aitcheson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY D4: Development in urban areas and inset villages

We support this design policy, although not the proposal of Policy P2 to inset 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: PSLPP16/17657  Respondent: 15256225 / Boyer (Michelle Thomson)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Settlement boundary of villages

1.21 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.

1.22 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.
1.23 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.

1.24 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.

1.25 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.

1.26 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:** PSLPP16/2254  **Respondent:** 15263425 / Rosemary Napp  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

It is essential that layout, scale, form, height and materials, as described is a primary consideration in all applications. In Guildford town no buildings should be developed that exceed 4 stories, except in circumstances where it can be clearly demonstrated that the critical views and surrounding environment will not be compromised, and then 5 stories should be the absolute limit.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/2282  **Respondent:** 15275009 / Compton Parish Council (Fiona Curtis)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )**

We object to policy D4 Development in urban areas and inset villages. The NPPF does not include a definition of 'insetting' in its glossary and the definition used by GBC (Where a village is excluded from the Green Belt boundary. Currently the villages of Guildford are washed over by the Green Belt and form part of it) does not explain the rationale behind the choice of villages removed or 'inset? It is unclear what exceptional circumstances could warrant the removal of Greenbelt from 15 villages in one sweep? These have not been outlined. The policy lacks clarity and transparency.

This policy that does not address the opportunity for building in the urban area. The plan envisages that 40% of homes built will be “affordable”, but this does not provide any accommodation for low-paid workers, for example, those on the minimum wage, who cannot afford to buy so-called “affordable” homes or pay an “affordable” rent. There is a need for
some expansion in social housing, especially in urban areas, where there is a greater concentration of low-paid workers such as those employed in the retail, warehousing and distribution sectors (all of which this plan aspires to expand). The number of homes planned in the urban area is much too low. There is a need for regeneration in many urban areas, particularly Guildford Town Centre but this is ignored in favour of building homes on green-field sites instead. This will not address urban housing needs. It is also unsustainable, since building outside the town does disproportionate harm to road traffic, air quality and overstretched infrastructure. The plan envisages a large expansion of the retail sector, but this is hard to justify.

The landscape character assessment suggested that Blackwell Farm be included in the AONB review, yet GBC excluded it.

A residential Guide from 2004 would be out of date wouldn't it? Technology has come on leaps and bounds since this time.

Blackwell Farm is listed as SW Urban, when it is open and beautiful countryside? This is mis-leading.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10963  **Respondent:** 15282625 / Kelly Graves  **Agent:**

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY D4 (DEVELOPMENT IN URBAN AREAS AND INSET VILLAGES)
• No commitment to expand social housing or accommodation for people who can’t afford so-called affordable homes.
• Not enough new homes in urban areas, despite demand and need for urban regeneration and protection of Green Belt.
• Objectives for inset villages cancelled out by plans for excessive housing growth there.
• Too much emphasis on traditional shops, when a lot of this sector is in terminal decline.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2532  **Respondent:** 15283105 / Chris Woods  **Agent:**

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Policy D4 implies that the occupants of buildings should continue to be able to enjoy the amenities. This would be best stated explicitly. It is fundamental to there being “no unacceptable effect on the amenities in terms of privacy, noise, vibration, pollution, dust, smell and access to sunlight and daylight.”

For the proposal for East Horsley I object in that there would be a reduction in the enjoyment of amenities by the occupants of buildings due to:

1) Local medical facilities being stretched already
2) Roads are narrow and clogged during peak periods
3) There is no plan to change those roads to ease congestion

4) Insufficient car parking in the community and shopping areas for the intended additional residents. This would be exacerbated if the Wisley Airfield draft plan is actioned.

5) Various roads in East Horsley have no, or narrow footpaths. Increasing the local population will increase the chances of accidents

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2798  Respondent: 15298849 / Elaine Burns  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY D4: Development in urban areas and inset villages

I support this design policy, although not the proposal of Policy P2 to inset East and 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: PSLPP16/14229  Respondent: 15299201 / Samira Abdullah  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to policy D4 Development in urban areas and inset villages. This policy that does not address the opportunity for building in the urban area. The plan envisages that 40% of homes built will be “affordable”, but this does not provide any accommodation for low-paid workers, for example, those on the minimum wage, who cannot afford to buy so-called “affordable” homes or pay an “affordable” rent. There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low-paid workers such as those employed in the retail, warehousing and distribution sectors (all of which this plan aspires to expand). The number of homes planned in the urban area is much too low. There is a glaring need for regeneration in many urban areas, particularly Guildford Town Centre but this is ignored in favour of building homes on green-field sites instead. This will not address urban housing needs. It is also unsustainable, since building outside the town does disproportionate harm to road traffic, air quality and overstretched infrastructure. The plan envisages a large expansion of the retail sector, but this is hard to justify because the sector is in rapid and continuous decline.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
THE BROWNFIELD OPPORTUNITY

Yes, we need a new Local Plan for our borough in order to provide a development strategy within which we can accommodate our local housing, economic and environmental needs. But first we must make good use of our urban brownfield before we consider building in the Green Belt or countryside. Paragraph 80 of the NPPF clearly states that Green Belt serves a key purpose, “to assist in urban regeneration, by encouraging the recycling of derelict land and other urban land”. In order to comply with central planning policy we need a brownfield strategy that states clearly. “We are committed to a brownfield first initiative whereby all applications on previously developed land are given fast track priority and every facility to promote development for residential purposes and employment purposes in order to satisfy the needs of local people. In parallel a low CIL incentive should be given for all residential development on brownfield land. In response to the detailed objections received in the Regulation 18 process of the 2014 Local Plan and also in accordance with government policy a Guildford brownfield land register should be urgently compiled showing address, ownership, occupier, current use and detailed planning brief. Perhaps someone could be appointed at GBC with a clear briefing to deliver brownfield targets of housing and employment space. GBC needs to accelerate the residential redevelopment at Woodbridge Meadows, Walnut Tree Close and the Station within the next 5 years. GBC needs to examine the residential development opportunity of the 25.7 acres of car parks in GBC ownership. I do not consider that the target of 1,172 homes in the town centre takes account of the need and demand for housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town which will in itself help to sustain the retail core by increased economic impact. The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015 which has recently been adopted by GBC. The reality is that the Town Centre has the capacity for significantly more homes. See details on GGG website - Guildford Greenbelt Group.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2832  Respondent: 15299425 / Tim and June Yorath  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY D4 - Development in urban areas and inset villages

We object to this policy:

1. The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

2. The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionally.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2870  Respondent: 15301089 / Brian Yeomans  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4
I OBJECT to Development in urban areas and inset villages.

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
• No commitment to expand social housing or accommodation for people who can’t afford so-called affordable homes.
• Not enough new homes in urban areas, despite demand and need for urban regeneration and protection of Green Belt.
• Objectives for inset villages cancelled out by plans for excessive housing growth there.
• Too much emphasis on traditional shops, when a lot of this sector is in terminal decline.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3156  Respondent: 15323041 / Jane Doherty  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I support this design policy, although not the proposal of Policy P2 to inset 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: PSLPP16/3320  Respondent: 15327905 / Julia Cook  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY D4 - Development in urban areas and inset villages

I OBJECT. This does not address any of the obvious practical issues already touched on above:

• The plan envisages that 40% of homes built will be “affordable”, but this does not provide any accommodation for low-paid workers, for example, those on the minimum wage, who cannot afford to buy so-called “affordable” homes or pay an “affordable” rent. There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low-paid workers such as those employed in the retail, warehousing and distribution sectors (all of which this plan aspires to expand).
• The number of homes planned in the urban area is too low. There is a glaring need for regeneration in many urban areas, but this is ignored in favour building homes on green-field sites instead. This will not address urban housing needs. It is also unsustainable, since building outside the town does disproportionate harm to road traffic, air quality and overstretched infrastructure.
• The plan envisages a large expansion of the traditional “bricks and mortar” retail sector, but this is a sector in rapid and continuous decline.
• All the stated policy aims for “inset” villages will be negated by the excessive weight of new housing development proposed which would radically change their character forever. Against this disruptive background, it is barely relevant to talk about preserving views!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
8. Policy D4: we object to the insetting of villages (meaning in fact, removal of villages from Green Belt protections) and the fact that they will be suffer from higher density development and the resulting increase in traffic, use of infrastructure which is already under pressure. We object in particular to the insetting of West Clandon, Send and the Horsleys. This will have a detrimental impact on Green Belt openness and the views in and out of the AONB in direct contravention of Policy P1 and P2.

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 D4

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

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<th>15371361 / Friends of Normandy Wildlife (Alistair Lawson)</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**3.1.3 Impact of the proposed density of housing and Policy D4.**

A large development such as proposed for site A46, with urban housing density, will impact significantly on wildlife within the ancient woodland and veteran trees on the site. The damage to both the environment and its wildlife would be immeasurable regardless of whether buffer zones are put in place.

Not only would the woodland wildlife on the site be harmed, but also wildlife in the woodland next to the site, i.e. the North end of Walden's Copse and Pussey's Copse. Furthermore, it is very important not to break the canopy in any of the existing connections between these woodlands for fear of wildlife isolation. Dormice, for example, do not often like to come down to the ground preferring to move through the canopy.

With the proposed development will come cars, noise, light and air pollution all of which are hazardous to wildlife. As well as increased human activity, there are likely to be approximately 187 extra cats in the area, cat ownership currently being 17 out of 100 households, together with a large number of dogs (see section 3.1.1. above). These animals would undoubtedly have a serious impact on the wildlife of the woodland areas no matter how well the woodland are protected by fencing for example (it is well known that people cut fencing to facilitate access).

The elimination of farmland on site A46, which has traditionally been used for grazing, would also be disastrous since it provides habitat for a variety of wildlife including hedgehogs (which are seriously in decline), bats, owls, and woodpeckers. The open fields are important hunting grounds for barn owls, which can only hunt over open space, and birds of prey such as red kite, buzzard and kestrel. Bats have been seen to hunt by the avenue of ancient oaks and on the wooded edges.

At present, the majority of houses in the villages of Normandy and Flexford have fairly large gardens, which support large numbers of wildlife species. The increased density in housing will come with gardens of much reduced size. There is also a trend in such housing developments for areas to be paved over for parking. Taken together, this results in a further reduction in the amount of green space, and the value of the gardens for wildlife declines.

GBC are of the opinion that the size of garden is irrelevant when it comes to maintaining biodiversity (see answer given by GBC to question 26 at the meeting organised by Normandy Parish Council on 24 February 2016). This is incorrect. According to an internet article compiled by Ken Thompson and Steve Head, entitled 'Gardens as a resource for wildlife' (Wildlife Gardening Forum) It has been shown that total vegetation is a major determinant of diversity and abundance of...
wildlife. In this article the potential national significance of gardens as a resource for wildlife is clear, but that as garden size decreases, the area occupied by trees, hedges and tall shrubs also declines, with a resulting decline in biodiversity.

Policy D4 anticipates that new possible development sites will be proposed in inset villages (which will include Normandy and Flexford if the Plan is adopted) in addition to current site locations. Whilst they state that they aim to protect the important character of these inset villages using other development management policies, it is inevitable that any such development, if granted, will further increase housing density, with greater impacts on wildlife (as above).

GBC state in the Plan that they have a responsibility to use natural resources, such as land, wisely. They are of the view that increasing densities of housing is one such wise use of land, because it makes development more sustainable. However they fail to take account of the impact of such development on wildlife and the environment, both within the proposed development site and on statutory and non-statutory designated sites in and around Normandy and Flexford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/4834 | 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 D4 Development in urban areas and inset villages

GROUND FOR OBJECTION There are effectively two separate parts to this policy, both are flawed, and in the case on insetting, fatally flawed. In the case of urban development there are numerous flaws, including:

- The plan envisages that 40% of homes built will be affordable, but this does not provide any accommodation for low paid workers, for example, those on the minimum wage, who cannot afford to buy “affordable” homes, nor can they pay the so-called “affordable” rent. There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low paid workers such as those employed in the retail, warehousing and distribution sectors.
- The number of homes planned in the urban area is too low – there is a need for regeneration in some areas, but this is ignored and instead the plan concentrates on building homes on green field sites, which does not meet the needs for housing within the town, especially with the centre. This is not a sustainable policy as building outside the town has a disproportionate effect on road traffic.
- The plan envisages a large expansion of the traditional “bricks and mortar” retail sector, but this is a sector in long term decline.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/4860 | Respondent: 15379969 / Teresa Britton | Agent: |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
1. POLICY D4

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

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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: PSLPP16/5031  Respondent: 15383425 / Christine Fordham  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

It would make logical sense to build on existing Brownfield site first rather than destroying the valuable Greenfield sites. There are many Brownfield sites in Guildford city centre created from redundant office spaces and this area could be used to build extra houses, where services and transport links are close by and where there are many local secondary schools nearby. This would be a more sustainable solution as you can regenerate disused areas rather than depleting Greenfield sites. Furthermore, the roads in the centre are able to accommodate increased traffic rather than creating more traffic in a rural area with a single lane underpass. It is vital that the Flexford and Normandy area is kept as a rural, spacious area and that the greenbelt areas are not built on.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5140  Respondent: 15386017 / Gareth Sinnett  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

16. POLICY D4
I OBJECT to Policy D4 Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

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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: PSLPP16/5159  Respondent: 15386337 / Edna Slater  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4
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Attached documents:

Comment ID: PSLPP16/5659  Respondent: 15405857 / Raymond Mackay  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4
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: PSLPP16/5691  Respondent: 15406017 / Eleanor Roberts  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4
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: PSLPP16/5721  Respondent: 15406529 / David I Allan  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4
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The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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Attached documents:

Comment ID: PSLPP16/6157  Respondent: 15425665 / East Clandon Parish Council (Alyson Blackwell)  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY 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:

Comment ID: PSLPP16/6217  Respondent: 15426305 / I C Dean  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY D4 - Development in urban areas and inset villages

I object to this policy:

1. The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

2. The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion on road infrastructure which cannot cope. For many inset villages, the public transport is utterly inadequate and is being cut year by year. Such development is not sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6275  Respondent: 15427617 / Ken Scotland  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: PSLPP16/6717  Respondent: 15437505 / Terri Smart  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy D4

I OBJECT to the insetting of villages a.k.a. removal of villages from Green Belt protection. I OBJECT to the insetting of West Clandon, Send, East Horsley and West Horsley which will have a detrimental impact on the openness of the Green Belt and the views in and out of the AONB.

These neighbouring village developments will result in higher density development, additional road traffic and use of infrastructure in our area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6748  Respondent: 15437889 / Janet Smith  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Development in Urban areas and inset villages. 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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Respondent: 15442081 / Lauren Fassom</th>
<th>Agent:</th>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7125  Respondent: 15442721 / Elizabeth Robson  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I Object to development policy for inset villages because:

- There is already a method of achieving appropriate development in villages by the "washed over" status they have. As this works it should be retained and not removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7147  Respondent: 15442913 / Inger Scotland  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

16. POLICY D4

I OBJECT to Policy D4 - Development in urban areas and inset villages.

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7269  Respondent: 15446145 / Nigel & Jane Simpson  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Policy D4: we object to the insetting of villages (meaning in fact removal of the villages from greenbelt protection) and the fact that they will suffer from higher density development and the resulting increase in traffic, use of infrastructure etc., which is already under pressure. We object in particular to the insetting of West Clandon, Send and the Horsleys. This will have a detrimental impact on greenbelt openness and the views in and out of the area of natural beauty and indirect contravention of Policy P1 and P2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14378  Respondent: 15446401 / Louise Yandle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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• Too much emphasis on traditional shops, when a lot of this sector is in terminal decline.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7436  Respondent: 15448321 / Nicole Mapplebeck  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

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Attached documents:

Comment ID: PSLPP16/7437  Respondent: 15448353 / Emily Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

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<th>Comment ID: PSLPP16/7438</th>
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Policy D4 (Development in urban areas and inset villages) requires that: “proposals for new development within inset village areas will have particular regard to: the distinctive settlement pattern of the village and the important relationship between the built development and the surrounding landscape; important views of the village from the surrounding landscape and views within the village of local landmarks.” As previously mentioned this proposal does not fulfill this requirement particularly in the area of the distinctive settlement pattern of the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to POLICY D4 - Development in urban areas and inset villages

- No commitment to expand social housing or accommodation for people who can’t afford so-called affordable homes.
- Not enough new homes in urban areas, despite demand and need for urban regeneration and protection of Green Belt.
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Comment ID: PSLPP16/9347  Respondent: 15481409 / Amy F Corstin  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

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Comment ID: PSLPP16/9825  Respondent: 15486209 / Mark Soley  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I wanted to draw your attention to my objection to the proposed developments in West and East Horsley and the surrounding areas. It seems there have been no sound reasons given for the proposed changes which seem to be aimed solely at increasing land available within the settlements for future additional development.

I am also opposed to the village’s removal from the Green Belt by insetting and extending the 003 Local Plan Settlement Area boundaries. West Horsley Parish is one of a rich and varied mix of established lo 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 through the seasons each year. This added to your proposed circa 3,000 additional houses will ensure the Village infrastructure falls apart.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10049  Respondent: 15495873 / Gerard Duvé  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Development in Urban Areas and Inset Villages

I do not object if policies H2 and H3 are implemented and **all** H2 developments are implemented without developers using clause 4.2.40 to escape their responsibilities.

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: PSLPP16/10260</th>
<th>Respondent: 15499297 / Alex Mundy</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: PSLPP16/10673</th>
<th>Respondent: 15502209 / Shirley Atkinson</th>
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Attached documents:

Comment ID: PSLPP16/10570  Respondent: 15504001 / Margaret Banks  Agent:

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Attached documents:

Comment ID: PSLPP16/11088  Respondent: 15509057 / Richard Golding  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT. This policy that does not address any of the obvious practical issues already touched on but it is essential, that a reasonable amount of affordable housing is available for purchase but it also essential that there should property that are affordable for rent. Yet recently when any development has taken place in Send affordable is the last thing on the developers mind. Tice the builder, house and yard was recently redeveloped with four-bed room houses. A police house was redeveloped, Skene Close was the result with six houses selling for between £630 to 690,000, and a plot in Send Marsh, which was two houses away from some cottages, had a detached house built which sold for £1005000. The site
could have accommodation two pairs of semi-detached cottages, which would have stood some chance of being affordable.

Low-paid workers, for example, those on the minimum wage, who cannot afford to buy so-called “affordable” homes or pay an “affordable” rent. There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low-paid workers such as those employed in the retail, warehousing and distribution sectors.

The number of homes planned in the urban area is too low. There is a glaring need for regeneration in Guildford and not retail or office space, but this is ignored in favour building homes on green-field sites instead. This will not address urban housing needs. It is also unsustainable, since building outside the town does disproportionately harm to road traffic, air quality and overstretched infrastructure. The plan envisages a large expansion of the traditional “bricks and mortar” retail sector, but this is a sector in rapid and continuous decline. All the stated policy aims for “inset” villages will be negated by the excessive weight of new housing development proposed which would radically change their character forever. Against this disruptive background, it is barely relevant to talk about preserving views!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPP16/15343  Respondent: 15571201 / Zoe Dudgeon  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

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Comment ID: PSLPP16/11463  Respondent: 15571425 / Monika Neczaj  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

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• Too much emphasis on traditional shops, when a lot of this sector is in terminal decline.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
POLICY D4 - Development in urban areas and inset villages - I OBJECT.

The plan envisages that 40% of homes built will be “affordable”, but this does not provide any accommodation for low-paid workers. The number of homes planned in the urban area is too low. There is a glaring need for regeneration in many urban areas, but this is ignored in favour building homes on green-field sites instead. All the stated policy aims for “inset” villages will be negated by the excessive weight of new housing development proposed which would radically change their character forever.

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Comment ID: PSLPP16/12258  Respondent: 15581665 / Laura Daboo  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4
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Comment ID: PSLPP16/12261  Respondent: 15581761 / Peter Lee  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4
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Comment ID: PSLPP16/12354  Respondent: 15582593 / Dermot McMullan  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

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Comment ID: PSLPP16/12420  Respondent: 15583169 / Poul Jensen  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

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Attached documents:

Comment ID: PSLPP16/12570  Respondent: 15584161 / Alexandra Elson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

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Comment ID: PSLPP16/12665  Respondent: 15584961 / Helen Meredith  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4
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Comment ID: PSLPP16/12773  Respondent: 15585601 / Sophie Corstin  Agent:
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?
POLICY D4 DEVELOPMENT IN URBAN AREAS

I object to policy D4 Development in urban areas and inset villages.

This policy that does not address the opportunity for building in the urban area.

The plan envisages that 40% of homes built will be 'affordable', but this does not provide any accommodation for low-paid workers, for example, those on the minimum wage, who cannot afford to buy so-called ‘affordable’ homes or pay an ‘affordable’ rent. There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low-paid workers such as those employed in the retail, warehousing and distribution sectors (all of which this plan aspires to expand).

The number of homes planned in the urban area is much too low. There is a glaring need for regeneration in many urban areas, particularly Guildford Town Centre but this is ignored in favour of building homes on green-field sites instead.

This will not address urban housing needs. It is also unsustainable, since building outside the town does disproportionate harm to road traffic, air quality and overstretched infrastructure.

The plan envisages a large expansion of the retail sector, but this is hard to justify because the sector is in rapid and continuous decline.

THE BROWNFIELD OPPORTUNITY

Yes, we need a new Local Plan for our borough in order to provide a development strategy within which we can accommodate our local housing, economic and environmental needs. But first we must make good use of our urban brownfield before we consider building in the Green Belt or countryside.

Paragraph 80 of the NPPF clearly states that Green Belt serves a key purpose, ‘to assist in urban regeneration, by encouraging the recycling of derelict land and other urban land’. In order to comply with central planning policy we need a brownfield strategy that states clearly. ‘We are committed to a brownfield first initiative whereby all applications on previously developed land are given fast track priority and every facility to promote development for residential purposes and employment purposes in order to satisfy the needs of local people. In parallel a low CIL incentive should be given for all residential development on brownfield land.

In response to the detailed objections received in the Regulation 18 process of the 2014 Local Plan and also in accordance with government policy a Guildford brownfield land register should be urgently compiled showing address, ownership, occupier, current use and detailed planning brief.

Perhaps someone could be appointed at GBC with a clear briefing to deliver brownfield targets of housing and employment space.

GBC needs to accelerate the residential redevelopment at Woodbridge Meadows, Walnut Tree Close and the Station within the next 5 years.

GBC needs to examine the residential development opportunity of the 25.7 acres of car parks in GBC ownership.
I do not consider that the target of 1,172 homes in the town centre takes account of the need and demand for housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town which will in itself help to sustain the retail core by increased economic impact.

The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015 which has recently been adopted by GBC. The reality is that the Town Centre has the capacity for significantly more homes. See details on GGG website - Guildford Greenbelt Group.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13259  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 D4

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13317  Respondent: 15589857 / Louise Herbert  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy D4: I object to the insetting of villages (meaning in fact, removal of villages from Green Belt protections) and the fact that they will suffer from higher density development with the resulting increase in traffic, and additional unacceptable pressure on infrastructure. I object in particular to the insetting of West Clandon, Send, West Horsley and East Horsley. This will have a detrimental impact on Green Belt openness and the views in and out of the AONB in direct contravention of Policy P1 and 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:** PSLPP16/14175  **Respondent:** 15601217 / Patrick Barrass  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

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:** PSLPP16/14174  **Respondent:** 15601249 / Ann Barrass  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

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: PSLPP16/14273  Respondent: 15601953 / Stephen Yandle  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

• No commitment to expand social housing or accommodation for people who can’t afford so-called affordable homes.
• Not enough new homes in urban areas, despite demand and need for urban regeneration and protection of Green Belt.
• Objectives for inset villages cancelled out by plans for excessive housing growth there.
• Too much emphasis on traditional shops, when a lot of this sector is in terminal decline.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14344  Respondent: 15602177 / Julia Hunt  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

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: PSLPP16/14685  Respondent: 15604449 / Annabel Curling  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

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Attached documents:

Comment ID: PSLPP16/14821  Respondent: 15607553 / Penelope Gillmore  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

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Comment ID: PSLPP16/14882  Respondent: 15608289 / Olivia Marshall  Agent:
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<th>Comment ID: PSLPP16/15193  Respondent: 15610785 / Liz Vinall  Agent:</th>
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<th>Comment ID: PSLPP16/15342  Respondent: 15612481 / Gillian Culmer  Agent:</th>
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<th>Comment ID: PSLPP16/15390</th>
<th>Respondent: 15614241 / Jane Smith</th>
<th>Agent:</th>
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Policy D4: I **object** to the insetting of villages (meaning in fact, removal of villages from Green Belt protections) and the fact that they will suffer from higher density development and the resulting increase in traffic, increased use of infrastructure which is already under pressure. I **object** in particular to the insetting of West Clandon, Send and the Horsleys. This will have a detrimental impact on Green Belt openness and the views in and out of the AONB in direct contravention of Policy P1 and P2.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<th>Comment ID: PSLPP16/15421</th>
<th>Respondent: 15614497 / Hannah Yandle</th>
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I **OBJECT TO POLICY D4 (DEVELOPMENT IN URBAN AREAS AND INSET VILLAGES)**

- No commitment to expand social housing or accommodation for people who can’t afford so-called affordable homes.
- Not enough new homes in urban areas, despite demand and need for urban regeneration and protection of Green Belt.
- Objectives for inset villages cancelled out by plans for excessive housing growth there.
- Too much emphasis on traditional shops, when a lot of this sector is in terminal decline.

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<th>Comment ID: PSLPP16/15491</th>
<th>Respondent: 15615745 / Nicholas Thompson</th>
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I **OBJECT to Policy D4 - Development in urban areas and inset villages**
The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionally.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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**Comment ID:** PSLPP16/15644  **Respondent:** 15618305 / Lawrence Claridge  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

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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:** PSLPP16/15643  **Respondent:** 15618337 / Matthew Pitt  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

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<th>Comment ID: PSLPP16/15679</th>
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I OBJECT. This is a piously aspirational policy that does not address any of the obvious practical issues already touched on above:

- The plan envisages that 40% of homes built will be “affordable”, but this does not provide any accommodation for low-paid workers, for example, those on the minimum wage, who cannot afford to buy so-called “affordable” homes or pay an “affordable” rent. There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low-paid workers such as those employed in the retail, warehousing and distribution sectors (all of which this plan aspires to expand).
- The number of homes planned in the urban area is too low. There is a glaring need for regeneration in many urban areas, but this is ignored in favour building homes on green-field sites instead. This will not address urban housing needs. It is also unsustainable, since building outside the town does disproportionate harm to road traffic, air quality and overstretched infrastructure.
- The plan envisages a large expansion of the traditional “bricks and mortar” retail sector, but this is a sector in rapid and continuous decline.
- All the stated policy aims for “inset” villages will be negated by the excessive weight of new housing development proposed which would radically change their character forever. Against this disruptive background, it is barely relevant to talk about preserving views!

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<th>Comment ID: PSLPP16/15712</th>
<th><strong>Respondent:</strong> 15619041 / Jack Cross</th>
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**Policy D4 - Development in Urban Areas and Inset Villages**

I do not object if policies H2 and H3 are implemented and all H2 developments are implemented without developers using clause 4.2.40 to escape their responsibilities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<tr>
<th>Comment ID: PSLPP16/15751</th>
<th><strong>Respondent:</strong> 15623745 / Stella May</th>
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Comment ID: PSLPP16/15830  Respondent: 15624577 / Alec Marshall  Agent:  
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I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16091  Respondent: 15631553 / Anthony Smith  Agent:  

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4
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<th>Comment ID:</th>
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<td>1. Policy D4: I <strong>object</strong> to the insetting of villages (meaning in fact, removal of villages from Green Belt protections) and the fact that they will suffer from higher density development and the resulting increase in traffic, increased use of infrastructure which is already under pressure. I <strong>object</strong> in particular to the insetting of West Clandon, Send and the Horsleys. This will have a detrimental impact on Green Belt openness and the views in and out of the AONB in direct contravention of Policy P1 and P2.</td>
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<td>I <strong>O B J E C T</strong> TO POLICY D4 (DEVELOPMENT IN URBAN AREAS AND INSET VILLAGES) • No commitment to expand social housing or accommodation for people who can’t afford so-called affordable homes. • Not enough new homes in urban areas, despite demand and need for urban regeneration and protection of Green Belt. • Objectives for inset villages cancelled out by plans for excessive housing growth there. • Too much emphasis on traditional shops, when a lot of this sector is in terminal decline.</td>
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<td>I <strong>o b j e c t</strong> to Policy D4 on Urban Development. The proposed supply for affordable housing is not meeting the demand where it is needed the most: in urban areas. Social housing is needed where there is a greater concentration of low paid workers such as those employed in the retail, warehousing and distribution sectors nearby. Instead the Draft Local Plan focuses on building homes on greenfield sites over regeneration of urban areas with 8,086 new houses planned for the Green Belt, but only 1,135 for Guildford urban area. This <strong>f a i l s</strong> to meet the <strong>h o u s i n g needs</strong> within the town and is <strong>u n s u s t a i n a b l e</strong> as it leads to increased road traffic into town centres.</td>
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POLICY D4 - Development in urban areas and inset villages

I object to this policy on the following grounds:

1. The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt, and the per person infrastructure investment can be reduced, e.g. fewer pavements, sewers, utility ducting per household than in the open countryside. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development. Living in a town with good access to public transport reduces the desire for personal transportation.

2. The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately and is not sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17144  Respondent: 15667489 / Tibbalds (Jon Herbert)  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy D4 of the Proposed Submission Local Plan sets out the approach to development in inset villages. The Inset villages were ‘washed over’ by Green belt allocations until recently and are still characterised as small settlements in rural areas. Send and Send Marsh / Burnt Common are already been subject to significant allocations that will fundamentally change the character of the settlements.

Para 4.3.12 of the Proposed Submission Local Plan notes that where villages are inset from the Green Belt, other development management policies should be used to restrict any inappropriate development. Policy D4 as phrased would allow proposals for development to come forward in addition to the site allocations identified in the Proposed Submission Local Plan.

Proposed changes to the Local Plan

The Parish Council request that Policy D4 is amended to defer to a neighbourhood plan where there is one in place, allowing this to establish sites for appropriate infill development in line with the general principles of strategic policy. Otherwise this policy could essentially override any sites identified by neighbourhood plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17347  Respondent: 15667489 / Tibbalds (Jon Herbert)  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Policy D4 of the Proposed Submission Local Plan sets out the approach to development in inset villages. The Inset villages were ‘washed over’ by Green belt allocations until recently and are still characterised as small settlements in rural areas. Send and Send Marsh / Burnt Common are already been subject to significant allocations that will fundamentally change the character of the settlements.

Para 4.3.12 of the Proposed Submission Local Plan notes that where villages are inset from the Green Belt, other development management policies should be used to restrict any inappropriate development. Policy D4 as phrased would allow proposals for development to come forward in addition to the site allocations identified in the Proposed Submission 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: PSLPP16/17383  Respondent: 15682305 / Monika Mundy  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy D4: I object to the insetting of villages (meaning in fact, removal of villages from Green Belt protections) and the fact that they will be suffer from higher density development and the resulting increase in traffic, use of infrastructure which is already under pressure. I object in particular to the insetting of West Clandon, Send and the Horsleys. This will have a detrimental impact on Green Belt openness and the views in and out of the AONB in direct contravention of Policy P1 and P2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17616  Respondent: 15688481 / Sally Lescher  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to policy D4 Development in urban areas and inset villages

This policy that does not address the opportunity for building in the urban area

The plan envisages that 40% of homes built will be “affordable”, but this does not provide any accommodation for low-paid workers, for example, those on the minimum wage, who cannot afford to buy so-called “affordable” homes or pay an “affordable” rent. There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low-paid workers such as those employed in the retail, warehousing and distribution sectors (all of which this plan aspires to expand).

The number of homes planned in the urban area is much too low. There is a glaring need for regeneration in many urban areas, particularly Guildford Town Centre but this is ignored in favour of building homes on green-field sites instead.

This will not address urban housing needs. It is also unsustainable, since building outside the town does disproportionate harm to road traffic, air quality and overstretched infrastructure.
The plan envisages a large expansion of the retail sector, but this is hard to justify because the sector is in rapid and continuous decline.

THE BROWNFIELD OPPORTUNITY

Yes, we need a new Local Plan for our borough in order to provide a development strategy within which we can accommodate our local housing, economic and environmental needs. But first we must make good use of our urban brownfield before we consider building in the Green Belt or countryside.

Paragraph 80 of the NPPF clearly states that Green Belt serves a key purpose, “to assist in urban regeneration, by encouraging the recycling of derelict land and other urban land”. In order to comply with central planning policy we need a brownfield strategy that states clearly. “We are committed to a brownfield first initiative whereby all applications on previously developed land are given fast track priority and every facility to promote development for residential purposes and employment purposes in order to satisfy the needs of local people. In parallel a low CIL incentive should be given for all residential development on brownfield land.

In response to the detailed objections received in the Regulation 18 process of the 2014 Local Plan and also in accordance with government policy a Guildford brownfield land register should be urgently compiled showing address, ownership, occupier, current use and detailed planning brief

Perhaps someone could be appointed at GBC with a clear briefing to deliver brownfield targets of housing and employment space

GBC needs to accelerate the residential redevelopment at Woodbridge Meadows, Walnut Tree Close and the Station within the next 5 years

GBC needs to examine the residential development opportunity of the 25.7 acres of car parks in GBC ownership

I do not consider that the target of 1,172 homes in the town centre takes account of the need and demand for housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town which will in itself help to sustain the retail core by increased economic impact.

The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015 which has recently been adopted by GBC. The reality is that the Town Centre has the capacity for significantly more homes. See details on GGG website - Guildford Greenbelt Group

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/17931 | Respondent: 15710369 / Steve Marshall | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |

Policy D4 anticipates that new possible development sites will be proposed in inset villages (which will include Normandy and Flexford if the Plan is adopted) in addition to current site locations. Whilst they state that they aim to protect the important character of these inset villages using other development management policies, it is inevitable that any such development, if granted, will further increase housing density, with greater impacts on wildlife (as above).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

POLICY D4: DEVELOPMENT IN URBAN AREAS AND INSET VILLAGES

Our Client is supportive of the proposed changes to the Urban Area and Settlement boundary shown around Ash; specifically the inclusion of Site A28. However, whilst the overall objectives of the policy guidance set out at Policy D4 are acknowledged and broadly supported by Our Client it is considered that the tone of the policy could serve to curtail rather than encourage the development of the specific site allocations identified in the Plan. Paragraph 4.5.46 suggests that the policy is targeted to windfall opportunities, however, the wording could still be applied to ‘all new development’ including site allocations. Our Client contend that this would undermine the delivery of Site Allocations and impact on the delivery of the Council’s housing target.

The expansion and development of edge of settlement sites will necessitate some changes in scale, massing and height. It will also be necessary to build at increased densities in order to ensure the most effective use of land. Whilst it will be important to ensure that new development successfully integrates within areas and does not impact on the amenities of neighbours the Borough requires a step change in the delivery of housing, particularly in urban areas. As such settlements and places will need to sensitively evolve.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
The principal of expanding and in-setting the village of Ripley from the Green Belt and the identification of Site Allocation A45 is supported.

However, whilst the overall objectives of the policy guidance set out at Policy D4 are acknowledged and broadly supported by Our Client it is considered that the tone of the policy could serve to curtail rather than encourage the development of the specific site allocations identified in the Plan. Paragraph 4.5.46 suggests that the policy is targeted to windfall opportunities, however, the wording could still be applied to ‘all new development’ including site allocations. Our Client contend that this would undermine the delivery of Site Allocations and impact on the delivery of the Council’s housing target.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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POLICY D4: CHARACTER AND DESIGN OF NEW DEVELOPMENT

1.86 Whilst the overall objectives of the updated policy guidance set out at Policy D4 are acknowledged and broadly supported by our client it is considered that the tone of the amended policy is now even more likely to serve to curtail rather than encourage the development of the specific site allocations identified in the Plan.

1.87 The Council do provide some much-needed clarity in broadening the policy to refer to all new development, however, our Client remain concerned that the policy has the potential to undermine the delivery of Site Allocations and impact on the delivery of the Council’s housing target.

1.88 The distilled reference to site density in this policy (moved from Policy H1- see earlier comments) when read in the context of the other policy restrictions will not serve to maximise the potential of the specifically identified site allocations. The policy should make a clear commitment to a density target which would be more clearly set out in Policy H1. It should also be made clear that the Site Allocations are expected to meet the projected density targets set out in the Pro-formas as a minimum.

1.89 The expansion and development of edge of settlement sites will necessitate some changes in scale, massing and height. It will also be necessary to build at increased densities in order to ensure the most effective use of land. Whilst it will be important to ensure that new development successfully integrates within areas and does not impact on the amenities of neighbours the Borough requires a step change in the delivery of housing, particularly in urban areas. As such settlements and places will need to sensitively evolve. Policy D4 in conjunction with Policy H1 needs to provide more of a driver for development.
UN SOUND: As currently drafted the policy will not be EFFECTIVE in securing the delivery of Site Allocations. It is suggested that the relevant aspects of the policy are re-worded as follows.

“High quality design is expected in the borough. All developments will:

d) Take appropriate account of the; existing grain street pattern, layout, scale, form, massing, height and materials of surrounding buildings and structures;

e) Deliver a minimum density of 30 dwellings per hectare on all allocated sites to ensure the most efficient use of the land. Unallocated sites should target a minimum density of 30 dwellings per hectare unless this would be of significant detriment to local character and context

l) Conserve, and where possible enhance designated heritage assets

m) Ensure that the amenities enjoyed by the occupants of buildings are protected.”

And the following additional text added for clarity:

“Development will be deemed acceptable in principle for all of the Site Allocations identified at pages 123-126. The approximate site densities should be achieved wherever possible subject to compliance with other plan policies.

The criteria set out for new development should also not serve as a brake on the delivery of Site Allocations.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15574  Respondent: 15977889 / Charles Kimpton  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

OBJECT. To the concept of insetting villages – see P3 above. 40% of new homes will be ‘affordable’ is not realistic as the plan proposes on green field sites and should be concentrated in urban areas local to places of work.

Insetting East and West Horsley flies in the face of reality. 385 homes is an increase of 35%, greater than anywhere else (16% Ash & Tongham and 11% in Guildford Town) and will face legal challenge.

The planned development will swamp the Horsleys with extra cars and people using the schools, shops, station, sports, medical centre, etc., they are dramatically unbalanced, unsustainable and the Plan does not address the provision, or even consider the need for expanding local services.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1082  Respondent: 17320801 / Terence O'Rourke Ltd for M&G Real Estate (Andrew Elliott)  Agent: Terence O'Rourke for M&G Real Estate (Andrew Elliott)

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
M&G welcomes this new design policy that will apply to all new development, notably the encouragement given to innovative architecture in the appropriate context, and use of appropriate density to make the most efficient use of land whilst responding to local character and context.

M&G requests that the wording of bullet D4(1n) on space standards be amended as follows, to repeat the approach used for D4(i). It is noted that the application of the standard should not compromise viability, and therefore there may be circumstances where full compliance is not possible and some flexibility in the application of the policy is necessary.

**POLICY D4: Character and design of new development**

(1) High quality design is expected in the borough. All developments will:

(n) be expected to have regard to and perform positively against the nationally described space standards as set out by the Department of Communities and Local Government (DCLG).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

POLICY D4: Character and design of new development

(1) High quality design is expected in the borough. All developments will:

…

(n) be expected to have regard to and perform positively against the nationally described space standards as set out by the Department of Communities and Local Government (DCLG).

**Attached documents:**

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<th>Comment ID: pslp171/1075</th>
<th>Respondent: 17328705 / Aviva Investors (Helen Rainsford)</th>
<th>Agent: Q+A Planning Ltd (Peter Keenan)</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy D4</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Q+A Planning Ltd act on behalf Aviva Investors in respect of White Lion Walk shopping centre in Guildford town centre.

Policy D4 has been significantly changed and concerns the character and design of new development. This includes a series of detailed design requirements and presumably is intended to replace, at least in part, the previous requirements concerning density in Policy H1. We have objected to Policy H1 to the removal of sensible support for high density residential developments in Guildford town centre. This sentiment has not been replaced in Policy D4.

The only response to density in the Plan concerns an open-ended requirement at criterion (d) of Policy D2 that seeks to ensure appropriate density to make the most efficient use of the land whilst responding to local character and context. Whilst as a concept, this is sensible, this gives little guidance on local circumstances or the general starting point on for density, particularly in the residential sector. Consistent with our comments on Policy H1, this is inconsistent with the requirements of local authorities in paragraph 47 of the NPPF to ‘set out their own approach to housing density to reflect local circumstances’.
It is requested that the overarching support for high density residential development in Guildford town centre ought to be re-introduced, since this properly responds to local circumstances and reflects the aim to deliver more housing in the town centre.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

See comments above

Attached documents:
POLICY D4: CHARACTER AND DESIGN OF NEW DEVELOPMENT

The aspiration for high quality design as set out in the criteria at Policy D4 is generally supported. In particular criteria m) which seeks to ensure appropriate density to make the most efficient use of the land whilst responding to local character and context. Criteria m) deals with the effect of development on the amenity enjoyed by the occupants of buildings. Whilst this general statement is supported, it is important that conclusions are not drawn disproportionately at the outline stage, rather that due consideration is made at the detailed planning stage. Therefore it is considered that an amendment to this criterion should be made to clarify the role of the detailed design stage.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Surrey Police welcome the inclusion of part c) which states that amongst other considerations that all developments will ‘create attractive, safe and accessible places that discourage crime and disorder through design’. This policy would currently be ineffective at reducing crime unless there was specific reference included to ‘Secured by Design’ standards. Inclusion of SBD in either Chapter 3 (Spatial Vision) or Policy D4 (Character and design of new development) would be essential to ensure there is sufficient policy justification to make new developments safe and minimise opportunities for crime and disorder. Secured by Design is actively promoted by our Crime Prevention Design Advisors who work with applicants to ensure opportunities for crime are minimised through good design.

Surrey Police recommend that Policy D4 should be amended to state that high quality design is expected in the borough. All developments will:

c) create attractive, safe and accessible places that discourage crime and disorder through design and the application of Secured by Design standards.

SBD has been adopted in a variety of schemes in the Borough of Guildford. A number of examples are listed below:

- 14/P/02259 | Erection of twelve residential dwellings with change of use from D1/D2 to C3 wing demolition existing social club. | Corporation Club,

- 06/P/02309 | Outline planning application is sought for a mixed use scheme adjacent to the railway line within an E-shaped courtyard development rising from three floors to five floor levels with basement parking, providing office units & residential on ground floor and first floors with residential above (in total 177 residential units) following demolition of two existing office units. | 1-2, Station View, Guildford, GU1

- 14/P/00474 | Redevelopment of existing garage site and replace with four x 1 bedroom apartments (amended plans received 08/05/14 showing two windows in the eastern elevation of the building) | Park Barn Drive Garages, Park Barn Drive Access To Garages, Guildford

- Mixed use development (Waitroise) including the erection of 45 flats and 3 town houses at the site formally known as the Bellerby Theatre, the Guildford Youth and Community Centre and the Live and Let Live PH.
Secured by Design is the UK Police flagship initiative, supporting the principles of ‘designing out crime’ by use of proven crime prevention measures and measurable and appropriate security standards. Creating a sense of place where residents and legitimate users are able to go about their daily routine without unduly fearing crime or insecurity is a key element of the Secured by Design initiative for New Homes. This is reflected by the National Planning Policy Framework 2012 (NPPF 2012) where its purpose is to provide ‘a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community’s needs and support its health, social and cultural well-being;’ (para. 7). Sustainable development seeks to ‘improve the conditions in which people live, work, travel and take leisure’ (para. 9). Core planning principles should ‘always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings’ (para. 17).

Crime should not be seen as a standalone issue, to be addressed separately from other design considerations. That is why guidance on crime has been embedded throughout the guidance on design rather than being set out in isolation.

Section 17 of the Crime and Disorder Act 1998 requires all local authorities to exercise their functions with due regard to their likely effect on crime and disorder, and to do all they reasonably can to prevent crime and disorder. The prevention of crime and the enhancement of community safety are matters that a local authority should consider when exercising its planning functions.

To ensure more developers are aware of SBD and that the principles of SBD are adopted in future development proposals, direct reference to ‘Secured by Design’ within development management policies is strongly recommended. Among the many benefits of SBD for future occupants, direct reference to SBD would ensure local plan compliance with the relevant paragraphs of the NPPF and NPPG guidance. We have suggested a recommended wording for an emerging development management policy to ensure reference to SBD is appropriately worded and to ensure that the Local Plan is compliant with the relevant policies of the NPPF concerning policing.

Unfortunately developers stating in their Design and Access Statement that they have ‘provided measures to achieve a development that responds to the key principals of Secured by Design’ does not ensure SBD will be adopted in the development.

Local Authorities must ensure that an application is made for a full Secured by Design (SbD) award and ensure that a planning condition be applied to require the development to SBD standards. Our Crime prevention design advisors will then work with applicants to ensure an assessment on all SBD matters is achieved and that the required standards are met to achieve a completion certificate.

**Access for emergency vehicles**

Surrey Police consider that reference to providing sufficient access for emergency service vehicles should be included within Policy D4 of the local plan. All developments will:

- **Ensure sufficient access is provided for emergency services – police, fire service and ambulance services.**

This is an important planning consideration for assessing new housing developments. Minimising obstructions to emergency vehicles is essential to help reduce response times and the ability of emergency services to access new homes and casualties in need.

With new developments including adopted and non-adopted roads, developers should ensure that there are no obstructions or reductions in road widths which would impact the ability of emergency service crews to service developments. Providing reference to access for emergency services to new development within local planning policy is considered necessary to raise awareness of this issue and ensure compliance with the relevant paragraphs of the NPPF.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
Comment ID: pslp171/1443  Respondent: 17976417 / Thakeham Homes (Sir or Madam)  Agent: Vail Williams LLP (J Lacey)

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

4.1 The aspiration for high quality design as set out in the criteria at Policy D4 is generally supported. In particular criteria, which seeks to ensure appropriate density to make the most efficient use of the land whilst responding to local character and context. Criteria m) deals with the effect of development on the amenity enjoyed by the occupants of buildings. Whilst this general statement is supported, it is important that conclusions are not drawn disproportionately at the outline stage, rather that due consideration is made at the detailed planning stage.

4.2 Therefore it is considered that an amendment to this criterion should be made to clarify the role of the detailed design stage.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1172  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 D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The changes to Policy D4 are deemed appropriate to reflect housing across the borough and not just the urban areas of Guildford, and Ash and Tongham, and inset villages.

Whilst the inclusion of the wording for high quality design expected in the borough is welcomed, the council should take a balanced view on the enforcement of each individual point, so that they are not to the detriment of the development coming forward. Each site should be considered on a site-by-site basis with various levels of weight attributed to each policy, to ensure the correct design of development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Total records: 372.